



## Form ADV Part 2A – Firm Disclosure Brochure

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**Effective: October 1, 2024**

All the material within this Brochure must be reviewed by those who are considering becoming a client of our firm. This Brochure provides information about the qualifications and business practices of Abich Financial Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (571) 577-9968. In accordance with federal and state regulations, this Brochure is on file with the appropriate securities regulatory authorities as required. The information provided within this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States, or by the United States Securities and Exchange Commission. 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 Abich Financial Wealth Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and be searched by CRD # 310633. Registration as an investment advisor does not imply a certain level of skill or training.

## Item 2 – Material Changes

This Disclosure Brochure contains information regarding our qualifications, business practices, nature of the advisory services we provide, as well as a description of potential conflicts of interest relating to our advisory business that could affect a client's account with us. You should rely on the information contained in this document or other information that we have referred you to. We have not authorized anyone to provide you with information that is different. We encourage all current and prospective clients to read this Disclosure Brochure and discuss any questions you have with us. Should you have any additional questions or concerns regarding Abich Financial Wealth Management or the contents of this Brochure, please contact Angela Mari, Chief Compliance Officer by phone at (571) 577-9968 or by email at [angela@abichfinancial.com](mailto:angela@abichfinancial.com).

We have made the following material change since our last Brochure amendment dated August 15, 2023.

Our firm has added standalone financial planning and consulting services to our services offered to our clients, please see Item 4 and Item 5 for additional information.

Our firm compensates persons not employed by Abich Financial Wealth Management for referring clients to our firm, please see Item 14 for additional information.

### **Full Brochure Available**

From time to time, we amend this Disclosure Brochure to reflect changes in business practices, regulations and other routine updates as required by the respective regulators. This complete Disclosure Brochure or a Summary of Material Changes will be provided to you annually and/or if a material change occurs. Annually, a complete Disclosure Brochure will be offered to Clients along with a summary of material changes, if any, within 120 days of the firm's fiscal year-end.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD# 310633. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (571) 577-9968 or by email at [angela@abichfinancial.com](mailto:angela@abichfinancial.com).

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Abich Financial Wealth Management, LLC (referred to as “we,” “our,” “us,” “firm,” “Abich Financial Wealth Management” or “Advisor”) is a registered investment advisor with the US Securities and Exchange Commission (“SEC”) under the laws of the State of Virginia. The firm was organized in September of 2020 and registered as an independent investment advisor to offer comprehensive financial planning and tailored investment advice in May 2022.

Abich Financial Wealth Management, LLC is owned 100% by Abraham Abich, who earned his bachelor’s degree in business marketing from Liberty University. Mr. Abich serves as the President and is an Investment Adviser Representative of Abich Financial Wealth Management, LLC.

### **B. Advisory Services Offered** **Investment Management Services**

Investment advisor representatives of Abich Financial Wealth Management review investment portfolios on a regular basis and re-balance them periodically; considering tax implications. Regular communication and monitoring allows the firm to adjust the strategy as circumstances change and/or market forces may dictate.

Abich Financial Wealth Management, through its investment advisor representatives, provides ongoing investment advice and management on assets in the client’s custodial accounts. During the account opening process, the firm obtains a client’s financial information, risk tolerance, and investment goals to allocate assets in a diversified portfolio. Investment management advice can be discretionary, limited discretionary or non-discretionary as indicated in the client account agreement.

- **Discretionary Authority** – Client grants Advisor ongoing and continuous discretionary authority to execute its investment recommendations without the Client's prior approval of each specific transaction. Under this authority, Client shall allow Advisor to purchase and sell securities and instruments in this Account(s), arrange for delivery and payment in connection with the foregoing, select and retain sub-advisors, and act on behalf of the Client in all matters necessary or incidental.

In limited circumstances, clients may place certain restrictions on investing in certain securities or types of securities. More specific account information and acknowledgements are further detailed on the account application. Financial planning is incorporated in the asset management service.

The firm requires a minimum of \$500,000 in investible assets for comprehensive planning with no minimum required account balance. Abich Financial reserves the right to accept clients under the minimum if the Advisor feels the client is a proper fit for the services provided.

### **Selection of Other Advisors**

#### *Impact Partnership Wealth*

We have a sub-advisory relationship with Impact Partnership Wealth (“IPW”), an unaffiliated investment advisor (CRD#

313928/SEC# 801-121239). In exercising our discretion in making investment decisions for our clients, we may determine that it is in a client's best interest to engage IPW to implement all or a portion of the client's account. If Advisor determines that engaging IPW is in a client's best interest, we will provide the client IPW's relevant disclosure documents, including Form ADV 2A, privacy policy and any other document necessary to provide a complete description of IPW's services and fees. As described in IPW's Form ADV 2A, IPW charges a flat-rate investment advisory fee based on assets under management. IPW bills in arrears (at the end of the billing period) on a monthly basis, and the advisory fee is calculated based on the average daily balance of the Account(s) during the current billing period. IPW's investment advisory fee will be paid out of the investment advisory fees Client pays to Advisor (described in Section 4, below); Client's investment advisory fees to Advisor will not increase if Advisor elects to implement all or a portion of Client's Account(s) through IPW. Advisor is available to answer any questions Client has regarding IPW.

