



## Women's Wealth LLC

Registered Investment Advisor  
CRD # 305821

P.O. Box 1522  
Tacoma, WA 98401

(206) 499-1330  
[www.womenswealthllc.com](http://www.womenswealthllc.com)

### How this firm is different

Service  
vs  
Sales

Partner  
vs  
Gatekeeper

Slow and steady  
vs  
Fast and fleeting

### Form ADV Part 2A

Firm Brochure  
March 18, 2024

This brochure provides information about the qualifications and business practices of Women's Wealth LLC. Please contact Anh Thu Tran at (206) 499-1330 if you have any questions about the content of this brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about Women's Wealth LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD ("CRD") number, which is 305821.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

**Item 2 - Material Changes**

Since the last annual filing of this Form ADV Part 2A brochure, on February 28, 2023, the following material changes have been made:

- Items 4 and 5 have been updated to provide details surrounding our updated Financial Planning services and fees.
  - **INITIAL - Comprehensive Financial Plan (“Get on track”)** comes in two packages and fees: \$5,000 (individual) / \$7,000 (couple).
  - **ANNUAL – Updated Comprehensive Financial Plan (“Stay on Track”)** come in two packages and fees: \$3,500 (individual) / \$4,500 (couple)
    - **Service and fees have also changed to the following:**

	<b>Services</b>	<b>Fees</b>
<b>2023</b>	<ul style="list-style-type: none"> <li>- Email and phone support</li> <li>- Semi-annual communication with list of key to dos and corresponding due date; next steps; URL links; phone #; etc...</li> <li>- Annual comprehensive financial plan update (25-35 slides “main content”; PDF of PowerPoint)</li> <li>- Annual summary of investment environment for closing year and outlook for upcoming year</li> </ul>	<ul style="list-style-type: none"> <li>- \$2,500 (individual)</li> </ul>
<b>2024</b>	<ul style="list-style-type: none"> <li>- Recommendation Meeting: 2 hours</li> <li>- Updated detailed plan with step-by-step guide (PDF of PowerPoint)                             <ul style="list-style-type: none"> <li>✓ 25-35 slides “main content”</li> <li>✓ 5-10 slides “supporting content”</li> </ul> </li> <li>- Semi-annual communication with list of key to dos and corresponding due date; next steps; URL links; phone #; etc...</li> </ul>	<ul style="list-style-type: none"> <li>- \$3,500 (individual)</li> <li>- \$4,500 (couple)</li> </ul>

- Item 2 - Educational Background and Business Experience has changed from...

<b>2023</b>	Brooks, Hughes & Jones, Inc. dba BHJ Wealth Advisors (11/2016-07/2019) Gig Harbor, WA CERTIFIED FINANCIAL PLANNER™ Practitioner/Investment Advisor Representative
<b>2024</b>	Brooks, Hughes & Jones, Inc. dba BHJ Wealth Advisors (11/2016-07/2019) Gig Harbor, WA Financial Advisor/Investment Advisor Representative

- We have updated our address. Please see Cover Page(s) for additional information.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at (206) 499-1330 to request a copy at any time.

**As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.**

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### **Important Information**

Throughout this document Women’s Wealth LLC may be referred to as “the firm,” “firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “the client,” “client,” etc., and refers to a client engagement involving a single person as well as two or more persons and may refer to natural persons and legal entities. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.).

Our firm maintains a business continuity and succession plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available under separate cover upon request.

## **Item 4 - Advisory Business**

### **Description of Firm**

Women's Wealth LLC is a Washington limited liability company formed in June of 2019 for general business purposes and became registered as an investment advisor (RIA) during October of 2019. We frequently operate under the trade name Women's Wealth. Our firm is not a subsidiary of, nor controls, another financial services industry entity.

Anh Thu Tran, CFP®, MBA is our firm's Principal and Chief Compliance Officer (supervisor). Ms. Tran also maintains majority interest in the firm. Additional information about her and her professional experience may be found in Item 19 of this brochure and her accompanying Form ADV Part 2B brochure supplement.

### **Description of Services**

Our planning services has two key components: 1) Initial – Comprehensive financial plan (“Get on track”) 2) Annual – Updated Comprehensive Financial Plan (“Stay on Track”). Both services provide clients with advice on key topics such as cash flow and budgeting, funding college education, retirement, risk management, estate or tax planning, etc.

An initial interview is conducted with you to discuss your current situation and goals, as well as the scope of our firm's services that may be provided. We will also provide our Form ADV Part 2 firm brochure that includes a statement involving our privacy policy (see Item 11), as well as a brochure supplement about the representative who will be assisting you. Our firm will disclose any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice, such as information found in Items 12 and 14 of this brochure.

