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August 30, 2025

FORM ADV PART 2A

BROCHURE

This brochure provides information about the qualifications and business practices of Meira Wealth. If you have any questions about the contents of this brochure, please contact us at 305-670-4440. 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 Meira Wealth is available on the SEC's website at [www.adviserinfosec.gov](http://www.adviserinfosec.gov).

Meira Wealth is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## Item 2 | Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment filing, dated March 22, 2024, we have updated our brochure to remove reference to National Advisors Trust Co. as Linda Lubitz Boone, CFP® is no longer a shareholder of National Advisors Trust Co. We have also added additional language describing the alternative investments we may recommend and the risks associated with those investments. Reference to Parametric has also been removed as none of our client accounts are currently managed by Parametric.

Additionally, our brochure was updated on August 30, 2025 to reflect a change in Meira Wealth's ownership. The firm was previously owned by both Linda Lubitz Boone and Jorge Padilla and is currently owned solely by Mr. Padilla through Ikigai Wealth PA.

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## Item 4 | Advisory Services

### Description of Services and Fees

The firm was founded in 1997 as Linda S. Lubitz, CFP®, PA (the legal entity name) dba (doing business as) Meira Wealth. We are a privately held independent Registered Investment Advisor firm with our office in Coral Gables, Florida. Ikigai Wealth PA, an entity 100% owned by Jorge Padilla, President and CEO of Meira Wealth, owns 100% of Meira Wealth's stock.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our" and "us" refer to Meira Wealth and the words "you", "your", "they" and "client" refer to you as either a client or prospective client of our firm.

We provide personalized, confidential financial planning and investment management services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and small businesses. Advice is provided through consultation with the client and may include the determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding planning, retirement planning, charitable planning and estate planning.

Our initial meeting, normally in person but may be by telephone (or virtually), is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management advice may be beneficial to you and appropriate for us.

### Financial Planning Services

Our financial plans are designed to be broad-based in nature. Generally, in keeping with the scope of the planning engagement, we provide you with a written plan, which reviews your current situation and recommends actions consistent with your financial and personal goals. A fee based on the adjusted Net Worth of the client is charged and included in the Client Advisory Agreement.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations. We may also provide hourly consulting on specific topics as requested.

General investment advice is provided as part of a financial plan. Implementation of the recommendations is at your discretion.

No legal or accounting, or property/casualty insurance advice is given. The financial planning written report is a service separate from specific securities recommendations and on-going

supervision of investments. Unless otherwise agreed to in the Client Advisory Agreement, there will be no ongoing investment management after the financial plan is completed. You may use our services for the written report and/or ongoing fee-only investment management.

Our Financial Planning services end at the termination of the Client Advisory Agreement financial planning contractual period. Should a financial planning-only client wish to get periodic updates, they will be charged an appropriate fee for the services provided.

For our ongoing Investment Management clients, updates to their financial plan are provided either as part of their ongoing annual fee or for an additional fee if appropriate.

Our clients acknowledge that:

- Any financial planning is based solely on the accuracy and completeness of the information provided by them.
- Any projections or other information generated during the financial planning process
- Are hypothetical in nature,
- Do not reflect actual investment results, and
- Do not guarantee any future results.

Our client must promptly notify our firm if their financial situation, goals, objectives, or needs change. They are under no obligation to act on our financial planning recommendations. Should they choose to act on any of our recommendations, they are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, they may act on our recommendations by placing securities transactions with any brokerage firm.

### Investment Management Services

Most Financial Planning clients choose to have our firm manage their investments in order to obtain ongoing in-depth financial advice. The Client Advisory Agreement section pertaining to Investment Management Services will be executed when we are retained for ongoing investment management. Investment advice is provided and based upon the mutually signed Investment Policy Statement. We select investments based upon your Investment Policy Statement.