#### *AE Wealth Management*

Through our relationship with IPW, we have access to investment advisory services through AE Wealth Management, LLC ("AEWM"). This arrangement allows us to access model portfolios, model manager, strategists, third party money manager, and trading services. As part of the AEWM program, clients give Abich Financial Wealth Management discretion to select third party, non-affiliated investment managers to design and manage model portfolios for client assets. If Advisor determines that engaging AEWM is in a client's best interest, we will provide the client with AEWM's relevant disclosure documents including Form ADV2a, privacy policy and any other document necessary to provide a complete description of services and fees.

#### **Wrap Fee Program**

A wrap fee program is a comprehensive advisory account with a single fee that covers both asset management fees and trade ticket execution charges as well as the possibility of financial planning at no additional cost.

- Abich Financial Wealth Management does not sponsor or act as the portfolio manager of a wrap fee program.
- When using the platform and advisory services provided AEWM, clients will be participating in a wrap fee program.

#### **Educational Seminars / Workshops**

Abich Financial Wealth Management hosts complimentary educational workshops on retirement every month at local restaurants and colleges. These workshops offer the opportunity to learn more about how we can help protect your financial future. Specific investment advice or recommendations are not provided at the firm's educational seminars/workshops.

#### **Retirement Plan Rollovers**

An employee generally has four (4) options for their retirement plan when they leave an employer:

1. Leave the money in his/her former employer's plan, if permitted;
2. Rollover the assets to his/her new employer's plan, if one is available and permitted;
3. Rollover to an Individual Retirement Account (IRA); or,
4. Cash out the account value, which has significant tax considerations.

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

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Abich Financial Wealth Management also provides educational services to retirement plan participants with assets that could potentially be rolled over to an IRA advisory account.

### **C. Client Account Management**

Prior to engaging Abich Financial Wealth Management, each Client is required to enter into an investment advisory agreement that defines the terms, conditions, authority and responsibilities of the Advisor and the Client.

### **D. Assets Under Management**

Abich Financial Wealth Management, LLC has the following assets under management as of December 31, 2023:

<b>Assets Under Management</b>	<b>Assets</b>
Discretionary Assets	\$150,120,693
Non-Discretionary Assets	\$0.00
<b>Total</b>	<b>\$150,120,693</b>

Clients may request more current information at any time by contacting the Advisor.

### **E. Financial Planning**

Advisor, through its Investment Advisor Representatives, can provide financial planning as a complimentary service to clients engaged with the firm for Asset Management services. Advisor also offers standalone financial planning services on a separate fee schedule for clients not engaged with the firm for Asset Management services. See Item 5 for more information. The type of planning can vary greatly depending on the scope and complexity of an individual's financial situation. Examples of the type of planning available include the following:

#### **Cash Flow/ Budget Planning**

Planning to manage expenses against current and projected income.

#### **College / Education**

Planning to pay the future college / education expenses of a child or grandchild.

#### **Estate Planning**

Planning that focuses on the most efficient and tax friendly option to pass on an estate to a spouse, other family members or a charity.

**Final Expenses**

Planning to leave assets to cover final expenses such as funeral, debts and potential business continuity.

**Insurance Needs**

Planning for the financial needs of survivors to satisfy such financial obligations as housing, dependent childcare and spousal arrangements as well as education.

**Investment Planning**

Planning an investment strategy consistent with some particular objectives, time horizons and risk tolerances.

**Major Purchase**

Evaluation of the pros and cons of home ownership verse renting as well as buying or leasing a car, for example.

**Retirement**

Planning an investment strategy with the objective of providing inflation- adjusted income for life.

**F. Pontera**

Abich Financial Wealth Management uses a third-party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows Abich Financial Wealth Management to avoid being considered to have custody of client funds since Abich Financial Wealth Management does not have direct access to client log-in credentials to affect trades. Abich Financial Wealth Management is not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, Abich Financial Wealth Management will review the current account allocations. When deemed necessary, Abich Financial Wealth Management will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly, and allocation changes will be made as deemed necessary.

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**Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

**A. Fees for Advisory Services**

Fees are paid monthly in arrears. Fees are calculated based on the average daily balance at the end of each billing period.

