# Finance Wisdom LLC
# Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Finance Wisdom LLC. If you have any questions about the contents of this brochure, please contact us at (505) 217-9444 or by email at: Compliance@FinanceWisdom.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Finance Wisdom LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Finance Wisdom LLC's CRD number is: 325643.*

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*Registration as an investment advisor does not imply a certain level of skill or training.*

Version Date: 3/29/2026

# Item 2: Material Changes

We do not have any material changes to report since our last annual update to this firm brochure, which was on March 7, 2025.

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# Item 4: Advisory Business

## A. Description of the Advisory Firm

Finance Wisdom LLC (hereinafter "FWL" or "Firm") is a Limited Liability Company organized in the State of Delaware. The firm was formed in February 2023, and the principal owner and Chief Compliance Officer is Jeffrey Mermilliod.

## B. Types of Advisory Services

### *Portfolio Management Services- Bundled Fee Arrangement (WA & CA clients only)*

FWL provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, FWL generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, FWL's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to FWL). Clients cannot impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

### *Financial Planning*

Financial plans and financial planning may include but are not limited to the following:

- Investment Planning – involves working with clients to make sure their investments match their respective risk tolerance and goals.
- Insurance Planning – entails reviewing the life insurance and/or disability insurance needs of the client, together with any applicable dependents, spouse, or other relatives, and assessing appropriate coverage for these individuals.
- Tax Planning & Integration – tax concerns are addressed by working with the client to determine and compare effective tax rates for income, capital gains, and other earnings or investments, and/or attempting to allocate the client's resources accordingly. FWL can and will work closely with the client's tax advisor
- Financial & Retirement Planning – to address retirement planning, entails making sure clients are financially equipped for retirement in light of the client's anticipated income and expenses, investments, and other assets.
- Education Planning – entails helping clients save for higher education, whether for the client or his/her children or other dependents, in the ideal manner to suit the client's overall financial goals and means.
- Estate Planning – entails making decisions and preparing documents for distribution of assets post death.
- Debt/Credit Planning – consists of breaking down client budgets and aiding clients

in decision-making as to current debt, anticipated significant expenses and potential debt, and avoiding excessive debt.

FWL offers ongoing or one-time financial planning. FWL's ongoing financial planning service is recommended for client with low assets undermanagement based on the client situation and negotiation. This service consists of regular meetings and access to the advisor. Services are based on client need and may include financial planning, budget analysis, debt counseling, behavioral coaching, savings plans and/or portfolio analysis. Recommendations are discussed during the regular meetings then to clients in the form of after-action emails. These services will be completed within a year or other lesser term and that any further reviews may be performed in another contractual engagement with the client.

One-time plans are single engagement events and will include data collection, analysis, and written reports or recommendations based on the need of the client.

FWL will receive customary commissions from the sale of insurance products or receive fees or other compensation from the sale of securities, other products or investment services recommended in the financial plan. This presents a financial incentive to recommend these products. When recommending insurance or other products for which the supervised persons receive compensation, FWL will inform the client of any conflict of interest. Clients always have the right to decide whether to purchase FWL -recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with FWL.

## *Services Limited to Specific Types of Investments*

FWL generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, ETFs and bonds. Although FWL primarily recommends ETF & mutual funds FWL may use other securities as well to help diversify a portfolio when applicable.

## *Written Acknowledgement of Fiduciary Status*

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in

your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

As an investment adviser registered under the Securities Act of New Mexico and other applicable federal and state securities laws, the Adviser owes the client a fiduciary duty to put the Client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.

## C. Client Tailored Services and Client Imposed Restrictions

FWL will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and client specific requirements will be executed on an ongoing basis by FWL on behalf of the client. FWL may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent FWL from properly servicing the client account, or if the restrictions would require FWL to deviate from its standard suite of services, FWL reserves the right to end the relationship.