The scope of work and fee for the Client Advisory Agreement is provided to you in writing prior to the start of the relationship. The Investment Management Services relationship includes periodic reporting, usually quarterly, of your investment values, investment policy target allocation vs. actual, asset class diversification, individual security selection, best efforts at rebalancing to the target Investment Policy Statement allocation ranges, tax-loss harvesting, tax reporting and periodic meetings with you to review these and other items.

If you participate in our discretionary Investment Management Services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is

granted by the Client Advisory Agreement you sign with our firm and the appropriate custodial and/or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. We will use our best efforts to honor your requests but cannot guarantee we will be able to.

### Courtesy Accounts

As an accommodation for clients and others, from time to time, Meira Wealth may allow clients to establish an account ("Courtesy Account") under a separate Meira Wealth's Master Account at Schwab. Before Meira Wealth agrees to such an account, the account holder must sign a written Courtesy Account Agreement which sets forth the terms and conditions under which the Courtesy Account must operate.

These conditions include but are not limited to the following:

- i. Meira Wealth will not have any fiduciary or other responsibility with respect to assets held in any such Courtesy Account.
- ii. Meira Wealth has no responsibility to monitor, trade, or report on assets held in the Courtesy Account; and
- iii. Assets held in the Courtesy Account will not be included in Meira Wealth's Investment Advisory fee calculations.

### Types of Investments

Assets are invested primarily in no-load mutual funds and exchange-traded funds, usually through custodians or fund companies. Investments may also include equities (stocks), corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (no-load variable annuities, and mutual funds shares), U.S. government securities, options contracts, futures contracts, business development companies (BDCs) and interests in partnerships. Initial public offerings (IPOs) are typically not available through our firm.

We may recommend and invest in non-liquid and non-publicly traded companies such as private debt or equity firms, mutual funds with limited liquidity (commonly called Interval Funds), and real estate investments with limited liquidity. Due diligence will be performed by our advisory team with the assistance of an outside consultant before such recommendations are made. These investment recommendations may not be suited for every client and will only be suggested to clients who meet a specific financial and risk profile, and if required by the investment company, to clients who qualify as accredited investors and/or qualified purchasers. Under these circumstances, we will act as the advisor and we may use a custodian like Charles Schwab & Co., Inc., Fidelity Brokerage Services, LLC, or a similar company to custody the investment and comply with the required financial reporting and disclosures.

You may request that we refrain from investing in a particular security or certain types of securities. These restrictions will be documented in our mutually signed Investment Policy Statement. We will use our best efforts to honor your requests but cannot guarantee we will be

able to do so.

Certain aspects of our investment operations are performed by Advisor Logistics LLC. The administration of, and access to, their wealth management platform as well as advisor portal is utilized by Meira Wealth for a fee, without an impact to clients. Assistance in trading and rebalancing Meira Wealth designed models is carried out by Advisor Logistics LLC per Meira Wealth specifications. Additionally, we utilize MTO Financial Services to assist with client fee calculations and client fee debiting administration. Client personal information is accessible by Advisor Logistics and MTO Financial Services in order to provide these services. As dictated by our agreement with each of these firms, "each party agrees to retain in confidence at all times and to require its employees, consultants, Platform Providers, Technology Providers, professional representatives and agents to retain in confidence all Confidential Information in connection with the Agreement."

#### General - Advisory Services to Retirement Plans and Plan Participants

We offer various levels of advisory and consulting services to employee benefit plans ("Plan") and to the Trustee(s) of such plans ("Trustees"). The services are designed to assist plan sponsors in meeting their management and fiduciary obligations to Participants under the Employee Retirement Income Securities Act ("ERISA"). Pursuant to adopted regulations of the U.S. Department of Labor, we are required to provide the Plan's responsible plan fiduciary (the person who has the authority to engage us as an investment adviser to the Plan) with a written statement of the services we provide to the Plan, the compensation we receive for providing those services, and our status (which is described below).