If you wish to engage our firm for its services, we must first enter into a written engagement agreement. Thereafter, further discussion and analysis will be conducted to determine financial needs, goals, holdings, etc. Depending on the scope of the engagement, you may be asked to provide copies of the following documents early in the process:

- Wills, codicils and trusts
- Insurance policies, including information about riders, loans and amendments
- Mortgage information
- Tax returns
- Student loans
- Divorce decree or separation agreement
- Current financial specifics including W-2s, 1099s, K-1 statements, etc
- Information on current retirement plans and other benefits provided by an employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements
- Completed risk profile questionnaires or other forms provided by our firm

It is important that we are provided with an adequate level of information and supporting documentation throughout the term of the engagement including but not limited to: source of funds, income levels, and an account holder or attorney-in-fact's authority to act on behalf of the account, among other information that may be necessary for our services.

The information and/or financial statements provided to us need to be accurate. Our firm may, but is not obligated to, verify the information that has been provided to us which will then be used in the advisory process.

## **Financial Planning Services**

For individuals, our financial planning services have two key offerings: 1) Initial – Comprehensive financial plan (“Get on track”) 2) Annual – Updated Comprehensive Financial Plan (“Stay on Track”).

**Initial Comprehensive financial plan** (“Get on track”) is required for all NEW clients. The purpose of the initial comprehensive financial plan is to provide clients: 1) a holistic understanding of their financial situations: assets; liabilities; income; expenses; portfolio (location and allocation); etc 2) determine how best to position assets and address liabilities to achieve BIG life goals. Plan covers key financial focus areas, such as goals, cash flow analysis, debt management, risk management, employee benefits analysis, etc.

**Goals assessment** analyzes the client’s current and future assets and liabilities to determine whether or not you are able to achieve big, life goals: financial independence (FI), retirement, education funding, home purchase. Additionally, review includes proposal of how best to build up or optimize assets while paying down or limiting liabilities to reach goals more quickly and safely.

**Cash flow analysis and debt management** assesses your income and expenses to determine your current surplus or deficit. Based upon the results, we will provide advice on how to capitalize on surplus or address deficit. In addition, we will advise on the prioritization of which debts to repay, based upon such factors as the debt’s interest rate and any income tax ramifications. Recommendations may also be made regarding the appropriate level of cash reserves for emergencies and other financial goals. These recommendations are based upon a review of cash accounts (e.g., checking or savings account, money market funds) for such reserves and may include strategies to save target reserve amounts.

**Risk management** analyzes your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care. Advice may include ways to minimize such risks; the costs and benefits of purchasing insurance versus not purchasing insurance (“self-insuring”).

**Education planning** may include projecting the amount needed to pay for your kids’ college and the best savings strategy for doing so: most appropriate college savings vehicles (e.g., 529, brokerage account); how much to save on a regular basis; where to invest savings. We may also review your financial picture as it relates to eligibility for financial aid.

**Investment** consultation providing information on the types of investment vehicles available, employee retirement plans and/or stock options, investment analysis and strategies, asset selection and portfolio design, as well as some assistance of your investment account. The strategies and types of investments that may be recommended are further discussed in Item 8 of this brochure.

**Employee benefits** analysis assists in determining whether you, as an employee, are taking maximum advantage of your employee benefits. We will also offer advice on your employer-sponsored retirement plan and/or stock options, along with other benefits that may be available to you.

**Retirement planning** typically include projections of your likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, a recommendation may include showing you the impact on those projections by making changes: working longer, saving more, spending less, taking more risk with investments. If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

**Tax planning** review may include ways for you to minimize current and future income taxes. For example, which type of account(s) or specific investments should be owned for their “tax efficiency,” while factoring the possibility of future changes to federal, state or local tax laws and rates that may impact your situation. NOTE: Our firm does not provide accounting or tax preparation services.

**Estate planning and charitable giving** assessment typically includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. We may assess ways to minimize or avoid estate taxes by implementing appropriate estate planning and charitable giving strategies. NOTE: Since we are not a law firm, we encourage you to consult with an experienced attorney when you initiate, update, or complete estate planning activities.

**Ongoing financial planning support via Annual – Updated Comprehensive Financial Plan (“Stay on Track”)** is only available to clients who have completed a comprehensive financial plan with our firm. The purpose of ongoing financial planning support is to help clients: 1) get ahead of their finances rather than behind it 2) get a gut-check from a financial professional so as to make more informed decisions 3) respond rather than react to big life changes (e.g., promotion, inheritance, home purchase) 4) be held accountable to key plan milestones/targets most impactful to their financial well-being 5) stay on track towards achieving BIG life goals.

We strongly urge clients going through a big personal/professional change to schedule a financial plan update. For all other clients, we recommend annual reviews as personal, professional and financial situations as well as tax laws, retirement plan laws, estate laws, etc, constantly change. The purpose of ongoing, annual plan updates is to help ensure that your plan reflects your current situation and is optimized to help you achieve your goals.

**Financial Advisory Services**

For businesses (e.g., non-profit, for-profit, small business), our financial advisory services have two key offerings: 1) financial well-ness training and support to employees 2) analysis and recommendation on employee benefits (e.g., retirement plan, health insurance). Services are billed on an ad hoc project basis (\$300/hour).

**Item 5 - Fees and Compensation**

Forms of payment are based on the types of services being provided, term of service, etc., and will be stated in your engagement agreement with our firm. NOTE: Similar services may be made available from other firms and potentially at lower fees.

