

# Millennial Money Management LLC

Firm Brochure – Form ADV Part 2A

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This brochure provides information about the qualifications and business practices of Millennial Money Management LLC. If you have any questions about the contents of this brochure, please contact us at (814) 853-3379 or by email at: [matt@milmoneymanagement.com](mailto:matt@milmoneymanagement.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 Millennial Money Management LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Millennial Money Management, LLC's CRD number is: 287837.

Millennial Money Management LLC is a registered investment adviser. Registration with the United States Securities Exchange Commission or any state authority does not imply a certain level of skill or training.

Version Date: 03/21/2023

## Item 2: Material Changes

*Form ADV Part 2A requires all registered investment advisors to amend their brochure when information becomes materially inaccurate. If there are any material changes to this disclosure brochure, Millennial Money Management LLC must notify you and provide a description of the changes.*

The last annual update of this Brochure was filed on 03/21/2022. Since this filing, no material changes have been made.

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete 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 Millennial Money Management LLC.

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## Item 4: Advisory Business

### **A: Description of Advisory Firm**

Millennial Money Management LLC is a newly formed investment advisor registered and established under the laws of the State of Pennsylvania in the year 2017. Millennial Money Management LLC's sole owner and employee is Matthew Robert Stearns of Saegertown, Pennsylvania.

### **B: Types of Advisory Services**

Millennial Money Management LLC (hereinafter "MMM") offers the following services:

- Asset Management
- Investment Consultation
- Financial Planning (including Retirement Planning)
- Budget Analysis
- Student Loan Consultation

#### **Asset Management:**

Every investor with MMM is entitled to real-time access to their funds and a fully integrated online experience. For each client, MMM will create an investment policy statement that outlines their financial situation, needs, goals, and strategy moving forward. This statement typically includes the following, but is not limited to: risk tolerance level, time horizon outlook, income and tax level, special requirements, and goals. MMM then uses that plan to construct a portfolio that is congruent with a client's needs. MMM actively manages model portfolios and funds and allocates them in a weighted manner to match an investor's particular situation. MMM uses several strategies and methods of analysis that are outlined later in the Form ADV.

#### **Investment Consultation:**

This service provides investment consultation to clients that do not use MMM as their money manager. This consultation is typically provided to clients with employee sponsored 401(k) accounts, and other self-directed investment vehicles. MMM will consider a client's current investment portfolio and critique it using the same methods of analysis that it uses for its management clients, these include: tactical allocation, diversification, time horizon consideration, and risk exposure. Upon consideration MMM will issue formal judgement on a client's portfolio and offer corrective action if necessary.

MMM generally limits its investment advice and management to equities, bonds, fixed income assets, debt securities, ETFs, mutual funds, and derivatives.

#### **Financial Planning (including retirement planning):**

This service takes a comprehensive look at a client's current financial situation and tailors a plan to fit their specific needs. Upon review, MMM examines clients' current income and tax levels, investment planning, financial time horizon, debt/credit standing, and retirement outlook. After examination, MMM takes into consideration a client's particular concerns and goals and then

constructs a synopsis of their current situation, their future outlook, areas of concern, and corrective action as deemed fit by the adviser. All of this is laid out in a formal customized plan that a client can use to reevaluate and improve their financial situation in an ongoing manner.

**Financial Consultation (Hourly):**

This service is aimed at addressing a client’s specific and immediate needs without the necessity for a comprehensive financial plan. This service considers a client’s current financial situation and offers advice pertinent to the specific requests of the clients. This service is separate and distinct from investment management consultation.

Clients may terminate their contracts without penalty for any reason within the first five (5) business days after signing and receive a 100% refund of any prepaid fees.

**C. Tailored Services and Client Imposed Restrictions**

MMM is committed to providing customized one-on-one service to every client based on their individual needs, no matter the size of their account. All services are offered to all clients, and some services may be offered complimentary depending on whether the client is an investing client or requires special consideration.