- Additional funds added to accounts will be billed on a prorated basis.
- Fees on managed accounts are deducted from assets unless directed otherwise by you.
- Fees are generally not negotiable.
- Investment advisory fees are deducted by the custodian from Client accounts.

- Each time a fee is deducted the firm will concurrently send the qualified custodian and Client an invoice itemizing the fee that includes the formula used to calculate the fee, the amount of assets under managements the fee is based on, and the time period covered by the fee.
- Client will also receive monthly statements from the Custodian that provides details of the advisory fees.

Investment advisory fees do not exceed 1.5% of assets under management unless the scope, complexity or time required warrant a higher or lower fee.

- The investment advisory fee in the first period of service is pro-rated from the inception date of the account[s] to the end of the first month.
- The firm will not have the authority or responsibility to value portfolio securities.
- If a client terminates an engagement before the billing period ends, a pro-rated fee calculation will be applied before releasing the funds.

### **Fees for Portfolio Management via Selection of Other Advisors**

We are paid by third party money managers when we refer you to them and you decide to open a managed account, which creates a conflict of interest. The Firm will split its fee with the third-party money managers for managing your account. All fees paid to third party money managers and the written separate disclosures made to you regarding these fees comply with applicable state statutes and rules. The Firm will provide you with a copy of the third-party manager's Form ADV Part 2A, Form ADV Part 2B, Form CRS (if applicable) and a copy of the third party money manager's privacy policy. The third-party money managers we recommend will not directly charge you a higher fee than they would have charged without us introducing you to them.

#### **AEWM**

Services provided through AEWM's managed account program are offered through a wrap fee program. You will only pay fees based on assets under management and you will not pay a separate commission, ticket charge, or custodian fee for the execution of transactions in your account. The Firm's fees include the fees associated with allocating client assets to AEWM and client will not incur any additional fees for Abich Financial Wealth Management's use of AEWM.

### **B. Mutual Fund Share Class Disclosures**

Certain mutual fund share classes charge a 12b-1 fee that generally amounts to an additional .25% expense ratio or more. The purpose of 12b-1 fees, as approved by the SEC, are to cover marketing expenses and shareholder services such as support services and "other expenses" such as legal, accounting and the administrative functions of the custodian. When selecting a mutual fund, Investment Advisor Representatives have a fiduciary duty to choose the share class that helps manage the overall fee structure of the account. The entire fee structure includes such fees as the asset management fee, the expense ratio and ticket charges.

- Mutual funds typically offer multiple share classes, including lower-cost share classes that do not charge 12b-1 fees and are therefore usually less expensive.
- Investment Advisor Representatives will consider investing client funds in 12b-1 fee-paying share classes even when a lower-cost share class is available as appropriate to account for the overall fee structure and tax



considerations as well as attributes of a fund not available for lesser fees.

### **C. Financial Planning Fees**

Financial planning is a complimentary service offered to clients that are engaged with asset management services provided by Abich Financial Wealth Management.

The firm also offers standalone financial planning services for those not engaged with the firm for asset management. For standalone financial planning services, the firm charges on an hourly or flat fee basis. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of the firm's engagement with the client. The maximum hourly fee to be charged will not exceed \$350. Flat fees range from \$1,000 to \$20,000. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed services agreement. Our firm will not require a retainer exceeding \$1,200 when services cannot be rendered within 6 months.

An account can be terminated with written notice at least 30 calendar days in advance.

### **D. Compensation for Sales of Securities**

Abich Financial Wealth Management does not buy or sell securities. The firm does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above. Additional information about Brokerage Services is provided in Item 12.

### **E. Pontera Fees**

When advising individuals on employee benefit plans pursuant to ERISA, Abich Financial Wealth Management will utilize a platform called Pontera. Pontera will directly charge Abich Financial Wealth Management % AUM quarterly in advance. Abich Financial Wealth Management will pay this charge out of the Client's pre-existing advisory fee. For example, If Client's negotiated advisory fee is 0.75% annually, Client will be charged 0.75% AUM by Abich Financial Wealth Management, and Abich Financial Wealth Management will submit .30% AUM to Pontera, retaining 0.45% for Abich Financial Wealth Management.

The asset-based advisory fee payable for any qualified account (as defined below in Item 15, Custody) will be deducted directly from one of your other custodian/broker-dealer accounts. If there are insufficient funds available in another account or if Abich Financial Wealth Management believes that deducting the fee from another account would be prohibited by applicable law, Abich Financial Wealth Management will invoice you. Invoices must be paid within thirty (30) days of receipt and will bear interest after it becomes due and payable and shall continue to accrue interest until payment is made at a rate equal to the lesser of either (a) two percent (2%) above the prime rate as reported by Federal Reserve Bank of New York, located in New York, New York, as of the date such payment was due and payable, or (b) the maximum rate permitted by applicable law. In the event you terminate Abich Financial Wealth Management's advisory agreement, all prepaid advisory fees will be returned to you on a pro rata basis determined by the number of days remaining in the quarter of termination.