The services we provide to your Plan are described above under the Investment Management Services heading, and in our Client Advisory Agreement. Our compensation for these services is described below, at Item 5, and in the Client Advisory Agreement. We do not reasonably expect to receive any other compensation, direct or indirect, for the services we provide to the Plan or Trustee, unless the plan sponsor directs us to deduct our fee from the plan or directs the plan record-keeper to issue payment for our fee out of the plan. If we receive any other compensation for such services, we will (i) offset the compensation against our stated fees, and (ii) we will promptly disclose the amount of such compensation, the services rendered for such compensation and the payer of such compensation to you.

#### Status

In providing services to the Plan and Trustee, our status is that of an investment adviser registered under the Investment Advisers Act of 1940, and we are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting either as a non-discretionary fiduciary of the Plan as defined in Section 3(21) under ERISA, or as a discretionary fiduciary of the plan as defined in Section 3(38) under ERISA.

#### Assets Under Management

As of 12/31/2024, we manage \$279,561,070 in client assets on a discretionary basis.

## Item 5 | Fees and Compensation

We are strictly a fee-only financial planning and investment management firm. We do not sell any investment products, such as annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products that pay our firm any compensation. No commissions in any form are accepted. No finder's fees or referral fees are accepted. We receive compensation only from our clients.

### Financial Planning Services

Typically, the fees we charge for Financial Planning are separate from our Investment Management Services. The Financial Planning fee is based upon a percentage of an adjusted Net Worth for billing purposes as articulated in the table below. Fifty percent (50%) of the planning fee is due to commence the relationship with the remaining balance due upon the completion and delivery of the plan. Our minimum financial planning fee is \$2,000.

Net Worth	Financial Planning Fee
First \$2,000,000	.20% of Net Worth (\$2,000 minimum fee)
Next \$3,000,000	.10% of Net Worth
Next \$5,000,000	.05% of Net Worth
Amounts of \$10,000,000	.03% of Net Worth

### Methodology to Calculate Net Worth (for Financial Plan Fee Billing Purposes)

#### What's Included

- Cash and deposits
- Investments (non-retirement accounts)
- Retirement accounts
- Annuities (or the cash surrender value)
- NET value of investment real estate (using publicly available sources such as Zillow, Trulia, or tax assessed value)
- 529 plans/UTMA Accounts
- HSA (Health Savings Accounts) accounts (value of investment holdings)
- Stock compensation - vested value
- Private notes / loans
- All other liabilities or loans (outside of real estate mortgages)
- Life insurance cash surrender value

#### What's Not Included

- Primary residence
- Pension benefit
- Private or family business
- Immediate annuity



## Terminating Planning Engagements

A client may terminate the Client Advisory Agreement at any time by providing written notice to our firm. The client will incur a pro-rata charge for services rendered prior to the termination of the agreement. If there are pre-paid advisory fees that we have not yet earned, the client will receive a prorated refund of those fees.

For clients solely electing to receive a one-time financial plan, upon the completion of the financial plan, the delivery of the Financial Planning Services by Meira Wealth is considered complete and the Client Advisory Agreement is terminated. Unless extended in writing, the Agreement for Financial Planning Services will terminate no later than 18 months after signing.

## Investment Management Services

Our fee for Investment Management Services is based on a percentage of your assets we manage according to the following fee schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
First \$2,000,000	@ 1.0% (\$5,000 minimum Annual Fee)
Next \$3,000,000	@ 0.7%
Next \$5,000,000	@ 0.4%
Amounts above \$10,000,000	@ 0.25%

The Investment Management fee can be influenced by several factors including the composition of the account, the nature of the account, the existence of related accounts, the source of the account, the complexity of the account and when the account was established, and as a result, may change. Current client relationships may exist where the fees are higher or lower than the fee schedule above. Occasionally, various related client accounts may be grouped together to qualify for reduced advisory fees. This is typically referred to as "household aggregate" billing.