## D. Wrap Fee Programs

FWL acts as portfolio manager for and sponsor of a wrap fee program, which is an investment program where the client pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. However, this brochure describes FWL's non- wrap fee advisory services; clients utilizing FWL's wrap fee portfolio management should see FWL's separate Wrap Fee /Bundled Fee Program Brochure. FWL manages the investments in the wrap fee program but does not manage those wrap fee accounts any differently than it would manage non-wrap fee accounts. FWL receives the advisory fee set forth in FWL's separate Wrap Fee Program Brochure as a management fee under the wrap fee program.

For Washington clients, FWL offers a bundled fee arrangement rather than a wrap fee program.

## E. Assets Under Management

FWL has the following assets under management:

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated: |
|---|---|---|
| $38,652,823 | $19,707,141 | March 17, 2026 |

# Item 5: Fees & Compensation

## A. Fee Schedule

### *Portfolio Management Services- Bundled Fee Arrangement*

Fees for similar services may be obtained at other licensed investment advisory firms for lower cost.

| Total Assets | Maximum Annual Fee |
|---|---|
| All Assets | 2.00%** |

****Fees are negotiable**

Fee formula description: For purposes of calculating the client's portfolio management fees described above, an example is offered below for a sample $175,000 account:

- $175,000 X 2.00%= $3,500 annual fee
- $3,500/4= $875 quarterly fee

These fees are negotiable, and the final fee schedule will be memorialized in the client's advisory agreement.

Fees are paid quarterly in arrears. FWL uses the value of the account as of the last business day of the quarter for purposes of determining the market value of the assets upon which the advisory fee is based.

In computing the market value of any investment of the Account, the securities in the Account listed on a national securities exchange or otherwise subject to current last-sale reporting shall be valued at the amount reported on the statement that Client receives from the Custodian. Such securities which are not traded nor subject to last-sale reporting shall be valued at the latest available bid price reflected by quotations furnished to FWL by such sources as it may deem appropriate. Any other security shall be valued in such manner as shall be determined by FWL and Client, consistent with FWL's fiduciary duty, to reflect the security's fair market value. Client may dispute valuations with FWL if Client disagrees, at which point Client and FWL will discuss the valuation in order to promptly resolve the dispute.

Clients may terminate the agreement without penalty or fee within five business days of signing the agreement. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Advisory fees are in addition to the fees charged by third party money manager(s). Total fees charged by both parties will not exceed 2% of assets under management per year.

### *Financial Planning Fees*

## Ongoing or One-Time Fees

The negotiated ongoing rate for creating client financial plans is typically between $50 and $400 per month. The Firm can charge up to $400 per hour for more complex and comprehensive plans. Both the degree of work/service to the client and the AUM under management will be considered by FWL in determining exact fee amount and structure negotiated with the client and agreed to in writing. Please note AUM will be considered for reducing related financial planning fees. (The monthly rate calculation here assumes an hourly rate of $100).*

Clients interested in one-time Financial Planning that is not ongoing or is executed on an annual basis will negotiate on an individual basis with the Advisor and firm fees for such planning can range from $1,500 to $10,000 depending on complexity and work required. (The monthly rate calculation here assumes an hourly rate of $300.)

If no service is provided to the client or if the service that is provided does not meet the required hourly threshold based on the hourly financial planning service, the amount due will be reduced according to the service that was completed.

Clients may terminate the agreement without penalty or fee within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

*The hourly rate applies to clients in Washington only. In addition, for Washington clients, if no service is provided to the client or if the fixed fee charged to the client is higher than the fee calculated at the end of the billing cycle by multiplying the number of hours actually spent on the engagement and the hourly rate, then the fee difference must not be charged to the client.

## B. Payment of Fees

### *Payment of Portfolio Management Services- Bundled Fee*

Portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis.

For partial billing periods, fees will be prorated based upon the number of days the account was open during the billing period.

In all instances, FWL will provide the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. FWL will provide these to the client concurrent with the request for payment or payment of FWL's advisory fees. Clients are

urged to compare this information with the fees listed in the account statement.

### *Payment of Financial Planning Fees*

Financial planning fees are paid via ACH or credit card using a third party financial planning billing system.

Fixed financial planning fees are paid in arrears upon completion or can be paid monthly in arrears.

