



Meritum Wealth Management LLC Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Meritum Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (937) 829-2213 or by email at: vasili@meritumwealth.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 Meritum Wealth Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Meritum Wealth Management LLC's CRD number is: 321634.

3180 Golden Hollow Avenue
Cincinnati, Ohio 45226
Office: (513) 201-8665
Direct: (937) 829-2213
Vasili@Meritumwealth.com
www.meritumwealth.com

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

Version Date: 03/25/2025

Item 2: Material Changes

We review and update our Form ADV Part 2A Brochure at least annually to make sure that it remains current. The purpose of this page is to inform you of any material changes since the previous annual updating amendment to this brochure. Since our last annual updated Form ADV Part 2A Brochure, we have made the following material changes:

- We have updated the cover page of our Form ADV Part 2A to add our website address and business phone number.
- We have updated the current Assets Under Management under Item 4 (E) to reflect our new current Assets Under Management, which are: *Discretionary*: \$11,261,075 and *Non-Discretionary*: \$498,811
- We have changed the name of Item 17 from "Voting Client Securities (Proxy Voting)" to "Voting Client Securities".
- We have fixed a spelling error in Item 4 (B) from "client&39;s" to "client's"
- We have amended the verbiage of Item 4 (B) from "...fiduciary duties owed to its accounts.." to "...fiduciary duties owed to its clients.."
- We have amended the verbiage of Item 4 (C) to remove the word "not" to clarify that clients "may" impose restrictions in investing in certain securities or types of securities in accordance with their values and beliefs.
- We have updated Item 5 (A) to provide an example of monthly fee calculations.
- We have amended Item 5 (A) for Pension Consulting Services Fees to correctly reflect the fee of 0.25% - 0.50% to match our Pension Consulting Agreement Exhibit I.
- We have amended Item 5 (A) to remove portfolio management services, acting as a third-party money manager, for other third-party firms, including Registered Investment Advisor (RIA) Firms, Hedge Funds, or Proprietary Trading Firms.
- We have amended the verbiage in Item 5 (B) to match our Financial Planning Agreement Exhibit I to reflect "If this Agreement is terminated prior to completion of the financial planning services, then Client will be responsible for paying the prorated fee for work completed but unpaid (if any) at the time termination becomes effective".
- We have amended the verbiage in Item 8 to include product descriptions and risk associated with leveraged ETFs.
- We have amended the verbiage in Item 10 (C) to remove the word "Possible"
- We have amended the verbiage in Item 10 (C) to update and disclose the material relationship between Vasilios Zois and The Zois Group LLC.
- We have amended the verbiage in Item 11 (C) to remove the word "May".
- We have amended the verbiage in Item 11 (D) to remove the word "May".
- We have corrected the verbiage in Item 13 (A) to state that Vasilios Zois is Managing Partner and Chief Compliance Officer
- We have amended Item 5 to remove services acting as a third-party money manager for other investment advisory firms.

Full Brochure Available

In addition to the items noted above, please carefully review the entire brochure. If you have questions, or if you would like to receive a complete copy of our most current Form ADV Part 2A Brochure at any time, free of charge, please contact Vasilios Zois, Chief Compliance Officer, at (937) 829-2213 or vasili@meritumwealth.com.

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes	ii
Item 3: Table of Contents	iii
Item 4: Advisory Business	2
Item 5: Fees and Compensation	3
Item 6: Performance-Based Fees and Side-By-Side Management	5
Item 7: Types of Clients	5
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss	5
Item 9: Disciplinary Information	7
Item 10: Other Financial Industry Activities and Affiliations	7
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	8
Item 12: Brokerage Practices	9
Item 13: Review of Accounts	9
Item 14: Client Referrals and Other Compensation	10
Item 15: Custody	10
Item 16: Investment Discretion	10
Item 17: Voting Client Securities (Proxy Voting)	11
Item 18: Financial Information	11
Item 19: Requirements For State Registered Advisers	11

Item 4: Advisory Business

A. Description of Advisory Business

Meritum Wealth Management LLC (hereinafter “MWML”) is a Limited Liability Company organized in the state of Ohio. The firm was formed in March 2022, and the principal owners are Jason Lipps and Vasilios Nicholas Zois. Meritum Wealth Management LLC also does business as Meritum Advisors.