Generally, our annual Investment Management fee is billed and payable quarterly in advance based on the gross value of a client account on the last business day of the previous quarter. We reserve the right to bill an additional fee if more than \$50,000 in assets are added to the accounts during a quarter or adjust the fee if at least \$50,000 in assets are withdrawn during a quarter. When a new account is implemented during a quarter, Meira Wealth will prorate the fee and bill in arrears on such new account at the time of the initial quarterly billing. Although the Client Advisory Agreement is an ongoing agreement and constant adjustments are required, the length of service is at the client's discretion. A client may terminate the Client Advisory Agreement at any time by notifying our firm in writing. We may terminate the Client Advisory Agreement at any time by notifying a client in writing. The Client shall be responsible for Investment Management Fees up to and including the effective date of termination. Meira Wealth will refund any unearned, prepaid fees based on the number of days remaining in the quarter from the day following the effective date of termination to the end of the quarter. For

every resigned account, we confirm the action to a client via a letter. These fees are either reimbursed directly into the client account or by a company check made payable to the account holder.

We will deduct our fee directly from the client account through the qualified custodian holding your funds and securities. It may be possible to pay our fees directly by check, however, there may be an administrative fee assessed for this method of payment. We will deduct our advisory fee only when written authorization permitting the fees to be paid directly from an account has been given. Further, the qualified custodian will deliver an account statement to the client at least quarterly. These account statements will show all disbursements from the account. All statements should be reviewed for accuracy by the client. A calculation of this fee is available to the client, upon request.

### Past Due Accounts

We reserve the right to stop work on any account that is more than 60 days overdue. In addition, we reserve the right to terminate any financial planning engagement where a client has willfully concealed, has refused to provide pertinent information about financial situations when necessary and appropriate, or does not respond to our inquiries in a timely fashion, in our judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

### Additional Fees and Expenses

As part of our Investment Management Services, we may invest, or recommend investing in mutual funds and exchange traded funds. The fees that a client pays to our firm for Investment Management Services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. A client may also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom the account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost a client may incur, they should review all the fees charged by mutual funds, exchange-traded funds, our firm, and others. For information on our brokerage practices, please refer to the Brokerage Practices section of this brochure.

If it is determined that a client portfolio shall contain corporate debt or other types of over-the-counter securities, the client may pay a mark-up or mark-down or a "spread" to the broker or dealer on the other side of the transaction that is built into the purchase price of the security. Meira Wealth does not share in any such compensation.

As a general rule, we do not trade client accounts on margin; however, at the request of the client for a short-term cash needs situation or to cover checks written on the account when cash is not available, we will do so. Each client must sign a separate margin agreement with the custodian before margin is extended to that client account. As a convenience to our clients, we generally will open a margin account feature on their non-retirement account. Fees for advice and execution on these securities are based on the total asset value of the account, which

includes the value of the securities purchased on margin. While a negative amount may show on a client's statement for the margined security as the result of a lower net market value, the amount of the Investment Management fee is based on the absolute market value. This creates a conflict of interest where we have an incentive to encourage the use of margin to create a higher market value and therefore receive a higher fee. The use of margin may also result in interest charges in addition to all other fees and expenses associated with the security involved.

## Item 6 | Performance-based Fees and Side-by-Side Management

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our ongoing advice fees are calculated as described in the Investment Management section above and are not charged on the basis of a share of capital gains or capital appreciation of the funds in your advisory account because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk.

## Item 7 | Types of Clients

### Description

We generally provide investment advice to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, or business entities.

### Account/Fee Minimums

The minimum account size for Investment Management Services is \$500,000 of assets under management, which equates to an annual fee of \$5,000. When an account falls below \$500,000 in value, the minimum annual fee of \$5,000 is typically charged. We have the discretion to waive the account minimum. Accounts of less than \$500,000 may be set up when we, and the client, anticipate the client will add additional funds to the accounts bringing the total to \$500,000 within a reasonable time. Other exceptions may apply to employees of our firm and their relatives, or relatives of existing clients.