### **F. Other Fees and Expenses**

Clients will pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses).

If a client's assets are invested in mutual funds or other pooled investment products, Clients should be aware that there will

be two layers of advisory fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Client will also pay Advisor the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, clients could generally avoid the second layer of fees by not using the management services of Advisor and by making their own investment decisions.

Clients can incur fees or charges imposed by third parties, other than the firm, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the executing broker/dealer.

- The fees charged by the firm are separate and distinct from custodial and execution fees.
- All fees paid to the firm are separate and distinct from the expenses charged by mutual funds and exchange-traded funds. These fees and costs are described in each fund's prospectus.
- See Item 12 for additional information regarding brokerage practices.
- Further information regarding fees assessed by a mutual fund is available in the appropriate prospectus.

A Client could invest directly, without the services of Abich Financial Wealth Management, but would not receive the advisory services to assist in determining which products or features are most appropriate for their financial situation and objectives. Accordingly, the Client should review the fees charged by the fund[s] and the fees charged by the firm to fully understand the total costs.

#### **G. Educational Seminars / Workshops**

There are no fees for educational seminars /workshops.

#### **H. Termination**

##### **Investment Management Services**

A contract between Abich Financial Wealth Management and a Client may be cancelled at any time with thirty days prior written notice. Clients will be given this brochure form ADV Part 2A, forty-eight hours in advance of signing an agreement or they will have five business days to unconditionally cancel the agreement.

Abich Financial Wealth Management will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

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

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Neither the firm or any supervised persons accepts performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a client such as a hedge fund or other pooled investment vehicle.

The firm does not participate in side-by-side management.

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#### **Item 7 – Types of Clients**

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Abich Financial Wealth Management offers services to individuals and high net worth individuals.

The number of each type of Client is provided on Form ADV Part 1A. These numbers change over time and are updated at least annually.

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

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### **A. Methods of Analysis**

The firm uses a combination of multiple forms of analysis in order to formulate investment advice when managing assets. Depending on the analysis the firm will implement a long or short-term trading strategy based on the particular objectives and risk tolerance of a particular client.

- **Fundamental Analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.
- **Technical Analysis** involves the analysis of past market data; primarily price and volume. Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.
- **Cyclical Analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.
- **Charting Analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities fluctuate in value. Clients should be prepared to bear the risk of loss. Abich Financial Wealth Management will assist Clients in determining an appropriate strategy based on their tolerance for risk; however, there is no guarantee that a Client will meet their investment goals.

- **Act of God** – a natural and unavoidable catastrophe that interrupts the expected course of events, market structure and access to funds.
- **Business Risk** – the measure of risk associated with a particular security. It is also known as unsystematic

risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.

- **Call Risk** – the risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.
- **Company Specific Risk** – an non-systemic risk specific to a certain company's operations, executive decisions and reputation which is difficult to quantify
- **Concentration Risk** – concentrated portfolios are an aggressive and highly volatile approach to trading and investing and should be viewed as complementary to a stable, highly predictable investment approach. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding in the portfolio is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.
- **Credit Risk** – the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Currency/Exchange Rate Risk** – the risk of a change in the price of one currency against another.
- **Interest Rate Risk** – the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Inflationary Risk** – the risk that future inflation will cause the purchasing power of cash flow from an investment to decline.
- **Legislative Risk** – the risk of a legislative ruling resulting in adverse consequences.
- **Liquidity Risk** – the possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Market Risk** – the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries. This is a risk that will affect all securities in the same manner caused by some factor that cannot be controlled by diversification
- **Reinvestment Risk** – the risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.

- **Social/Political Risk** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Taxability Risk** – the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Terrorism Risk** – an act of terror or calculated use of violence against the country, market structure or individuals.

There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results.

### **C. Types of Investments (Examples, not limitations)**

- **Annuities** – are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy.
- **Blockchain ETFs** – are model portfolios designed to provide investors with indirect exposure to the cryptocurrency space using publicly traded companies and ETFs. The goal for the model portfolio is to benefit from the assets class, without the need to directly purchase the actual cryptocurrency itself. Narrowly focused investments typically exhibit higher volatility. A model portfolio concentrated in a single industry, such as companies actively engaged in blockchain technology may never develop or be able to transact processes that lead to returns for any company in which the model invests. Such investments may be subject to the following risks: Lack of liquid markets, possible manipulation of blockchain-based assets; lack of regulation; third party product defects or vulnerabilities; reliance on the internet, and line of business risk.
- **Cash Positions** – Based on perceived or anticipated market conditions and/or events, certain assets may be taken out of the market and held in a defensive cash position. All cash may be included as assets subject to the agreed upon advisory fee. Other investment types may be included as appropriate for a particular client and their respective trading objectives. Abich Financial Wealth Management will generally invest clients' cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve a reasonable return on our client's cash balances through relatively low-risk conservative investments.
- **Equity** – investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.