Upon completion, FWL will deliver the plan to the client.

## C. Client Responsibility For Third Party Fees

For non-wrap services, clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by FWL. Please see Item 12 of this brochure regarding broker-dealer/custodian.

For Washington clients, FWL will bundle third party fees (i.e., custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). FWL will charge clients one fee, and pay all transaction fees using the fee collected from the client. Washington clients in the bundle fee arrangement are not charged higher advisory fees based on trading activity, but clients should be aware that FWL has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs.

Certain other fees are not included in the bundle fee arrangement and are paid for separately by the client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, fees associated with "step out" transactions if the account uses different custodians or broker-dealers, 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.

## D. Prepayment of Fees

FWL collects its fees in arrears. It does not collect fees in advance.

## E. Outside Compensation For the Sale of Securities to Clients

Neither FWL nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Certain FWL supervised persons may also be licensed insurance agents. This presents a conflict of interest and gives the supervised person an incentive to recommend products

based on the compensation received rather than on the client's needs. When recommending insurance products for which the supervised persons receives compensation, FWL is documenting in this client disclosure that there is a conflict of interest. Clients always have the right to decide whether to purchase FWL -recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with FWL.

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

FWL does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client and so does not use side-by-side management.

# Item 7: Types of Clients

FWL generally provides advisory services to the following types of clients:

- Businesses
- Individuals
- Families

There is no account minimum for any of FWL's services.

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

## A. Methods of Analysis and Investment Strategies

### *Methods of Analysis*

FWL's methods of analysis include Modern Portfolio Theory. FWL has contracted with external third party institutional research and asset allocation modeling services to better service its clientele. FWL has contracted Wealthspire to provide proprietary portfolios to use for client investments. Wealthspire provides FWL with a large selection of portfolios with different risk profiles, investment objectives, and research documentation for our own due diligence requirements.

**Modern Portfolio Theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

## *Investment Strategies*

FWL primarily uses diversified portfolios utilizing low cost ETFs and Mutual Funds to represent/access different segments of the investing markets. Portfolios are designed with different risk profiles to allow different growth, income, and market risk tolerances, offering clients different options to meet their own goals and appetite for market risk. These portfolios are reviewed periodically by Firm Advisors and changes are made as appropriate based on market research/conditions and individual fund performance. At the individual client & account level an Advisor and Client may invest into specific equity or security positions to meet the individual goals of the Client or Household.

**Long term purchases** Long-term purchases are securities that are purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen changes in the company in which a Client is invested or in the overall market. Long-term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

# B. Material Risks Involved

## *Methods of Analysis*

**Modern Portfolio Theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

## *Investment Strategies*

**Long term purchases.** Due to its nature, the long-term strategy can expose Clients to various other types of risk that will typically surface at various intervals during the time the Client owns the investments. These risks include, but are not limited to, inflation (purchasing power) risk, interest rate risk, economic risk, and political/regulatory risk.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially "time the market" is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a

measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

# Item 9: Disciplinary Information

## A. Criminal or Civil Actions

There are no criminal or civil actions to report.

## B. Administrative Proceedings

There are no administrative proceedings to report.

## C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

# Item 10: Other Financial Industry Activities and Affiliations

## A. Registration as a Broker/Dealer or Broker/Dealer Representative

FWL is not registered as, nor has pending applications to become, a broker/dealer or a representative of a broker/dealer. One advisor is concurrently affiliated with another Broker Dealer but that business is separate of FWL activities.

## B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither FWL nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

## C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Jeffrey Mermilliod is the owner of an insurance agency that may offer insurance products to FWL clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending insurance products for which the supervised persons receives compensation. Finance Wisdom LLC is notifying clients and prospects through this disclosure of the conflict of interest. Clients always have the right to decide whether to purchase Finance Wisdom LLC - recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with Finance Wisdom LLC.

## D. Selection of Other Advisors or Managers and How This Advisor is Compensated for Those Selections

FWL does use third party advisors for certain clients. Third party managers have separate compensation agreements signed by the clients and account owners. FWL compensation will be paid out of the gross portfolio management fee received by the third party manager from the account or accounts being managed per a separate fee agreement between FWL and the client. Prior to selecting other third party advisors FWL will ensure the organization is properly licensed and reported.