The minimum fee for Financial Planning services is \$2,000 and is negotiable based on the complexity associated with the client's situation.

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

### Our Methods of Analysis

Security analysis methods may include fundamental and/or technical analysis. In addition,

suitable categories of investments are selected in accordance with the clients' attitudes about risk and their need for capital appreciation or income production. Within each category, individual investments whose characteristics are most consistent with the particular objectives for which the category was chosen are selected. Risk factors of the different investments are considered, particularly in light of the clients' willingness to assume short-term volatility risk.

The main sources of information include financial publications, research materials provided by other investment institutions, corporate rating services, annual reports, prospectuses, and company press releases. We also have a contract with an outside consulting firm, Helios, to provide advice on portfolio construction and specific security selection.

Other sources of information that we may use include Y Charts information, our custodians' research platforms, Advisor Intelligence, and other internet sources.

### Investment Strategies

Our client's portfolios are managed using a combination of both active and passive management styles, based on the belief that while passive (index-based) investment management is well-diversified and effective in some parts of the markets, not all parts of all markets are well suited to the passive approach. In those areas we deem as less efficient, we may pick investments that have successful track records in these areas. Our clients need to understand that the results may range from above to below market results based on the skill of selection as well as the overall performance of the markets. Modern Portfolio Theory, as recognized by the 1990 Nobel Prize, will be the philosophical foundation for how the portfolio will be structured and how subsequent decisions will be made. The underlying concepts of Modern Portfolio Theory include:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by potential portfolio returns.
- Markets are efficient. It is virtually impossible to anticipate the future direction of the market as a whole or of any individual security. It is, therefore, unlikely that any portfolio will succeed in consistently "beating the market."
- The design of the portfolio as a whole is more important than the selection of any particular security within the portfolio. The appropriate allocation of capital among asset classes (stocks, bonds, cash, etc.) will have far more influence on long-term portfolio results than the selection of individual securities. Investing for the long term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- For a given risk level, an optimal combination of asset classes will maximize returns. Diversification helps reduce investment volatility. The proportional mix of asset classes determines the long-term risk and return characteristics of the portfolio as a whole. Portfolio risk can be decreased by increasing diversification of the portfolio and by lowering the correlation of market behavior among the asset classes selected. (Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.)
- Investing globally helps to minimize overall portfolio risk due to the imperfect correlation between economies of the world. Investing globally has also been shown historically to

enhance portfolio returns, although there is no guarantee that it will do so in the future.

- Stocks/Stock funds offer the potential for higher long-term investment returns than cash or fixed income/bond/CD investments. Stocks are also more volatile in their performance. Investors seeking higher rates of return must increase the proportion of stocks in their portfolio, while at the same time accepting greater variation of results (including occasional declines in value).
- Picking individual securities and timing the purchase or sale of investments in the attempt to "beat the market" are highly unlikely to increase long-term investment returns; they also can significantly increase portfolio operating costs. Such practices are, therefore, to be avoided.

Given these tenets, the underlying approach to managing client accounts shall be to optimize the risk-return relationship appropriate to their needs and goals. Client Investment Policies will be diversified globally employing a variety of asset classes. Mutual funds or managed portfolios will be employed to implement the portfolio and the chosen asset classes will be periodically re-balanced to maintain a more consistent risk/reward profile.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, and, in limited circumstances, margin transactions.

### Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is not a guaranteed indication of future performance.

Our investment approach routinely keeps the risk of loss in mind. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as

exchange rate risk.

- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, 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.

### Tax Considerations

As a result of revised IRS regulations, custodians and broker-dealers began reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the First-In, First-Out (FIFO) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost-basis accounting methods will need to be made before trades settle, as the cost-basis method cannot be changed after settlement.