Clients may impose restrictions on investing in certain securities or types of securities.

**D. Wrap Fee Programs**

A wrap fee program is a program where all fees associated with the management of an account are lumped together into a single fee regardless of activity and managerial level. MMM does not participate in any wrap fee programs.

**E: Assets under Management**

Total Assets under Management as of December 31, 2022: \$20,360,920

Discretionary AUM: \$13,219,331

Non-Discretionary AUM: \$7,141,589

## Item 5: Fees and Compensation

### A. Fee Schedule

#### Asset Management Fees:

<i>Total Assets Under Management</i>	<i>Annual Fee</i>
First \$50,000	1.50%
Next \$50,000.01-\$499,999.99	1.25%
Next \$500,000.00-\$999,999.99	1.0%
Over \$1,000,000+	0.75%

The management fee is calculated and collected quarterly in advance. The initial quarter's management fee is calculated and collected when assets are deposited into the Account and it is prorated for the number of days remaining in the quarter. Thereafter, the management fee calculation is based upon the Account's custodian reported value as of last business day of the previous quarter. Cash balances and investments in money market funds, demand deposit accounts, and certificates of deposit held in the Account are included in the fee calculations.

The management fee is tiered. A tiered fee means the applicable rate will be applied to the custodian-reported value in each applicable range of Account value. For example, an Account with a quarter end value of \$200,000 will be charged at a rate of 1.50% for the first \$50,000 and 1.25% for the remaining \$150,000. With a balance of \$200,000 at time of the quarterly calculation, Client is charged  $((\$50,000 * 1.5\%) / 4) + ((\$150,000 * 1.25\%) / 4) = \$187.50 + \$468.75 = \$656.25$ .

All management fees are negotiable depending on the needs of the Client. The Adviser's management fee is also separate and distinct from other fees or expenses that may include brokerage charges, transaction fees, and other related costs and expenses. Additionally, clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by mutual fund managers, 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 funds and exchange traded funds also charge internal management fees, as disclosed in a fund's prospectus, which are separate and distinct from the Adviser's fee. Client acknowledges, as applicable, that these internal charges are an inherent expense of Client's account in addition to the fees and charges contemplated in this Agreement.

#### Investment Consultation Fee:

Services offered are detailed in *Item 4, Part A* of this form. The fee for investment consultation is \$150 per consultation. The fees may be negotiated depending on client needs and complexity. The client specific fee will be laid out in the relationship agreement. Investment consultation fees are to be billed upon execution of the consultation at the agreed upon amount. MMM reserves the right to waive the fee or request full or partial payment prior to delivery of service.

**Financial Planning Fee:**

Services offered are detailed in *Item 4, Part A* of this form. The engagement fee for planning services starts at \$600 per plan. The ongoing retainer fee for follow-up meetings and plan access is \$200/month. These fees may be negotiated depending on client needs and complexity. The client specific fee will be laid out in the relationship agreement. MMM requests engagement fee to be paid upon execution of agreement. Retainer fees are paid monthly thereafter, billed no sooner than 30 days after execution of agreement. There is no minimum contract period. MMM reserves the right to waive the fee, require full or partial payment prior to completion, or accept payment upon delivery of the service.

**Financial Consultation Fee:**

Services offered are detailed in *Item 4, Part A* of this form. The fee for financial consultation is based on a \$150 per hour rate. Total hours billable are based on time of engagement with advisor and duration of work done by advisor. That includes meeting time, correspondence via phone or email, and duration of work to complete client requested tasks. Hours are tracked and reported to client and client is billed upon completion of all work. This hourly rate may be negotiated depending on client need and complexity. MMM reserves the right to waive the fee or request full or partial payment prior delivery of the service.