B. Types of Advisory Services

Portfolio Management Services

MWML offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. MWML creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

MWML evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. MWML provides discretionary and non-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, MWML 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, MWML'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 MWML). Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. MWML seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its clients and without consideration of MWML's economic, investment or other financial interests. To meet its fiduciary obligations, MWML attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, MWML's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is MWML's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Pension Consulting Services

MWML offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- Identifying investment objectives and restrictions
- providing guidance on various asset classes and investment options
- Recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators, and broker-dealers
- creating a written pension consultation plan

These services are based on goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Financial Planning

Financial plans and financial planning may include but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

MWML generally limits its investment advice to mutual funds, fixed income securities, equities, ETFs (including ETFs in the gold, precious metal sectors, and leveraged ETFs), treasury inflation protected/inflation linked bonds and non-U.S. securities. MWML may use other securities as well to help diversify a portfolio when applicable.

Written Acknowledgment 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 interests, 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.

C. Client Tailored Services and Client Imposed Restrictions

MWML will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by MWML on behalf of the client. MWML 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.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. MWML does not participate in wrap fee programs.

E. Assets Under Management

MWML has the following assets under management:

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated
\$11,261,075	\$498,811	March 25 th , 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees (For Individual, Trust, Business, or Organization Client Accounts)

Total Assets Under Management	Annual Fee
\$0 - \$1,000,000	0.95%
\$1,000,001 - \$2,000,000	0.80%
\$2,000,001 +	0.65%

MWML uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of MWML's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 3 days' written notice.

The following is an example of how Asset Under Management fees are calculated:

Client A has an account with \$500,000 of investable assets, which falls under our 0.95% of annual Asset Under Management Fee. This fee would be calculated as $\$500,000 \times 0.95\% = \$4,750$ annually. MWML's fees are deducted monthly in arrears based on the account value at the end of each month, so for further clarification, the fee would be calculated and billed as: $(\$500,000 \times 0.95\%) / 12$, or $\$500,000 \times 0.079\%$ ($0.95\% / 12$), = \$395 for a specific month in which the account value was \$500,000 at the end of the month.

Pension Consulting Services Fees

Asset-Based Fees for Pension Consulting

Total Assets Under Management	Annual Fee
All Assets	0.25-0.50%

MWML uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of MWML's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 3 days' written notice.

Investment Research and Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans for individual clients is between \$100 and \$1,500. This fee will be determined and agreed upon between MWML and the client(s) using our Financial Planning Agreement contract. The fee will ultimately be determined by the complexity of the engagement, time involved developing the plan, services/products/strategies/etc that will be need to be rendered or performed, etc.

Hourly Fees

The range of hourly fees for Investment Research and/or Financial Planning is \$250 - \$350 per hour, with the maximum for individual client services is \$350 per hour. This fee will be determined and agreed upon between MWML and the client(s) using our Financial Planning Agreement contract. The fee will ultimately be determined by the complexity of the engagement, time involved developing the plan, services/products/strategies/etc that will be need to be rendered or performed, etc.

The minimum negotiated hourly fee for institutional client (Registered Investment Advisor firms, Hedge Funds, and Proprietary Trading Firms) services is \$500.

The fees charged to institutional clients may vary based on the overall scope of research, planning, and advice is being rendered for each individual institutional client.

Clients may terminate the agreement without penalty, for full refund of MWML's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees (For All Portfolio Management Fees)

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis or may be invoiced and billed directly to the client on a monthly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

Payment of Pension Consulting Services Fees

Pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis or may be invoiced and billed directly to the client on a monthly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

Payment of Financial Planning Fees

Financial planning fees are paid via check and wire. Fixed and Hourly financial planning fees are paid in arrears upon completion. If the Financial Planning Agreement (Fixed or Hourly) is terminated prior to completion of the financial planning services, then Client will be responsible for paying the prorated fee for work completed but unpaid (if any) at the time termination becomes effective.

C. Client Responsibility For Third Party Fees

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 MWML. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

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

E. Outside Compensation For The Sale of Securities to Clients

Neither MWML 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. If any commissionable products, such as annuities or life insurance-based products, are sold or recommended, any and all commissions must be disclosed and documented to the client and for company records.

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

MWML 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.

Item 7: Types of Clients

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

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans
- Charitable Organizations
- Registered Investment Advisor (RIA) Firms, Hedge Funds, and/or Proprietary Trading Firms

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

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

MWML's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Charting analysis involves the use of patterns in performance charts. MWML uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

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.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

MWML uses long term trading, short term trading and options trading (including covered options, uncovered options, or spreading strategies).

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

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

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.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

MWMLs' use of options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various 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, market risk, and political/regulatory risk.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. 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.