### Recommendation of Particular Types of Securities

As disclosed under the Investment Strategies section in this brochure, we invest assets primarily in no-load mutual funds and exchange-traded funds; however, we may recommend other types of investments as appropriate for you such as non-liquid and non-publicly traded companies, interval funds, and limited liquidity real estate investments. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

**Traditional Investment Strategies:** The majority of clients' portfolios are invested in mutual funds and exchange traded funds (ETFs). Mutual funds and ETFs are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in

accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

**Alternative Investment Strategies:** We believe that alternative investment strategies can add valuable diversification benefits to portfolios that may not be obtained through investments in only mutual funds and ETFs. Where appropriate, we present certain clients with opportunities to invest in alternative strategies. These opportunities are not available to all clients and are based on several factors, including but not limited to, a client's sophistication, risk tolerance and qualifications, net worth, investment objectives, and amount of assets in client account(s). Alternative investments often are speculative, typically have higher fees than traditional investments, often include a high degree of risk and are appropriate only for eligible, long-term investors who are willing to forgo liquidity and put capital at risk for an indefinite period of time. They may be highly illiquid and can engage in leverage and other speculative practices that may increase volatility and risk of loss. Alternative investments involve complex tax structures, tax inefficient investing, and delays in distributing important tax information. Individual funds have specific risks related to their investment programs that will vary from fund to fund. Investors should consult their own tax and legal advisors as we do not provide tax or legal advice. We recommend or otherwise invest in the following alternative investments:

**Private Funds:** Private Funds are offered only to Accredited Investors as defined by Rule 501 of Regulation D and/or Qualified Clients as defined by Rule 205-3 under the Investment Advisers Act of 1940, which impose net worth or assets under management minimums. These investments include, among others, hedging strategies, real estate equity, private lending, and private equity. These investments, unlike stocks and bonds that are regularly traded, can experience illiquidity and pricing inconsistencies. As a consequence, and in compliance with existing regulations, private funds require a client's approval before any investment is made. Any client who subscribes, or proposes to subscribe, for an investment in a private fund must be able to bear the risks involved and must meet the fund's suitability requirements. Some or all alternative investment programs may not be suitable for certain investors. No assurance can be given that a private fund's investment objectives will be achieved. Private fund investments are speculative and involve a substantial degree of risk, including a total loss of principal. Private funds are generally highly illiquid, with each private fund investment having varying degrees of illiquidity depending on the type of fund and its underlying investments. There is generally no secondary market for a private fund, and none should be expected to develop. Additionally, there are restrictions on withdrawal/redemption and

transferring interests in a private fund, so investors may not have access to capital on demand. The processes and strategies for the private funds we recommend are disclosed in each private fund's offering documents. A fund's concentration in a certain sector and lack of diversification across other sectors present risks specific to its strategy and should be carefully considered. Risks specific to each private fund are outlined in each fund's offering documents and should be reviewed by the client prior to investment.

**Interval Funds:** An interval fund is a type of investment company that periodically offers to repurchase its shares from shareholders. Shareholders are not required to accept these offers and sell their shares back to the fund. Although classified as closed-end funds, they are very different from traditional closed-end funds in that:

- Their shares typically do not trade on the secondary market. Instead, their shares are subject to periodic repurchase offers by the fund at a price based on net asset value.
- They are permitted to (and many interval funds do) continuously offer their shares at a price based on the fund's net asset value.

An interval fund will make periodic repurchase offers to its shareholders, generally every three, six or twelve months, as disclosed in the fund's prospectus and annual report. Interval funds may have limits (or "gates") on the total amount of shares that can be repurchased at a given date, often for as little as 5% of outstanding shares. If more shares are tendered for redemption than the allowable limit, shareholders will not be able to sell all of the shares they desire at that particular opening.