**B. Payment of Fees****Payment of Investment Management Fees:**

All investment management fees are calculated by the method described in *Item 4: Part A* of this form. Fees will be withdrawn directly from client accounts on a quarterly basis in advance with prior written client approval in the relationship agreement. MMM's will send the clients and the clients' custodian an invoice specifying the fee, the formula used to calculate the fee, the assets under management the fee is based on, and the time period covered by the fee. Client may terminate this authorization at any time by giving MMM or clients' custodian notice.

**Payment of Financial Planning Fees:**

Financial planning engagement fees are to be billed upon execution of agreement with a due date no later than 5 days following invoice date. Monthly retainer fees are to be billed no sooner than 30 days following the execution of the agreement.

**Payment of Consultation Fees (including Investment Consultation and Financial Planning Consultation):**

All consultation fees are to be billed upon completion of service with a due date no later than 5 days following completion of service.

**C. Third Party Fees**

Investing clients of MMM may incur third party fees that accrue as a result of normal business activity. These fees are separate and distinct from the fees charged by MMM. The fees may include any transactional fees that occur as a result of trading, including but not limited to;

brokerage fees, custodial fees, ticket charges, mutual fund fees, etc. As a fiduciary, MMM will always act in a way that minimizes these fees as much as possible within reason. MMM has also carefully selected their broker and custodian with consideration to the third party fees they impose on clients. Please refer to *Item 12* of this form for more information regarding MMM's broker/custodian.

#### **D. Prepaid Fees**

For investing services, MMM deducts fees from a client's account at the beginning of each client's fiscal quarter, beginning at time of account funding. MMM does not collect fees in advance for investment services, besides in the aforementioned manner. If a client wishes to withdraw their funds from management, their most recent quarterly fee will be pro-rated and the balance refunded, calculated according to the day that written notice of termination was obtained.

#### **E. Outside Compensation for Sale of Securities**

MMM has no affiliation or loyalty to any outside investment firm or their products, and receives no compensation in any form thereupon.

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

MMM does not charge or collect any performance-based fees based on capital gains or appreciation on a client's account.

## Item 7: Types of Clients

MMM generally provides investment advice to the following clients:

- Individuals
- High net worth individuals
- Small businesses
- Pension and Profit-Sharing Plans
- Non-Profit Organizations

MMM does not have require a minimum account size.



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

### A. Methods of Analysis and Investment Strategies

The following analyses and strategies represent the main techniques that MMM utilizes to construct model portfolios and investment strategies for its clients:

**Industry Analysis:** Identifying current and future industrial trends is one of the fundamental investment strategies at MMM. We look at current and future growth opportunities, potential threats, sustainability, and consistency that may affect individual stocks within an industry or the entire industry as a whole.

**Regional Analysis:** This analysis examines the economic outlook in the major regions of the world as it relates to investment opportunity. We then use this data to properly allocate our portfolios with securities in the region that we find the most suitable.

**Value Analysis:** This concentrates on individual securities to determine their future value in relation to their current price. We do this by examining a company's financial statements, historical earnings, future competitive landscape, etc. This allows us to determine potential price movement and future growth potential.

**Technical Analysis:** This approach looks at basic fundamentals including past market data and charting movements in order to confirm support and resistance price levels, and predict future price movements.

**Active Management Strategy:** MMM is committed to providing regular monitoring of all accounts and portfolios. This includes portfolio rebalancing and strategy updates that reflect real-time market conditions. MMM systematically monitors the global investing climate with particular attention to various news reports, economic outlooks, regulatory changes, and consumer trends.

**Diversification Strategy:** A balanced investment approach includes a mixture of asset types and allocation that fits the needs and risk-tolerances of each investor. MMM utilizes mutual funds and Exchange Traded Products (ETPs), in order to give investors coverage to hundreds or even thousands of individual securities, including various asset types.

**Tactical Allocation Strategy:** A key part of our strategy at MMM is tactical asset allocation that provides every investor with a customized portfolio of assets that represent the risks and desired returns of each client. Portfolio allocation generally includes a mix of equities, bonds and fixed-income assets that suit the investor's special financial needs.