Our Firm only accepts ACH payment, which requires Client’s prior authorization. ACH payment may be made through a qualified, unaffiliated PCI compliant<sup>1</sup> third-party processor, or withdrawal from the Client’s investment account held at the Custodian of Record.

**Financial Planning**

**INITIAL – Comprehensive Financial Plan (“Get on Track”):** We offer comprehensive financial planning packages for a fixed fee (below).

**INITIAL – Comprehensive Financial Plan (“Get on Track”)**

<b>Professional Stage / Life Goal</b>	<b>Pursue Financial Independence (FI)</b>	<b>Catch up</b> <i>(“How do I prioritize my finances so I can achieve</i>	<b>Sunset</b> <i>(“How do I set myself up for a successful</i>
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<sup>1</sup> We do not retain debit/credit card data. For an explanation of the term “PCI,” the PCI Security Standards Council, and comprehensive standards to enhance payment card data security, go to [https://www.pcisecuritystandards.org/security\\_standards/index.php](https://www.pcisecuritystandards.org/security_standards/index.php)

	<i>("How do I make the most of my financial lead to pursue meaningful work; flexibility; travel; spend more time with family; etc?")</i>	<i>my goals while fulfilling my responsibilities?")</i>	<i>retirement? It's my turn!")</i>
<b>Recommendation Meeting*</b>	2 hours (individual) / 3 hours (couple)		
<b>Deliverable</b>	<ul style="list-style-type: none"> <li>● Detailed plan with step-by-step guide (PDF of PowerPoint) <ul style="list-style-type: none"> <li>○ 35-45 slides "main content"</li> <li>○ 10-15 slides "supporting content"</li> </ul> </li> </ul>		
<b>Focus Areas</b>	<ul style="list-style-type: none"> <li>● Goals Assessment</li> <li>● Cash Flow and Budgeting</li> <li>● Debt Management</li> <li>● Risk Management</li> <li>● Education Planning</li> <li>● Investment Consultation</li> <li>● Employee Benefits</li> <li>● Retirement Planning</li> <li>● Tax Planning</li> <li>● Estate Planning &amp; Charitable Giving</li> </ul>		
<b>Fee</b>	\$5,000 (individual) / \$7,000 (couple)		

**ANNUAL – Updated Comprehensive Financial Plan ("Stay on Track")**

This ongoing financial planning support is only available to clients who have completed a comprehensive financial plan with our firm.

<b>ANNUAL – Updated Comprehensive Financial Plan ("Stay on Track")*</b>			
<b>Professional Stage / Life Goal</b>	<b>Pursue Financial Independence (FI)</b> <i>("How do I make the most of my financial lead to pursue meaningful work; flexibility; travel; spend more time with family; etc?")</i>	<b>Catch up</b> <i>("How do I prioritize my finances so I can achieve my goals while fulfilling my responsibilities?")</i>	<b>Sunset</b> <i>("How do I set myself up for a successful retirement? It's my turn!")</i>
<b>Recommendation Meeting</b>	2 hours (individual) / 3 hours (couple)		
<b>Services and Deliverable</b>	<ul style="list-style-type: none"> <li>● Updated detailed plan with step-by-step guide (PDF of PowerPoint) <ul style="list-style-type: none"> <li>○ 25-35 slides "main content"</li> <li>○ 5-10 slides "supporting content"</li> </ul> </li> <li>● Semi-annual communication with list of key to dos and corresponding due date; next steps; URL links; phone #; etc...</li> </ul>		
<b>Focus Areas</b>	<ul style="list-style-type: none"> <li>● Goals Assessment</li> <li>● Cash Flow and Budgeting</li> </ul>		

	<ul style="list-style-type: none"> <li>● Debt Management</li> <li>● Risk Management</li> <li>● Education Planning</li> <li>● Investment Consultation</li> <li>● Employee Benefits</li> <li>● Retirement Planning</li> <li>● Tax Planning</li> <li>● Estate Planning &amp; Charitable Giving</li> </ul>
<b>Fee</b>	\$3,500 (individual) / \$4,500 (couple)

*\* Clients who had done an initial comprehensive financial plan (“Get on Track”) but opted out of annual updated comprehensive financial plan (“Stay on Track”) for more than 2 years will need to (re)do a comprehensive financial plan (“Get on Track – Again”) for fee of \$5,000(individual) / \$7,000 (couple) due to major changes in situation over time.*

For both financial planning services, we require a deposit (one-half of package fee) upon engaging the firm for its financial planning services. The balance is due upon delivery of the plan or advice. Our financial planning invoice will be provided each time we assess our fee, and it will include the fee to be charged, the formula used to calculate our fee, the time period covered by the fee and the fee calculation itself. A plan will be provided to you within six months of initiating the engagement.