- **Exchange Traded Funds (ETFs)** – An ETF is a portfolio of securities invested to track a market index like an index mutual fund, but the shares are traded on an exchange like an equity. An ETF share price fluctuates intraday depending on market conditions instead of having a net asset value (NAV) that is calculated once at the end of the day. The shares may trade at a premium or discount; and as a result, investors pay when purchasing shares and receive more or less than when selling shares. The supply of ETF shares is regulated through a mechanism known as creation and redemption that involves large specialized investors, known as authorized participants (APs). Authorized participants are large financial institutions with a high degree of buying power, such as market makers, banks or investment companies that provide market liquidity. When demand increases, more ETF shares can be created and when demand decreases, the ETF can be disassembled back into single securities. Multiple authorized participants help improve the liquidity of an ETF and stabilize the share price. To the extent that authorized participants cannot or are otherwise unwilling to engage in creation and redemption transactions, shares of an ETF tend to trade at a significant discount or premium and may face trading halts and delisting from the exchange. The performance of ETFs is subject to market risk, including the complete loss of principal. ETFs also have a trading risk based on cost inefficiency if the ETFs are actively traded and a liquidity risk if the ETFs has a significant price spread and low trading volume. In addition, investors buying or selling shares in the secondary market pay brokerage commissions, which is a cost not incurred by mutual funds. Like mutual funds, shares of an ETF represent partial ownership of an underlying portfolio of securities.
- **Exchange-Traded Notes (ETNs)** – An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day.
- **Fixed Income** – investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Mutual Funds** – a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
  - **Open-End Mutual Funds** – a type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.
  - **Closed-End Mutual Funds** – a type of mutual fund that raises a fixed amount of capital through an

initial public offering (IPO). The fund is then structured, listed and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. To provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.

- **Alternative Strategy Mutual Funds** – Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund’s concentration in the real estate industry.
- **Structured Products** – Structured products are designed to facilitate highly customized risk-return objectives. While structured products come in many different forms, they typically consist of a debt security that is structured to make interest and principal payments based upon various assets, rates, or formulas. Many structured products include an embedded derivative component. Structured products may be structured in the form of a security, in which case these products may receive benefits provided under federal securities law, or they may be cast as derivatives, in which case they are offered in the over-the-counter market and are subject to no regulation. Investing in structured products includes significant risks, including valuation, lack of liquidity, price, credit, and market risks. The relative lack of liquidity is due to the highly customized nature of the investment. Moreover, the full extent of returns from the complex performance features is often not realized until maturity. As such, structured products tend to be more of a buy-and-hold investment decision rather than a means of getting in and out of a position with speed and efficiency. Another risk with structured products is the credit quality of the issuer. Although the cash flows are derived from other sources, the products themselves are legally considered to be the issuing financial institution’s liabilities. The vast majority of structured products are from high-investment-grade issuers only. Also, there is a lack of pricing transparency. There is no uniform standard for pricing, making it harder to compare the net-of-pricing attractiveness of alternative structured product offerings than it is, for instance, to compare the net expense ratios of different mutual funds or commissions among broker-dealers.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

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## Item 9 – Disciplinary Information

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Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an advisory firm or the integrity of a firm’s management. Any such disciplinary information for the company and the company’s investment advisor representatives would be provided herein and publicly accessible by selecting the Investment Advisor Search option at <http://www.adviserinfo.sec.gov>. There are no legal or disciplinary events to disclose.

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## Item 10 – Other Financial Industry Activities and Affiliations

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### **Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither Abich Financial Wealth Management nor its representatives are registered as or have pending applications to become a broker/dealer or registered representatives of a broker/dealer.

### **Futures and Commodities**

Neither Abich Financial Wealth Management nor any of the management persons are registered or has a registration pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

### **Insurance**

Investment Advisor Representatives of Abich Financial Wealth Management are also insurance agents of Abich Financial Services, Inc., an affiliated insurance company, appointed with multiple carriers to sell insurance products. Abich Financial Services and Abich Financial Wealth Management are under common control. Mr. Abich (CRD #5015292) is the owner of Abich Financial Services. There are no referral arrangements between Abich Financial Services and Abich Financial Wealth Management. Insurance products are sold for commission compensation, which is a conflict of interest. This conflict of interest is mitigated by a fiduciary duty to act in a client's best interest.