**Time Sensitive Strategy:** A thorough investment strategy always includes a time component that correlates with each client's particular situation. MMM will utilize both short-term and long-term trading in order to provide the most customized services to clients.

Note: All strategies seek to limit risk to the greatest extent possible, however, all investments in securities involve risk of loss that a client should be prepared to bear.

### B: Material Risks Involved

For every analysis and investment strategy there are associated risks. MMM's methods of

analysis and investment strategies generally do not involve significant or unusual amounts of risk. MMM also does not partake in unusually frequent trading of securities that may affect investment performance through increased third party fees. Below are listed the major risks associated with the analyses and strategies used at MMM. They do not totally capture all the risks associated with each method.

**Industry Analysis Risk:** Judgements about an industry can differ and are subject to rapid change. Industry specific threats such as political legislation, consumer trends, and overall economic healthiness may impose risk.

**Regional Analysis Risk:** Judgements about a region's economic and investment suitability are often subject to rapid and unforeseen changes. Some of these risks include international conflict, worsening global economic outlook, and political policy change.

**Value Analysis Risk:** Comparing a company's current financial position to its future value and predicted price movement involves subjective judgement. For this reason, there is inherent risk in value analysis.

**Technical Analysis Risk:** Predicting a security's future price movement according to its past movements is never a certain process. Technical analysis is utilized to help predict these price movements but is not 100% reliable.

**Active Management Strategy Risk:** With all trading activity there are associated fees. Over active management may subsequently incur unwanted fees or timing errors.

**Diversification Strategy Risk:** Though diversification is widely accepted as a risk reducing practice, over-diversification may lead to reduced investment gain.

**Tactical Allocation Risk:** Different assets classes perform differently at any given time. Due to this, there is inherent risk that a portfolio may be over or under exposed to a certain asset class.

**Time Sensitive Strategy Risk:** Setting goals and time horizons are an important part of the investment process. Typically, a shorter time horizon can mean greater risk, depending on the targets of the individual.

### **C. Risks of Specific Securities and Practices**

Investing in securities (stocks, bonds, mutual funds, etc.) always involves risk of loss. MMM does not recommend or utilize any investment vehicles that may result in unreasonable risk. MMM may utilize short selling, margin transactions and options writing; and, clients should be aware that these strategies generally involve increased risk. Clients should be prepared to bear any investment loss, including loss of principle. Past performance is not necessarily indicative of future results. Due to the inherent risks of investing, MMM cannot guarantee that their methods of analysis and strategies or selection of securities will result in positive results, nor insulate a client from market corrections or decline. The associated risks of investing with MMM are described below. They do not totally capture all the risks associated with each security.

#### **Security types:**

**Equity Risk:** The decrease in value of a piece of equity, typically stock. Stock prices fluctuate and are subject to movements that correlate to the value of a particular company. Stock price fluctuations are subject to changes in valuation, perception, or confidence in a stock's future value. Negative perceptions, valuation, and confidence generally decrease a stock's price and possibly a client's investment value.

**Fixed Income and Debt Risk:** These investments typically involve promised fixed periodic payments in the future. There is risk that the issuer will default on the principle, be unable to make payments, or that inflation or interest rates may fluctuate resulting in a change in the value of the security.

**ETF and Mutual Fund Risk:** These investments may bear addition costs associated with trading due to heightened managerial fees outside of MMM. The risk of owning an ETF or mutual fund generally reflects the risk of owning the underlying securities. Mutual funds can include several types of asset classes.

**Options Risk:** Like other securities - including stocks, bonds, and mutual funds - options carry no guarantees, and a person must be aware that it is possible to lose all of the principal he/she invests, and sometimes more. As an option holder, a person risks the entire amount of the premium he/she paid. But as an options writer, a person takes on a much higher level of risk. For example, if a person writes an uncovered call, he/she faces unlimited potential loss, since there is no cap on how high a stock price can rise. However, since initial options investments usually require less capital than equivalent stock positions, potential cash losses as an options investor are usually smaller than if someone bought the underlying stock or sold the stock short. The exception to this general rule occurs when an option is used to provide leverage: Percentage returns are often high, but it is important to remember that percentage losses can be high as well.