**Service/Fee Options**

Options	Service/Fee	Objective	Client Needs
<b>OPTION A</b>	Comprehensive Financial Plan (\$5,000 / \$7,000)	One and done	<i>“Thanks for the financial blueprint. I’m going to run with it.”</i>
<b>OPTION B</b>	<p><b>INITIAL</b> – Comprehensive Financial Plan (\$5,000 / \$7,000)</p> <p><b>ANNUAL</b> – Updated Comprehensive Financial Plan (\$3,500 / \$4,500)</p>	One and ongoing until financial well-being becomes habit...	<i>“I want to become my own financial planner.”</i>
<b>OPTION C</b>	<p><b>INITIAL</b> – Comprehensive Financial Plan (\$5,000 / \$7,000)</p> <p><b>AS NEEDED</b> – Comprehensive Financial Plan (\$5,000 / \$7,000)</p>	One and done...for a while until life events warrant redo.	<p><i>“Thanks for the financial blueprint. I’m going to run with it for now.</i></p> <p><i>Should my life, work and money change radically, I’ll follow-up for redo.”</i></p>

*\* **Difference between Option B and Option C:** Clients who had done an initial comprehensive financial plan (“Get on Track”) but opted out of annual updated comprehensive financial plan (“Stay on Track”) for more than 2 years will need to (re)do a comprehensive financial plan (“Get on Track – Again”) for fee of \$5,000 (individual) / \$7,000 (couple) due to major changes in situation over time.*

**Financial Advisory Service**

Our financial advisory service is available to non-profits, for-profits and/or small businesses seeking to offer:



1) financial well-ness training and support to employees and/or 2) analysis and recommendation on employee benefits (e.g., retirement plan, health insurance). Services are billed on an ad hoc project basis (\$300/hour).

### **External Compensation Involving Transactions**

Women's Wealth and its personnel do not charge or receive a commission or mark-up on your securities transactions or insurance contract purchases, nor do we receive "trails" or SEC Rule 12b-1 fees from a mutual fund company we may recommend. See Item 8 for the types of securities that we recommend. Our clients retain the right to purchase recommended or similar investments through a service provider (e.g., brokers and agents) of their own choice.

### **Termination of Services**

An agreement is considered entered into when all parties to the agreement have signed it. However, either party may terminate the agreement at any time by communicating the intent to terminate in writing. For financial planning clients who choose to terminate the agreement, we will assess our hourly fee for work completed up to the date of termination and will refund any unearned pre-paid fees or will bill for any hours worked but not yet paid for. Additionally, we will deliver the partial project or financial plan developed up to the date of termination.

Additionally, our firm will not be responsible for investment allocation, advice or transactional services upon receipt of a termination notice.

If a client of our firm does not receive our Form ADV Part 2 firm brochure at least 48 hours prior to entering into our firm's agreement, then that client will have the right to terminate the engagement by written notice without fee and penalty within five (5) business days after entering into the contract.

In all instances, we will send 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.

We will return any prepaid, unearned fees within 30 days of termination notice.

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

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

### **Item 7 - Types of Clients**

Here's the profile of the "typical" client:

- White-collar professional
- Key industry: Tech, healthcare, non-profit/public sector
- High income (individual: \$150K/yr. – \$200K/yr.; couple: \$250K/yr. – \$350K/yr.),
- And/or, high net worth: millionaires (\$1M), if not multimillionaires (\$2M+)
- Half of clients are immigrants or children of immigrants.
- Most have life or legal partner, but many prefer to retain control and autonomy over their own finances.

We reserve the right to decline services to any prospective client for nondiscriminatory reasons.

### **Item 8 - Methods of Analysis, Investment Strategy/Philosophy and Risk of Loss**

#### **Methods of Analysis**

We employ what we believe to be an appropriate blend of fundamental, technical and cyclical analyses. Fundamental analysis is a method of measuring a security's intrinsic value by examining related economic and financial factors. Fundamental analysis factors in anything that can affect the security's value, from

macroeconomic factors, such as the state of the economy and industry conditions, to microeconomic factors, like the effectiveness of the company's management. Technical and cyclical analysis involve studying the historical patterns and trends of securities, markets, industries or economies individually and holistically to try and determine potential future behaviors, including the direction of price movements of such securities, markets, etc. Our research is often drawn from sources that include financial periodicals and research reports from economists and other industry professionals.

### **Investment Strategy/Philosophy**

Our investment strategy is based on Modern Portfolio Theory wherein we try to reduce risk by diversifying among a range of asset classes, such as domestic and international equities, fixed-income securities, and real estate (REITs), if necessary. We believe a well-diversified portfolio coupled with a buy-and-hold strategy and annual rebalancing will most likely provide clients with more stable and consistent return over time.

This is our investment philosophy in a nutshell – **“Successful investing is counter-intuitive”**:

- Buy low, sell high.
- Be a contrarian. When others zig, find the willpower to zag.
- Passive (mostly) vs active.
- Buy and hold (10 yrs. or more).
- Time in the market is far more important than timing the market.
- Diversification is the only free lunch; increase return while decreasing risk.
- Limit your downside (risk) and the upside will take care of itself.
- Shoot for average (via passive/index funds), and you will beat 80-90% of investors who chase returns via active trading/management over a 10-yr period. (Source: S&P Indices versus Active (SPIVA) US Scorecard, 2022.)
- Slow and steady wins the race...**always**.