C. Risks of Specific Securities Utilized

MWMLs' use of options trading generally holds greater risk of capital loss. 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 counter parties. 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. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

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. 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. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. 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. MWML may utilize leveraged ETFs in specific scenarios as deemed fit for a client's individual needs. Leveraged ETFs are financial instruments designed to amplify the daily returns of an underlying index, asset, or benchmark. These funds typically use financial derivatives and debt to achieve their investment objectives, often seeking to provide multiple (e.g. 2x or 3x) of the daily performance of the tracked asset(s). Some leveraged ETFs are also inverse, aiming to deliver the opposite of the benchmark's performance. Risks associated with leveraged ETFs include increased volatility and risk of loss, liquidity and market risks, higher costs and expenses, counterparty and derivative risks, and suitability considerations.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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 for MWML nor any of its registered representatives.

B. Administrative Proceedings

There are no administrative proceedings to report for MWML nor any of its registered representatives.

C. Self-Regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report for MWML nor any of its registered representatives.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representatives

Neither MWML nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither MWML 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 Conflicts of Interests

Vasilios Nicholas Zois is a licensed insurance agent & owner of The Zois Group LLC, an independent insurance agency, not affiliated with Meritum Wealth Management LLC. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of MWML are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. MWML addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. MWML periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. MWML will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service).

No client is ever under any obligation to purchase any insurance product. Insurance products recommended by MWML's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

Vasilios Nicholaos Zois is also the owner of Meritum Tax Advisors LLC, a tax preparation and tax planning company. In this separate capacity, Mr. Zois typically recommends Meritum Tax Advisors LLC to advisory clients in need of tax services. Tax services provided by Meritum Tax Advisors LLC are separate and distinct from MWML's advisory services and are provided for separate and typical compensation. MWML has the discretion to waive the fee for tax services depending upon the size of the client's portfolio management account. The receipt of additional compensation represents a conflict of interest because it creates an incentive to recommend services based on the compensation received. This conflict is mitigated by disclosures, procedures, and MWML's fiduciary obligation to place the best interest of the client first. No client of MWML is obligated to use Meritum Tax Advisors LLC for any tax services. Clients have the option to purchase these services through another tax manager of their choosing.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

MWML does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

MWML 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, Record keeping, Annual Review, and Sanctions. MWML's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of MWML may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of MWML 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 create a conflict of interest. MWML 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 the Same Time as Clients' Securities

From time to time, representatives of MWML may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of MWML 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 create a conflict of interest; however, MWML will never engage in trading that operates to the client's disadvantage if representatives of MWML buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on MWML's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and MWML may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in MWML's research efforts. MWML will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

MWML will require clients to use Interactive Brokers LLC or Altruist LLC.

1. Research and Other Soft-Dollar Benefits

While MWML has no formal soft dollars program in which soft dollars are used to pay for third party services, MWML may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). MWML 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 MWML does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. MWML benefits by not having to produce or pay for the research, products or services, and MWML will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that MWML's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

MWML 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

MWML will require that clients use a specific broker-dealer to execute transactions. There is no conflict of interest, as the broker-dealer is not an affiliate or related person of MWML. By directing brokerage, MWML may be unable to achieve most favorable execution of client transactions which could cost clients money in trade execution. Not all advisers require or allow

B. Aggregating (Block) Trading for Multiple Client Accounts

If MWML buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, MWML 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. MWML would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution.

Item 13: Review of Accounts

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

All client accounts for MWML's advisory services provided on an ongoing basis are reviewed at least annually by Vasilios Zois, Managing Partner and Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at MWML are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Vasilios Zois, Managing Partner and Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee..

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

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, MWML's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of MWML's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

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

Other than soft dollar benefits as described in Item 12 above, MWML does not receive any economic benefit, directly or indirectly from any third party for advice rendered to MWML clients..

B. Compensation to Non-Advisory Personnel for Client Referrals

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

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, MWML will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive quarterly account statements from the custodian and, in jurisdictions that require it, monthly billing invoices from MWML. Clients are urged to compare the account statements they received from custodian with any statements they received from MWML.

Item 16: Investment Discretion

MWML provides discretionary and non-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, MWML 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, MWML'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 MWML).

Item 17: Voting Client Securities

MWML 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

MWML 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 MWML nor its management has any financial condition that is likely to reasonably impair MWML's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements For State Registered Advisers

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

The education and business backgrounds of MWML's current management persons, Jason Robert Lipps and Vasilios Nicholas Zois, can be found on the Form ADV Part 2B brochure supplements for those individuals.

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 Degrees of Risk to Clients

MWML 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.

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 for MWML nor any of its registered representatives.

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

See Item 10.C and 11.B.