#### **Additional Risks:**

**Market Risk:** The stock market or economy as whole may at any time decrease in value or healthiness. This typically results in a decrease in the value of a client's investments. Also, referred to as systemic risk.

**Margin Risk:** Securities purchased on margin are the broker-dealer's collateral for the loan to the client. If the securities in the account decline in value, so does the value of the collateral supporting the loan, and, as a result, the broker-dealer can take action, such as issue a margin call and/or sell securities or other assets in any of the client's accounts held with the member, in order to maintain the required equity in the account. It is important that you fully understand the risks involved in trading securities on margin. These risks include the following:

- The client can lose more funds than deposited in the margin account.
- The broker-dealer can force the sale of securities or other assets in client's account(s).
- The broker-dealer can sell the client's securities or other assets without contacting the client.
- The Client is not entitled to choose which securities or other assets in the account(s) are liquidated or sold to meet a margin call.
- The broker-dealer can increase its "house" maintenance margin requirements at any time and is not required to provide the client advance written notice.
- The client is not entitled to an extension of time on a margin call.

**Managerial Risk:** Inherent risks related to the human judgement exercised at MMM, including timing, asset selection/allocation, and insufficient returns.

## 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 Proceedings**

There are no self-regulatory proceedings to report.

## Item 10: Other Financial Industries and Activities

### **A. Registration as a Broker-Dealer or Broker Dealer Representative**

Neither MMM nor its representatives are registered, or have an application pending to register as broker-dealer or a registered representative of a broker-dealer.

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

Neither MMM nor its representatives are registered, or have an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

### **C. Registration Relationships Material to the Advisory Business and Conflicts of Interest**

Neither MMM nor its representatives have material relationships with any person or entity that might represent a conflict of interest with its clients.

### **D. Selection of Other Advisors, Compensation and Conflicts of Interest**

MMM does not recommend, select, or utilize other investment advisers for its clients or receive compensation for doing so.

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

### **A. Code of Ethics**

MMM has an established Code of Ethics that applies to all clients, prospective clients, and associated persons of MMM. The Code of Ethics at MMM is pursuant to the SEC and State of

Pennsylvania's standards and laws. The core principle and underlying duty of our Code of Ethics is to act as a faithful fiduciary to our clients. This duty includes placing client interest ahead of MMM's interest, disclosing all material facts and information, and always acting with loyalty and in good faith towards the client. In addition, MMM seeks to avoid and reduce possible conflicts of interest at all times, and to conduct manner in the most ethical, fair, and honest way possible. This section is only a summary our MMM's Code of Ethics. All clients and prospective clients are entitled to a copy of the full Code of Ethics and will be provided with such upon request.

## **B. Recommendations Involving Material Financial Interests and Related Persons**

Neither MMM nor its related persons have a material financial interest in a security.

## **C. Personal Investment in Same Securities as Clients**

Representatives of MMM may personally invest in the same securities that they also recommend, buy, or sell on behalf of their clients. This may result in a potential conflict of interest as a representative may have the ability to personally profit from such recommendations or actions. MMM will always act in a manner that puts the client's interests ahead of the firm's interest. MMM will also document any transactions that may be construed as a potential conflict of interest. MMM will generally transact personal business before buying and selling similar securities to its clients in order to limit or avoid potential conflicts of interest.

## **D. Personal Transactions At or Around the Same Time of Clients' Transaction of the Same Security**

Representatives of MMM may buy or sell securities at or around the same time that they also recommend, buy, or sell securities to their clients. This may result in a potential conflict of interest as a representative may have the ability to personally profit from such recommendations or actions. MMM will always act in a manner that puts the client's interests ahead of the firm's interest. MMM will also document any transactions that may be construed as a potential conflict of interest. MMM will generally transact personal business before buying and selling similar securities to its clients in order to limit or avoid potential conflicts of interest.