### **Risk of Loss**

Our firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk. However, there is no guarantee that a planning goal or investment objective will be achieved. Past performance is not necessarily indicative of future results. Investing in securities involves risk of loss that clients should be prepared to bear. While the following list is not exhaustive, we provide examples of key risks that we consider when reviewing and making recommendations for revisions to your portfolio. As is, we believe it is important that our clients review and consider each prior to investing and/or implementing our recommendations.

### **Active Management**

While not a strategy typically employed by our firm, it is important to point out that a portfolio employing active management strategies can either outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management may require more frequent trading or “turnover.” This may result in shorter holding periods, higher transactional costs and/or taxable events generally borne by the investor and, thereby, potentially reduce or negate certain benefits of active asset management.

### **Company Risk**

When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as **unsystematic risk** and can be reduced or mitigated through diversification.

### **Cyclical Analysis Risks**

Cyclical analysis (form of technical analysis) may experience risk due to an economic cycle that may not be as predictable as projected; many fluctuations may occur between long-term expansions and contractions. The length of an economic cycle may be difficult to predict with accuracy and, therefore, the risk of cyclical analyses is the difficulty in predicting economic trends. Consequently, the changing value of securities is affected.

### **Currency Risk**

The risk of loss from fluctuating foreign exchange rates when a portfolio has exposure to foreign currency or in foreign currency traded investments is known as currency risk.

### **Emerging Markets Securities Risks**

Investments in emerging markets securities are considered speculative and subject to heightened risks in addition to the general risks of investing in foreign securities. Unlike more established markets, emerging markets may have governments that are less stable, markets that are less liquid, and economies that are less developed. In addition, the securities markets of emerging market countries may consist of companies with smaller market capitalizations and may suffer periods of relative illiquidity; significant price volatility; restrictions on foreign investment; and possible restrictions on repatriation of investment income and capital. Furthermore, foreign investors may be required to register the proceeds of sales, and future economic or political crises could lead to price controls, forced mergers, expropriation or confiscatory taxation, seizure, nationalization, or creation of government monopolies.

### **Equity (Stock) Risk**

Common stocks are susceptible to general stock market fluctuations and to volatile increases or decreases in value as market confidence in and perceptions of their issuers change. If an investor held common stock or common stock equivalents of any given issuer, they may be exposed to greater risk than if they held preferred stocks and debt obligations of the issuer.

Preferred stocks can be affected by interest rate and liquidity risks (described in adjacent paragraphs). Also note that their dividend payment is not guaranteed. Some are subject to a call provision, meaning the issuer can redeem its preferred shares on demand, and usually when interest rates have fallen.

### **ETF and Mutual Fund Risks**

The risk of owning ETFs and mutual funds reflect their underlying securities (e.g., stocks, bonds, derivatives, etc.). These forms of securities typically carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. Certain ETFs and indexed funds have the potential to be affected by “active risk”; a deviation from its stated index (e.g., S&P 500).

While many ETFs and index mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be a holding within an ETF or mutual fund), may be considered “non-qualified” under certain tax code provisions. A holding’s QDI will be considered when tax-efficiency is an important aspect of the client’s portfolio.

Leveraged and/or inverse ETFs attempt to achieve multiples of the performance of an index or benchmark through the opposite (inverse) of the performance of the tracked index or benchmark. This strategy attempts to profit from, or hedge exposures to, downward drifting markets. There is risk involving this strategy and part of the concern is based on the fact that leveraged and inverse exchange traded funds "reset" daily, which means they are designed to achieve their stated objectives on a *daily basis*. It is due to the compounding effect of daily

adjustments that ETF performance over longer periods of time can differ significantly from the performance (or inverse of the performance) of an underlying index or benchmark during the same period. This effect is potentially magnified during volatile markets. If effects contrary to the ETF strategy occur, losses may be significant; therefore, leveraged and/or inverse ETFs will be considered for portfolios either properly hedged or for clients able to sustain potentially higher risks. Leveraged and inverse ETFs will not be used in portfolios where a "buy-and-hold" philosophy is important.

### **Failure to Implement**

Our clients are free to accept or reject any or all of the recommendations. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their plan may face an increased risk that their stated goals and objectives will not be achieved.

### **Financial Risk**

Excessive borrowing to finance a business operation increases profitability risk, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

### **Financial Sector Risk**

Performance of companies in the financial sector may be adversely impacted by many factors, including government regulations, economic conditions, credit rating downgrades, changes in interest rates, and decreased liquidity in credit markets. The impact of more stringent capital requirements, recent or future regulation of any individual financial company, or recent or future regulation of the financial sector as a whole cannot be predicted. In recent years, cyber-attacks and technology malfunctions have become increasingly frequent in this sector and have caused significant losses to companies in this sector, which may negatively impact an account.