Clients are not obligated to purchase recommended insurance products through the carriers or business entity recommended by the firm's investment advisor representatives ("IARs").

### **Other Investment Advisors**

Abich Financial Wealth Management does not recommend or select other investment advisors.

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

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

Abich Financial Wealth Management maintains a Code of Ethics establishing a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty and trust.

The Code of Ethics includes guidelines regarding personal securities transactions of its employees and investment advisor representatives.

An investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. Abich Financial Wealth Management, LLC requires all of our supervised persons to conduct business with the highest level of ethical

standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request. To request a copy of our Code, please contact us at (571) 577-9968 or via email at [angela@abichfinancial.com](mailto:angela@abichfinancial.com).



## **B. Personal Trading with Material Interest**

Abich Financial Wealth Management does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. Abich Financial Wealth Management does not have a material interest in any securities traded in Client accounts.

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

Abich Financial Wealth Management allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to a Client represents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Abich Financial Wealth Management requiring reporting of personal securities trades by its access Persons for review by Angela Mari, the Chief Compliance Officer (“CCO”) by conducting a coordinated review of personal accounts and the accounts of the Clients. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

- This presents a conflict of interest because trading by an employee or Investment Advisor Representatives in a personal securities account in the same or different security on or about the same time as trading by a client could potentially disadvantage the client.
- Abich Financial Wealth Management addresses this conflict of interest by requiring in its Code of Ethics that employees and investment advisor representatives report certain personal securities transactions and holdings to Angela Mari, the Chief Compliance Officer for review.

## **D. Personal Trading at Same Time as Client**

While Abich Financial Wealth Management allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will Abich Financial Wealth Management, or any Supervised Person of Abich Financial Wealth Management, transact in any security to the detriment of any Client.

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## **Item 12 – Brokerage Practices**

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Abich Financial Wealth Management will suggest brokers or dealers to be used based on execution and custodial services offered, cost, quality of service and industry reputation. More specifically, Abich Financial Wealth Management will consider factors such as commission price, speed and quality of execution, client management tools, and convenience of access for both the Advisor and client in making its suggestion.

### **Selection of Broker-Dealer**

Abich Financial Wealth Management recommends their clients use Charles Schwab & Co. Inc. (“Charles Schwab” or “Schwab”), member FINRA/SIPC. Schwab is an independent [and unaffiliated] SEC-registered broker-dealer. Schwab provides to independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisors receive some benefits from Schwab for participation in the program.

Clients are under no obligation to purchase or sell securities through institutional investment custodians or any other recommended custodian or broker/dealer. Concentrating business with one custodian can benefit all clients by lowering some mutual fund transaction fees. We prefer to recommend custodians for this reason and because our back-office operations are more complex if we use multiple custodians. Clients are unable to choose a qualified custodian other than those recommended by Abich Financial Wealth Management. Not all Registered Investment Advisors require clients to execute through a specific broker/dealer.

### **Schwab, Inc.**

There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to Schwab retail investors.

- These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations;
- research related products and tools; consulting services;
- access to a trading desk serving Advisor participants;
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts);
- the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information;
- access to mutual funds with no transaction fees and to certain institutional money managers; and,
- discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third-party vendors.

Schwab may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by the Schwab program may benefit Advisor but may not benefit its client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at Charles Schwab. Other services Schwab offers are intended to help Advisors further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Schwab. As part of its fiduciary duties Abich endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Charles Schwab for custody and brokerage services.

### **Best Execution**

The commissions and transaction fees paid by Clients comply with the firm's duty to obtain best execution; however, clients may pay a commission that is higher than what another broker-dealer charges based on the total value of services received. Price is not the only factor to consider for best execution. Instead, best execution takes into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although the firm seeks competitive rates, we may not necessarily obtain the lowest possible commission rates.

### **Aggregation & Allocation of Transactions**

Although each client's portfolio accounts are individually managed, Abich Financial Wealth Management will aggregate

client orders when there is an opportunity to do so to allow all clients to receive the same execution price.

If the aggregated purchase or sale involves several executions to complete the transaction, clients will receive the average price paid or received on the aggregated transaction. However, if an aggregated transaction results in only a partial execution and the equal allocation of the partial execution amongst multiple clients would result in an inefficient trading unit in client portfolios. The firm reserves the right to allocate the transaction to specific individual clients on an equitable rotational basis so that over time, no client is disadvantaged in the management of its portfolio.