Investing in interval funds involve a high degree of risk. In particular, interval funds are suitable only for investors who can bear the risks associated with the limited liquidity of the funds and should be viewed as a long-term investment. Limited liquidity is provided to shareholders only through the interval funds' quarterly repurchase offers for as little as 5% of the Fund's shares outstanding at net asset value. There is no guarantee that shareholders will be able to sell all of the shares they desire in a quarterly repurchase offer. An interval fund's investments are also subject to liquidity and other risks, as described in more detail below. Given the lack of secondary market, the infrequent nature of the offers to buy back shares, and the liquidity gates (or re-purchase limits), shareholders should consider the shares of interval funds to be illiquid.

**Non-Liquid and Non-Publicly Traded Companies:** Non-publicly traded companies are businesses not listed on a national securities exchange. These companies can include private equity investments and other direct or indirect positions in privately held entities (collectively, "private investments"). Because these companies do not trade on a public market, they often lack a readily available secondary market. As a result, these investments may involve higher risk and require a long-term investment horizon.

Private investments typically lack an active secondary market, making it difficult to buy or sell shares on short notice. Investors may need to hold their positions for several years, often until a liquidity event (e.g., sale, merger, or initial public offering) occurs. Valuing private, illiquid companies is inherently more subjective than valuing publicly traded



securities. Valuations often rely on assumptions, third-party appraisals, or internal models and may not reflect what an investor would actually receive if the position were sold. Overestimates or underestimates can significantly affect reported performance and investors' decisions. Private investments can offer the potential for above-market returns, although such returns are never guaranteed.

**Real Estate Investment Trust (REIT):** A Real Estate Investment Trust (REIT) is a company that owns, manages, or finances income-producing real estate. Because REITs pool funds to invest in real estate, they can offer diversification relative to other asset classes. However, they also carry specific risks relating to the real estate market, interest rates, and economic conditions. REIT performance can be influenced by factors affecting the real estate market, such as property values, rental demand, vacancy rates, and local or regional economic conditions. A downturn in any of these areas can negatively impact REIT earnings and share prices. REIT share prices and yields may be sensitive to changes in interest rates. Rising interest rates can make REITs less attractive to investors seeking income and increase borrowing costs for REITs, potentially reducing profitability and dividend distributions. Many REITs use borrowed funds to acquire properties or mortgage assets. While leverage can enhance returns in favorable market conditions, it may also amplify losses if property values or rental income decline. Additionally, if a REIT is highly leveraged, rising rates or tighter credit conditions could negatively impact its ability to refinance existing debt. Some REITs, particularly non-traded, non-listed or private REITs, may have limited liquidity. Shares may not trade on an exchange, making it difficult for investors to sell their interests at a given time or price. In contrast, publicly traded REITs usually offer daily liquidity, although market prices can fluctuate.

#### Item 9 | Disciplinary Information

Neither our firm nor any of our employees have any reportable disciplinary information.

#### Item 10 | Other Financial Industry Activities and Affiliations

Neither our firm nor our related persons are affiliated with any of the following types of firms.

- broker-dealer, municipal securities dealer, or government securities dealer or broker
- 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)
- other investment adviser or financial planner
- futures commission merchant, commodity pool operator, or commodity trading advisor
- banking or thrift institution
- accountant or accounting firm
- lawyer or law firm

- insurance company or agency
- pension consultant
- real estate broker or dealer
- sponsor or syndicator of limited partnerships

## Item 11 | Code of Ethics, Participation or Interest in Client Transactions and Personal Training

### Description of Our Code of Ethics

The employees of our firm have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The Code is designed to ensure that the high ethical standards long maintained by our firm continue to be applied. The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. The excellent name and reputation of our firm continues to be a direct reflection of the conduct of each employee.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number or email address on the cover page of this brochure.

### Participation or Interest in Client Transactions

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

### Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

The Chief Compliance Officer of our firm is Linda Lubitz Boone, CFP®. She reviews all employee trades each quarter. Her trades are reviewed by another qualified person with the firm. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are in mutual fund trades, the trades do not affect the securities markets.