### **Fixed Income Risks**

Various forms of fixed income instruments, such as bonds, money market or bond funds may be affected by various forms of risk, including:

- **Credit Risk** - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.
- **Interest Rate Risk** - The risk that the value of the fixed income holding will decrease because of an increase in interest rates.
- **Reinvestment Risk** - With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

### **Foreign Securities Risk**

Investments in securities of foreign companies (including direct investments as well as investments through American Depositary Receipts or ADRs) can be more volatile than investments in U.S. companies. Diplomatic, political, or economic developments, including nationalization or appropriation, could affect investments in foreign companies. Foreign securities markets generally have less trading volume and less liquidity than U.S. markets. In addition, the value of securities denominated in foreign currencies, and of dividends from these securities, can change significantly when foreign currencies strengthen or weaken relative to the U.S.

dollar. Financial statements of foreign issuers are governed by different accounting, auditing, and financial reporting standards than the financial statements of U.S. issuers and may be less transparent and uniform than in the United States. Thus, there may be less information publicly available about foreign issuers than about most U.S. issuers. Transaction costs generally are higher than those in the United States and expenses for custodial arrangements of foreign securities may be somewhat greater than typical expenses for custodial arrangements of similar U.S. securities. Some foreign governments levy withholding taxes against dividend and interest income. Although in some countries a portion of these taxes is recoverable, the non-recovered portion will reduce the income received from the securities comprising an account's portfolio. These risks may be heightened with respect to emerging market countries since political turmoil and rapid changes in economic conditions are more likely to occur in these countries.

### **Fundamental Analysis**

The challenge involving fundamental analyses is that information obtained may be dated or incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

### **Inflation Risk**

Also called **purchasing power risk**, is the chance that the cash flows from an investment won't be worth as much in the future (or have the same purchasing power) due to inflation.

### **Information Technology Sector Risk**

Information technology companies face intense competition, both domestically and internationally, which may have an adverse effect on profit margins. As with other technology companies, information technology companies may have limited product lines, markets, financial resources, or personnel. The products of information technology companies may face obsolescence due to rapid technological developments, frequent new product introduction, unpredictable changes in growth rates, and competition for the services of qualified personnel. Companies in the information technology sector are heavily dependent on patent and intellectual property rights. The loss or impairment of these rights may adversely affect the profitability of these companies.

### **Liquidity Risk**

The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks that may occur, such as when an issue trading in any given period does not readily support buys and sells at an efficient price.

### **Market Risk**

This is also called systemic risk. In cases where markets are under extreme duress, many securities lose their ability to provide diversification benefits.

### **Passive Investing**

A portfolio that employs a passive, efficient markets approach has the risk of generating lower-than-expected returns due to its broad diversification when compared to a portfolio more narrowly focused.

### **Political Risk (aka "Geopolitical Risk")**

This is the risk of financial and market loss, because of political decisions or disruptions in a particular country or region.

### **Research Data**

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

### **Sequence of Return Risk**

The risk of receiving lower or negative returns early on in financial independence (FI) or retirement when withdrawals are made from an individual's underlying investments.

### **Small- and Mid-Capitalization Company Risk**

The small- and mid-capitalization companies in which an account may invest may be more vulnerable to adverse business or economic events than larger, more established companies. In particular, investments in these small- and mid-sized companies may pose additional risks, including liquidity risk, because these companies tend to have limited product lines, markets and financial resources, and may depend upon a relatively small management group. Small- and mid-cap stocks, therefore, may be more volatile than those of larger companies. These securities may be traded over the counter (OTC) or listed on an exchange.

### **Technical Analysis**

The risk of investing based on technical analysis is that they may not consistently predict a future price movement; the current price of a security may reflect all known information. A change in the market price of a security may follow a random pattern and may not be as predictable as desired. This may occur due to analyst bias or misinterpretation, a sector analysis error, late recognition of a trend, etc.

### **Item 9 - Disciplinary Information**

Neither the firm nor its management has been involved in any criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding.

### **Item 10 - Other Financial Industry Activities and Affiliations**

Our firm will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest involving its business relationships that might reasonably compromise its impartiality or independence.

Our advisory firm and its management are not registered nor have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm or associated person of such a firm. We are not required to be registered with such entities, nor do they supervise our firm, its activities or our associates. Our firm does not have a material relationship with any of the following types of entities:

- accounting firm or accountant
- another investment advisor, to include financial planning firms, municipal advisors, sub-advisors or third-party investment managers; nor do we refer, select or utilize their services
- bank, credit union or thrift institution, or their separately identifiable department or division
- insurance company or agency
- lawyer or law firm
- pension consultant
- real estate broker, dealer or advisor
- sponsor or syndicator of limited partnerships

- trust company
- issuer of a security, to include investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)

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

**Women’s Wealth is a fiduciary.** Our firm and its associates will act in the utmost good faith, performing in a manner believed to be in the best interest of our clients. We think that our business methodologies, ethics rules, and adopted policies are designed to eliminate or at least minimize material conflicts of interest, and to appropriately manage any remaining, material conflicts of interest.

It is important to point out that no set of rules can anticipate or relieve all material conflicts of interest. Our firm will disclose to its advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees that could reasonably impair the rendering of unbiased, objective advice.