### **Directed Brokerage**

The firm does not accept directed brokerage arrangements (when a client requires that account transactions be executed through a specific broker/dealer). By directing brokerage, the firm may be unable to achieve most favorable execution of client transactions, and that this practice may cost clients more money.

### **Soft Dollars**

As part of our fiduciary duties to you, we always endeavor to put your interests first. You should be aware that the receipt of economic benefits by our Firm is considered to create a conflict of interest. In recommending a broker-dealer, we will consider the value of research and additional brokerage products and services that broker-dealer has provided or will provide to our clients and our Firm. Receipt of these additional brokerage products and services are considered to have been paid for with “soft dollars.” Because such services could be considered to provide a benefit to our Firm, we have a conflict of interest.

We could receive benefits by selecting a particular broker-dealer to execute your transactions, and the transaction compensation charged by that broker-dealer might not be the lowest compensation we might otherwise be able to negotiate. Products and services that we may receive from broker-dealers may consist of research data and analyses, financial publications, recommendations or other information about particular companies and industries (through research reports and otherwise), and other products or services (e.g., software and data bases) that provide lawful and appropriate assistance to our Firm in the performance of our investment related decision-making responsibilities. Consistent with applicable rules, brokerage products and services consist primarily of computer services and software that permit our Firm to effect securities transactions and perform functions incidental to transaction execution. We use such products and services in our general investment decision making, not just for those accounts for which commissions may be considered to have been used to pay for the products or services.

The test for determining whether a service, product, or benefit obtained from or at the expense of a broker constitutes “research” under this definition is whether the service, product, or benefit assists our Firm in investment decision-making for discretionary client accounts. Services, products, or benefits that do not assist in investment decision-making for discretionary client accounts do not qualify as “research.” Also, services, products, or benefits that are used in part for investment decision-making for discretionary client accounts and in part for other purposes (such as accounting, corporate administration, recordkeeping, performance attribution analysis, client reporting, or investment decision-making for the Firm’s own investment accounts) constitute “research” only to the extent that they are used in investment decision-making for discretionary client accounts.

Abich Financial Wealth Management receives support services without cost, at a discount, or a negotiated rate from Schwab. For example, such things as research reports or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making. The firm does not have to produce or pay for the research, products or services which creates an incentive to select or recommend a broker/dealer based on an interest in receiving the research and/or other products or services, rather than a clients’ interest in receiving most favorable execution.

Abich Financial also receives benefits through its relationship with Impact Partnership and Impact Partnership Wealth. Abich Financial has access to research, software, technology, reporting, ongoing product education, marketing support, advertising campaigns, workshop material, and website services.

### **Brokerage for Client Referrals**

Abich Financial Wealth Management does not receive client referrals from a broker/dealer or third party.

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## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Angela Mari Chief Compliance Officer of Abich Financial Wealth Management. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

The nature of the reviews includes an evaluation of account holdings against investment objectives, time horizons and risk profiles as well as financial plans for consistency.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Abich Financial Wealth Management if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

Angela Mari, the Chief Compliance Officer, will also conduct account reviews based on the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and by client request.

### **C. Review Reports**

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts.

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

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### **A. Compensation Received by Abich Financial Wealth Management**

Abich Financial Wealth Management is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. Abich Financial Wealth Management does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Abich Financial Wealth Management may refer Clients to various unaffiliated, non- advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Abich Financial Wealth Management may receive non-compensated referrals of new Clients from various third parties.

Investment Advisor Representatives ("IARs") of Abich Financial Wealth Management may qualify for certain sales incentives or other types of awards based on the value of assets under management or investment products and services

sold. For example, IARs may become eligible to receive additional compensation amounts, marketing dollars, reimbursement for approved business expenses, and attendance at various forms of entertainment or attendance at events and educational conferences hosted or subsidized by the sponsors of certain investment products or third-party asset manager programs.

Investment Advisor Representatives (“IARs”) of Abich Financial Wealth Management may also receive commissions from the sales of insurance products generated as an insurance agent.

### **B. Client Referrals from Solicitors**

Abich Financial Wealth Management has entered into an agreement with SmartAsset Advisors, LLC (“SmartAsset”), an investment adviser registered with the U.S. Securities & Exchange Commission, whereby SmartAsset will receive compensation from Abich Financial Wealth Management for both prospective clients it refers as well as for prospective clients it refers who enter into an advisory agreement with Abich Financial Wealth Management for investment advisory services. SmartAsset is not otherwise affiliated with Abich Financial Wealth Management.