# **Item 12: Brokerage Practice**

## **A. Factors Used in Broker-Dealer/Custodian Selection**

MMM selects their particular broker foremost according to the fees that will be transferred to its clients for their services. MMM also considers their trading platform for ease of use and functionality, and the types of securities that are offered by the broker/custodian. Support services, custodial services, and reputation are also factors for consideration. MMM will never charge a premium or commission in association with, or in addition to the costs imposed by the broker/custodian. Advisor is not affiliated with the brokerage firm. Broker does not supervise the advisor, its agents, or its activities.

**Research and Soft-Dollar Benefits:**

MMM may receive research and other products/services from its broker/custodian or a third-party, other than transaction execution services. These additional services are referred to as soft dollar benefits, as they are free services provided in addition to the necessary function of the broker/custodian. These additional offerings may provide an incentive for MMM to use a particular broker/dealer. Soft dollar benefits may pose a conflict when a firm chooses a particular broker/custodian based on the soft dollar benefits they offer, rather than choosing a broker/custodian that acts in the best interest of its clients. Favorable execution and affordability is always the foremost consideration in choosing a broker/custodian at MMM. Although MMM may obtain additional products or services, MMM does not pay for these services nor are these services obtained based on the number of clients MMM services, or the amount of assets it has under management.

**Brokerage for Client Referrals:**

MMM does not consider, in selecting or recommending a broker-dealer, whether we or any related person receives client referrals from a broker-dealer or third party.

**Directed Brokerage:**

MMM does require that clients use a firm specified broker-dealer to execute transaction. This arrangement generally lessens complexity and increases transparency in the advisor-client relationship. Not all advisors require that you use their specified broker. MMM and its specified broker-dealer do not have any economic relationship that might create a conflict of interest. By using the broker of our choice, MMM has the ability to execute in the most favorable way including reduced fees and receiving better execution prices. Client direct brokerage may limit our ability to act in the best interest of our clients.

**Aggregate (Block) Trading Across Multiple Account:**

MMM has the ability to make block trades across multiple accounts. This practice allows MMM to execute a large order of securities on behalf of many different clients simultaneously, thus lessening the transactions fees incurred by each client. This process may also be referred to as aggregating orders, batch trading, or block trading. If and when MMM aggregates client orders, the allocation of securities and fees is done in a fair and equitable manner. MMM utilizes block trading whenever it is advantageous to its clients.

## Item 13: Review of Accounts

**A. Periodic Review of Client Accounts and Financial Plans**

Matthew Stearns, Managing Member of MMM, will conduct reviews of client accounts on a quarterly basis, at the minimum. The process involves strategy re-evaluation, portfolio rebalancing, and an allocation critique.

Financial plans will be evaluated on an annual basis, typically in the form of an interpersonal meeting. If no meeting can be had, MMM will review the financial plan and notify the client of any changes and provide a status update.

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

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Special circumstances or individual client inquiries may trigger a non-periodic review of client accounts. These reviews may be triggered by a general change in strategy at MMM, a disruption in the market (economic, political, or otherwise), or a change in a client's financial situation.

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

Clients will be provided transaction confirmation notices (including fee withdrawals), as well as quarterly account statements written and delivered directly from the broker/custodian. MMM may also provide periodic reports summarizing account activity, performance, and strategy changes.

## **Item 14: Client Referrals and Other Compensation**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

Neither MMM nor its representatives receive any economic benefit, directly or indirectly, from a third party for investment advice or any other advisory services.

### **B. Compensation to Non-Advisory Personnel for Client Referrals**

MMM does not directly or indirectly compensate any person who is not supervised personnel in exchange for client referrals.