#### **Code of Ethics**

We have adopted a Code of Ethics that establishes policies for ethical conduct for our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Firm policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. We periodically review and amend our Code of Ethics to ensure that they remain current, and we require firm personnel to annually attest to their understanding of and adherence to the firm’s Code of Ethics. A copy of the firm’s Code of Ethics is made available to any client or prospective client upon request.

#### **CFP® Principles**

Firm associates that are CERTIFIED FINANCIAL PLANNER™ Practitioners also adhere to the Certified Financial Planner Board of Standards, Inc.’s Code of Ethics & Professional Responsibility which you may find at [www.cfp.net](http://www.cfp.net).

#### **Privacy Policy Statement**

We respect the privacy of all clients and prospective clients (collectively termed “customers” per federal guidelines), both past and present. It is recognized that clients have entrusted our firm with non-public personal information, and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

- Information provided to us to complete their plan or investment recommendation;
- Information provided via engagement agreements and other documents completed in connection with the opening and maintenance of an account;
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about client transactions.

The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our customers have requested;
- When our customers have specifically authorized us to do so;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information. Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices is confidential and they are instructed not to discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes providing information about a family member's account. The firm will provide customers with its privacy policy on an annual basis and at any time, in advance, if firm privacy policies are expected to change.

#### **Firm Recommendations and Conflicts of Interest**

Our associates are prohibited from borrowing from or lending to a client.

Neither our firm nor its associates are authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a "related person" (e.g., associates, their immediate family members, etc.) has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc. Our firm does not trade for its own account (e.g., proprietary trading). The firm's related persons may buy or sell securities that are the same as, similar to, or different from, those recommended to clients for their accounts, and this poses a conflict of interest. We mitigate this conflict by ensuring that we have policies and procedures in place to ensure that the firm or a related person will not receive preferential treatment over a client. In an effort to reduce or eliminate certain conflicts of interest involving personal trading (e.g., trading ahead of client recommendation or transaction, cross-trades, etc.), firm policy requires that we periodically restrict or prohibit related parties' transactions. Any exceptions must be approved in writing by our Chief Compliance Officer, and personal trading accounts are reviewed on a quarterly or more frequent basis. Please refer to Item 6 of any accompanying Form ADV Part 2B brochure supplement for further details.

Our firm is able to provide a range of services to all of our clients. Due to our firm's ability to offer two or more services and receive a fee for the engagement, a conflict of interest exists due to the extended services provided. We therefore note that you are under no obligation to act on our recommendations and, if you elect to do so, you have the right to complete them through a provider of your choosing.

#### **Item 12 - Brokerage Practices**

##### **Factors Used to Select Broker/Dealers for Client Transactions**

As a fee only financial planning firm that does not offer Investment Management Services, Women's Wealth LLC, does not have any affiliation with Broker-Dealers.

Your accounts must be separately maintained by a qualified custodian (e.g., broker/dealer, futures commission merchant, national bank, trust company) that is frequently reviewed for its capabilities to serve in that capacity by their respective industry regulatory authority.

Our firm is not a custodian, there is not an affiliate that is a custodian, nor does a custodian supervise our firm, its activities or our associates. We do not receive client referrals from a broker/dealer or custodian, nor are client referrals a factor in our recommendation of a broker/dealer or custodian.

When engaged to provide an investment consultation component of our financial planning service, we may recommend the qualified custodian where client assets are currently maintained. If a client prefers a new service provider, a recommendation made by the firm would be based on client need, overall cost, and ease of use.



### **Item 13 - Review of Accounts**

Our financial planning service consists of: 1) Initial – Comprehensive financial plan (“Get on track”) 2) Annual – Updated Comprehensive Financial Plan (“Stay on Track”). Both services are offered on a fixed fee basis as noted in Item 5 of this brochure. Review of assets, accounts and holdings will take place during the initial comprehensive financial plan and annual financial plan update via ongoing support.

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

We do not engage in solicitation activities. If we receive or offer an introduction to a client, we do not pay or earn a referral fee, nor are there established quid pro quo arrangements. Each client has the right to accept or deny such referral or subsequent services.

### **Item 15 - Custody**

Women’s Wealth does not maintain and/or have custody of clients’ accounts. Clients’ accounts will be maintained by an unaffiliated, qualified custodian of the clients’ own choosing. In keeping with this policy involving our clients’ funds or securities, our firm:

- Prohibits the firm or an associate from serving as trustee or having general power of attorney over a client account;
- Does not accept or forward client funds or securities (i.e., stock certificates) erroneously delivered to our firm; and
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future.

Clients are reminded that if they receive a report from any source that includes investment performance information, they are urged to carefully review and compare the report with their account statements that they have received directly from their custodian of record.

### **Item 16 - Investment Discretion**

We do not provide investment management services, and therefore do not exercise discretion. Clients are to execute trades on a self-directed basis.

### **Item 17 - Voting Client Securities**

Women’s Wealth does not provide investment management services. Our firm does not vote proxies on a client’s behalf; nor do we offer specific guidance on how to vote proxies. We will not offer guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets. However, we will answer limited questions via a scheduled meeting with respect to what a proxy voting request or other corporate matter may be and how to reach the issuer or its legal representative.