SmartAsset will connect Abich Financial Wealth Management with potential client leads. SmartAsset will be paid for each matched lead based on the investable assets reported by Abich Financial Wealth Management of each matched lead pursuant to the following schedule:

#### Standard Leads:

>\$1,000,000	\$251 per lead
\$250,001-\$1,000,000	\$124 per lead
\$100,001-\$250,000	\$50 per lead
\$25,000-\$100,000	\$29 per lead

#### Live Connection Leads

>\$1,000,000	\$709 per lead
\$250,001-\$1,000,000	\$345 per lead
\$100,001-\$250,000	\$153 per lead
\$25,000-\$100,000	\$130 per lead

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### **Item 15 – Custody**

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Abich Financial Wealth Management does not have direct custody of client funds or securities. However, as a consequence of the authority to make withdrawals from client accounts to pay advisory fees the firm has indirect or constructive custody. The firm provides the following safeguards:

1. The firm obtains written authorization from the client to deduct advisory fees from the account held with the qualified custodian.
2. Each time a fee is directly deducted from a client account, the firm will concurrently send the qualified custodian an invoice of the amount of the fee to be deducted from the client’s account and send the client an invoice itemizing the fee. Itemization includes the formula used to calculate the fee, the amount of

assets under management the fee is based on, and the time period covered by the fee.

Abich Financial Wealth Management does not provide custodial services to its clients. Client assets are held with banks, financial institutions or registered broker-dealers that are "qualified custodians". Clients will receive statements directly from the qualified custodians at least quarterly. Clients are urged to carefully review those statements. Clients do not receive account statements from Abich Financial Wealth Management.

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### **Item 16 – Investment Discretion**

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The client can determine to engage Abich Financial Wealth Management to provide investment advisory services only on a discretionary basis. Full discretion includes the authority to determine the securities to be bought or sold as well as the amount. Prior to Abich Financial Wealth Management assuming discretionary authority over a client's account, the client shall be required to execute a written agreement, granting Abich Financial Wealth Management full authority to buy, sell, or otherwise effect transactions.

When discretionary authority is granted, the firm will have the ability to determine the securities to be bought or sold, the amount of securities to be bought or sold, and the broker/dealer to be used for a purchase or sale of securities for a client's account without consulting the client first. Clients may place reasonable trading limitations as indicated on the asset management agreement.

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### **Item 17 – Voting Client Securities**

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Abich Financial Wealth Management does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for voting. Clients may contact the firm at (571) 577-9968 with any questions about proxies.

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### **Item 18 – Financial Information**

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Abich Financial Wealth Management does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients.

Abich Financial Wealth Management has not been subject to a bankruptcy petition at any time.

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### **Privacy Policy**

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#### **Our Commitment to You**

Abich Financial Wealth Management, LLC ("the firm") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described herein our Privacy Policy ("Policy"). Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. The firm (also referred to as "we", "our" and "us") protects the security and confidentiality of personal information. Additionally, the firm has implemented controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Abich Financial Wealth Management, LLC does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection

with the servicing and management of our relationship with you, as discussed below. Details of our approach to privacy and how your personal non-public information is collected and used is outlined in this Policy.

**What you need to know?**

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

**What information do we collect from you?**

Driver’s license number	Date of birth
Social security or taxpayer-identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

**What Information do we collect from other sources?**

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment suitability questionnaires
Transactional information with us or others	Additional information needed to service account

**How do we protect your information?**

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect the Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

**How do we share your information?**

A Registered Investment Advisor shares Client personal information to implement its services effectively. In the section below, we list some reasons we may share your personal information.

<b>Basis For Sharing</b>	<b>Do we share?</b>	<b>Can you limit?</b>
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<p><b>Servicing our Clients.</b> We share information with technology vendors and third-party service providers to manage and support operations and regulatory compliance (such as administrators, brokers, custodians, regulators, credit agencies, consultants and other financial institutions) as necessary to provide agreed-upon services, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.</p>	<p>Yes</p>	<p>No</p>
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<p><b>Marketing Purposes.</b> The firm does not disclose and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Specific laws may give us the right to share your personal information with financial institutions where you are a customer and where Abich Financial Wealth Management, LLC or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing.</p>	<p>No</p>	<p>Not Shared</p>
<p><b>Authorized Users.</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).</p>	<p>Yes</p>	<p>Yes</p>
<p><b>Information About Former Clients.</b> The firm does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties concerning persons who are no longer our Clients.</p>	<p>No</p>	<p>Not Shared</p>

<p><b>Other Important Information</b></p>		
<p><b>Information for California, North Dakota, and Vermont Customers:</b> In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of their marketing to you, except as permitted by the applicable state law.</p>		
<p><b>Massachusetts:</b> In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.</p>		

**Changes to our Privacy Policy**

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy



Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

**Any Questions?**

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us by telephone at (571) 577-9968 or by email at [angela@abichfinancial.com](mailto:angela@abichfinancial.com).