## **Item 15: Custody**

The term custody refers to having access to or control over a client's funds and/or securities. Though MMM utilizes a qualified custodian, with written authority, MMM may also be considered to have limited custody over a client's funds on the grounds that it may deduct management fees directly from a client's account held by a qualified custodian. The terms and conditions of withdrawal will be detailed in the specific client-advisor relationship agreement, and must be executed prior to MMM taking withdrawals. MMM will send the broker/custodian written notice of the agreed upon client specific fee schedule, including quarterly notice of the amount to be deducted from a client's account, and fees will be deducted accordingly. In addition to a withdrawal transaction notice the broker/custodian and/or MMM will send quarterly written invoices directly to clients itemizing the fee, including any formulas used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based. All clients should carefully review these reports. MMM may also send additional reports to clients and they should compare these reports accordingly. Advisor is not affiliated with the custodian. The custodian does not supervise the advisor, its agents or activities.

## Item 16: Investment Discretion

MMM accepts discretionary trading authority over all investment management accounts. This grants MMM the authority to determine the type and amount of a securities to be bought or sold, without obtaining a client's consent for each transaction. Discretionary authority must be granted before MMM can act upon a client's behalf. Discretionary authority will be granted through the execution of a limited power of attorney written in the client-advisor relationship agreement.

Once discretion is agreed upon, MMM is responsible for all decisions made regarding the trading of investments on the behalf of a client. Clients may, at any time, impose restrictions, in writing, on our discretionary authority (limit the types/amounts of particular securities purchased for their account, limit our use of margin, etc.).

## Item 17: Voting Client Securities

MMM will not require or accept voting authority on behalf of the client. Clients will receive proxies directly from the issuer or custodian. Clients may contact MMM with any questions about proxy votes.

## Item 18: Financial Information

### **A. Balance Sheet**

MMM does not require or solicit prepayment of more than \$500 in fees per client six month or more in advance and therefore does not need to include a balance sheet with this brochure.

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

MMM does not have any financial conditions that are likely to impair the ability to meet contractual commitments to its clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

MMM has not been the subject of a bankruptcy petition at any point during the past ten years.



## Item 19: Requirements for State-Registered Advisers

### **A. Principle Executive Officers, Management Persons, and Their Formal Education and Business Background**

Matthew R. Stearns is the sole owner, executive officer, investment advisor representative, and employee of Millennial Money Management, LLC.

**Year of Birth:** 1993

#### **Education:**

BS/BA International Business; German – Washington & Jefferson College (2015)

#### **Business Background:**

*Millennial Money Management, LLC* – April 2017 to Present

- Managing Member
- Investment Adviser Representative

*Covestro LLC* – June 2015 to June 2016

- Commercial Operations Trainee in sales, logistics, marketing, and product management

### **B. Other Business Engagements and Activities**

Neither MMM nor its representatives are engaged in any other business other than that of MMM.

### **C. Supervision**

Mr. Stearns is the Managing Member and Chief Compliance Officer of the firm. As a result, he has no internal supervision placed over him. However, he is bound by the firm's Code of Ethics with its written policies and procedures.

### **D. Performance Based Fee Calculations, Client Risk, and Additional Compensation**

MMM does not charge or collect any performance-based fees based on capital gains or appreciation in a client's account. Such fees may impose a heightened degree of risk to clients as it may create an incentive for the advisor to recommend abnormally high risk securities. Neither MMM nor its representatives receive any economic benefit, directly or indirectly, from a third party for investment advice or any other advisory services.

### **E. Material Discipline Disclosures for Management Persons**

Neither MMM nor its representatives have 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.
- Neither MMM nor its representatives have ever been the subject of a bankruptcy petition, or legal or disciplinary events material to a client's or prospective client's evaluation of the firm or its employees.

## **F. Material Relationships That Management Persons Have With Issuers of Securities**

Neither MMM nor its management person has any relationship or arrangement with issuers of securities.