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

## A. Code of Ethics

FWL has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. FWL's Code of Ethics is available free upon request to any client or prospective client.

## B. Recommendations Involving Material Financial Interests

FWL does not recommend that clients buy or sell any security in which a related person to FWL or FWL has a material financial interest.

## C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of FWL may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of FWL to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. FWL will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## D. Trading Securities At/Around Same Time as

From time to time, representatives of FWL may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of FWL to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, FWL will never engage in front-running or trading that operates to the client's disadvantage.

# Item 12: Brokerage Practices

## A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on FWL's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and FWL may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources and services provided by the brokers and custodian to aid in the research efforts of FWL.

FWL requires Axos Advisor Services.

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

While FWL has no formal soft dollars program in which soft dollars are used to pay for third party services, FWL may receive research, products, or other services from custodians, broker-dealers and institutional managers in connection with client securities transactions ("soft dollar benefits"). FWL may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and FWL does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. FWL benefits by not having to produce or pay for the research, products or services, and FWL will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that FWL's acceptance of soft dollar benefits may result in higher commissions charged to the client. Please note commissions for bundles fee services are not charged directly to the client.

### *2. Brokerage for Client Referrals*

FWL receives 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*

FWL does not trade client's accounts on accounts held outside of the firm's chosen custodian. Not all advisers require their clients to direct brokerage.

### B. Aggregating (Block) Trading for Multiple Client Accounts

FWL does block trade client's accounts at its discretion when the assigned account investment plan is one of the firm's standardized portfolios. If FWL buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, FWL would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. FWL would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with FWL's duty to seek best execution.

## Item 13: Review of Accounts

### A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

The Advisor reviews and evaluates client accounts with the client for compliance with client's investment objectives, policies, and restrictions. Client meetings will be offered at minimum, on an annual basis. The Advisor will ensure that the investment portfolio and risk profile are in alignment with the client's appetite for risk and long-term objectives. Furthermore, the Advisor will ensure that the client has adequate cash to meet their withdrawal needs and when the client is investing, ensure that the funds are allocated appropriately into the planned portfolio.

### B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Accounts will be reviewed additionally when cash balance is out of standards, deviation of performance, and when client meetings are scheduled.

### C. Content and Frequency of Regular Reports Provided to Clients

Each client has electronic access to performance, holdings, & balances through the Custodian client portal.

# Item 14: Client Referrals & Other Compensation

## A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

FWL does not receive any economic benefit, directly or indirectly from any third party for advice rendered to FWL's clients.

## B. Compensation to Non – Advisory Personnel for Client Referrals

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

# Item 15: Custody

FWL does not take actual custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements.

For Washington & California clients who are provided portfolio management services through a bundled fee, when advisory fees are deducted directly from client accounts at client's custodian, FWL will be deemed to have limited custody of client's assets. Because client fees will be withdrawn directly from client accounts, in states that require it, FWL will:

(A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.

(B) Send the qualified custodian written notice of the amount of the fee to be deducted from the client's account and verify that the qualified custodian sends statements to the client.

(C) Send the client a written invoice itemizing the fee upon or prior to fee deduction, including the formula used to calculate the fee, the time period covered by the fee, the amount of assets under management on which the fee was based, the fee calculation, and the name of the custodian.

Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients are urged to compare the account statements they received from custodian with those they received from FWL.

# Item 16: Investment Discretion

For wrap services, FWL does have discretion over client accounts. FWL also has discretion over Washington & California client accounts that received portfolio management services as part of a

bundled fee. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, FWL generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share.

# Item 17: Voting Client Securities (Proxy Voting)

FWL will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

# Item 18: Financial Information

## A. Balance Sheet

FWL neither requires nor solicits prepayment of more than $500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

## B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither FWL nor its management has any financial condition that is likely to reasonably impair FWL's ability to meet contractual commitments to clients.