Account holders maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to their holdings. You should consider contacting the issuer or your legal counsel involving specific questions you may have with respect to a particular proxy solicitation or corporate action.

### **Item 18 - Financial Information**

Engagements with our firm do not require the collection of fees from you of \$500 or more for our financial planning and/or advisory services that have been agreed to be performed six months or more into the future.

Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition in the past 10 years.

### **Item 19 - Requirements for State-Registered Advisers**

Principal Executives and Management Persons – Anh Thu Tran. Please see Item 4 of this brochure and the cover page (Item 1) of the accompanying Form ADV Part 2B that immediately follows this firm brochure.

Other Business Activities – Ms. Tran is not involved in other business activities.

Performance-Based Fees – There are none. Please see Item 6 of this brochure and Item 5 of the accompanying Form ADV Part 2B that immediately follows this firm brochure. Neither the firm nor its management is compensated based on performance-based fees. It is perceived that performance-based compensation may create an incentive for an advisor to recommend an investment that may carry a higher degree of risk to a client; an activity contrary to the firm's business practices.

Material Disclosure Matters involving Firm Management – There are none to report. Please refer to Item 9 of this firm brochure and Items 3 and 7 of the accompanying Form ADV Part 2B supplement that immediately follows this brochure. The firm's management has not been the subject of 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.

Firm management has not been the subject of 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.

Material Relationship with an Issuer of a Security - Please refer Item 10 of this firm brochure and Item 4 of the accompanying Form ADV Part 2B supplement. The firm and its management do not have a material relationship with the issuer of a security.

## Women's Wealth LLC

Registered Investment Advisor  
CRD # 305821

P.O. Box 1522  
Tacoma, WA 98401

(206) 499-1330

[www.womenswealthllc.com](http://www.womenswealthllc.com)

## Anh Thu Tran, CFP<sup>®</sup>, MBA

Principal  
Managing Member  
Chief Compliance Officer  
Investment Advisor Representative  
CRD # 6724447

## Form ADV Part 2B

Brochure Supplement  
March 18, 2024

This brochure provides information about Anh Thu Tran that supplements Women's Wealth LLC Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact Ms. Tran at (206) 499-1330 if you did not receive the full brochure or if you have any questions about the contents of this supplement. Additional information about Anh Thu Tran is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) under CRD # 6724447.

## **Item 2 - Educational Background and Business Experience**

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

### **Principal Executive Officers and Management Persons**

#### **Principal/Managing Member/Chief Compliance Officer/Investment Advisor Representative**

Anh Thu Tran

Year of Birth: 1975

CRD Number: 6724447

### **Educational Background and Business Experience**

#### **Educational Background**

CERTIFIED FINANCIAL PLANNER™ Practitioner, CFP Board of Standards, Inc. (2018) <sup>1</sup>

Uniform Investment Adviser Law Examination, NASAA Series 65 (2017) <sup>2</sup>

Master of Business Administration, Purdue University; West Lafayette, IN (2003)

Bachelor of Arts, University of Notre Dame; South Bend, IN (1996)

#### **Business Experience**

Women's Wealth LLC (06/2019-Present)

Tacoma, WA

Chief Compliance Officer/Investment Advisor Representative (10/2019-Present)

Managing Member/Principal (06/2019-Present)

Brooks, Hughes & Jones, Inc. dba BHJ Wealth Advisors (11/2016-07/2019)

Gig Harbor, WA

Financial Advisor/Investment Advisor Representative

Russell Investment Group, LLC via The Adecco Group (11/2013-08/2016)

Seattle, WA

Senior Program Manager

## **Item 3 - Disciplinary Information**

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to your evaluation of each officer or a supervised person providing investment advice.

Anh Thu Tran has not been the subject of any such event.

## **Item 4 - Other Business Activities**

Ms. Tran is not involved in other business activities.

## **Item 5 - Additional Compensation**

Neither our advisory firm nor Ms. Tran are compensated for advisory services involving performance-based fees. Firm policy does not allow associated persons to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to firm clients.

## Item 6 - Supervision

Anh Thu Tran serves as the firm's Chief Compliance Officer. Because supervising one's self poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict. Questions relative to the firm, its services or this Form ADV Part 2 may be made to the attention of Ms. Tran at (206) 499-1330. Additional information about the firm, other advisory firms, or an associated investment advisor representative is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD or CRD number. The IARD number for Women's Wealth is 305821. Ms. Tran's CRD number is 6724447. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Washington Department of Financial Institutions' Securities Division at (360) 902-8760.

## Item 7 - Requirements for State-Registered Advisers

There have been neither awards nor sanctions or other material matters where Anh Thu Tran or **Women's Wealth** has been found liable in an arbitration, self-regulatory or administrative proceeding. Neither Ms. Tran nor Women's Wealth has been the subject of a bankruptcy petition.

## Information about Professional Designations and Education

<sup>1</sup> The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

<sup>2</sup> North American Securities Administrators Association (NASAA) examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of an industry examination does not constitute or imply a person is "approved" or "endorsed" by a state, federal or industry regulatory body.