## C. Bankruptcy Petitions in Previous Ten Years

FWL has not been the subject of a bankruptcy petition in the last ten years.

# Item 19: Requirements For State Registered Advisors

## A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

FWL currently has only one management person: Jeffrey Mermilliod. Education and business background can be found on the individual's Form ADV Part 2B brochure

supplement. Form ADV Part 2B will be delivered in conjunction with Form ADV Part 2A.

## B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

## C. Calculation of Performance-Based Fees and Degree of Risk to Clients

FWL does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

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## D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

## E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither FWL, nor its management persons, has any relationship or arrangement with issuers of securities.

FWL and associated IAR's have reasonably disclosed all material conflicts of interest.

***This brochure supplement provides information about Jeffrey Mermilliod that supplements the Finance Wisdom LLC brochure. You should have received a copy of that brochure. Please contact Jeffrey Mermilliod if you did not receive Finance Wisdom LLC's brochure or if you have any questions about the contents of this supplement.***

***Additional information about Jeffrey Mermilliod is also available on the SEC's website at www.adviserinfo.sec.gov.***

# Finance Wisdom LLC

## Form ADV Part 2B – Individual Disclosure Brochure

*for*

## Jeffrey Mermilliod

Personal CRD Number: 6696531

Investment Adviser Representative

Finance Wisdom LLC
2 Abajo Ct
Edgewood, NM 87015
(505) 217-9444
Jeffrey@FinanceWisdom.com

UPDATED: 03/27/2026

# Item 2: Educational Background and Business Experience

**Name:** Jeffrey Mermilliod **Born:** 1973

## Educational Background and Professional Designations:

## Education:

MBA, Finance Business Management, Portland State University - 2010
BS, Clinical Management & Leadership Healthcare management, George Washington University - 2005

## Business Background:

| | |
|---|---|
| 03/2023 - Present | Owner and Chief Compliance Officer<br>Finance Wisdom LLC |
| 08/2010 – 08/2023 | Medical Service Corps Officer<br>US Air Force Reserve |
| 02/2020 – 03/2023 | Financial Advisor<br>2020 Capital Management/Prime Capital Investment Advisors, LLC |
| 02/2020 – 12/2021 | Registered Representative<br>Ameritas Investment Company, LLC |
| 01/2017 - 02/2020 | Financial Advisor<br>Finity Group/Cambridge Investment Research |
| 08/2016 – 12/2016 | Associated Person<br>Waddell & Reed, Inc. |

# Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Jeffrey Mermilliod is a licensed insurance agent. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending insurance products for which the supervised persons receives compensation, Finance Wisdom LLC will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase Finance Wisdom LLC -recommended products and, if purchasing, have the right to purchase those products through other agents that are not affiliated with Finance Wisdom LLC.

Jeffrey Mermilliod is a business consultant. This is a non-investment related business activity is separate from his work with Finance Wisdom LLC.

## Item 5: Additional Compensation

Jeffrey Mermilliod does not receive any economic benefit from any person, company, or organization, other than Finance Wisdom LLC in exchange for providing clients advisory services through Finance Wisdom LLC.

## Item 6: Supervision

As the Chief Compliance Officer of Finance Wisdom LLC, Jeffrey Mermilliod supervises all activities of the firm. Jeffrey Mermilliod's contact information is on the cover page of this disclosure document. Jeffrey Mermilliod adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

## Item 7: Requirements For State Registered Advisers

*This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

A. Jeffrey Mermilliod has NOT been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:

   a) an investment or an investment-related business or activity;

   b) fraud, false statement(s), or omissions;

   c) theft, embezzlement, or other wrongful taking of property;

   d) bribery, forgery, counterfeiting, or extortion; or

   e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    a) an investment or an investment-related business or activity;
    b) fraud, false statement(s), or omissions;
    c) theft, embezzlement, or other wrongful taking of property;
    d) bribery, forgery, counterfeiting, or extortion; or
    e) dishonest, unfair, or unethical practices.

B. Jeffrey Mermilliod has NOT been the subject of a bankruptcy.