## Item 12 | Brokerage Practices

### Selecting Brokerage Firms

We do not have any affiliation with custodians or product sales firms. Specific custodian recommendations are made to clients based on their need for such services. We believe that the recommended custodian provides quality execution services for you at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the recommended custodian, including the value of the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of the services the recommended custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere. Typically, accounts are established at Charles Schwab & Co. or Fidelity Brokerage Services, LLC. Clients' accounts at other custodians may also be managed.

### Best Execution

We review the execution of trades at each custodian periodically. Trading fees charged by the custodians are also reviewed on an annual basis. Because the majority of our trades are in mutual funds, only a small proportion are in traded securities. We do not receive any portion of the trading fees.

### Trade Errors

In the event a trading error occurs in your account, our policy is to restore the client's account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

### Research and Other Benefits

We maintain agreements with Charles Schwab & Co., Inc., Fidelity Brokerage Services, LLC (FSB), National Financial Services LLC (NFS), American Funds, JPMorgan, Charles Schwab Trust Company, TIAA Cref, and Nationwide to provide institutional services to our clients. While there is no direct linkage between the investment advice given and affiliation with these organizations, economic benefits are received which would not be received if our firm did not give investment advice to clients and use the services of these organizations. These benefits include: receipt of duplicate client confirmations and bundled duplicate statements, access to a trading desk serving institutional service participants exclusively, ability to have investment management fees deducted directly from client accounts, access to an electronic communications network for client order entry and account information, receipt of compliance publications, and access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors. The benefits received from these organizations may or may not depend upon the amount of transactions directed to, or amount of assets custodied by the organization. Periodically, employees of the firm may participate in vendor, mutual fund or custodian sponsored paid-for educational

conferences. We may also take advantage of certain group discounts on publications and investment research that is available through the institutional service units. Webcasts are also made available, which cover investment management, practice management, compliance, and marketing updates. Additionally, during the year, we may sponsor various client educational events and seminars, where investment strategies and market conditions, among other topics, are discussed. Periodically, we may co- sponsor these events with mutual fund companies or custodians with which we have a business relationship.

The selection of any company as a custodian for clients is not affected by this nominal benefit.

### Compensation for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

### Directed Brokerage

In limited circumstances, and at our discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our firm to use a particular broker, you should understand that this might prevent our firm from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

### Block Trades

Typically, we do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading") because we invest primarily in mutual funds which do not trade in blocks. Block trade aggregation is determined when purchases or sells for a large number of shares across multiple clients' accounts may have an impact on the security's daily trading volume.

With respect to certain types of securities, pricing may differ based on market conditions on the day of trading. Additionally, fees and/or transaction costs differ based on account types and custodians.

### Mutual Fund Share Classes

Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration cost, tax implications, and other factors. When the fund is available for purchase at net asset value, we will purchase, or recommend the purchase of, the fund at net asset value. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial

share class is available, considering cost, tax implications, and the impact of contingent deferred sales charges.

## Item 13 | Review of Accounts

### Account Reviews

Account reviews are performed on a periodic basis in consultation with the client, at least annually, by the advisor who works with each client. Account reviews may be performed more frequently when market conditions dictate (e.g., market moving events). Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

### Regular Reports

Account reviewers are all Certified Financial Planning Practitioners. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. Client Advisory Agreement - Investment Management clients receive written quarterly updates. The written updates may include a portfolio statement, market commentary, performance for specified periods, client notification, market returns and an asset allocation chart.

Clients also receive monthly statements directly from the custodian. These statements can be received in either paper format or electronic format, as elected by the client.

## Item 14 | Client Referrals and Other Compensation

### Incoming Referrals

We have been fortunate to receive many client referrals over the years. The referrals come from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. Our firm does not compensate outside referring parties for these referrals. We do compensate our employees for referrals.

### Referrals Out

We do not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred from our firm.

### Other Compensation

Please refer to the Brokerage Practices section above for disclosures on research and other benefits we may receive resulting from our relationship with the custodians we recommend.

## Item 15 | Custody

Our clients' fees are debited directly from our independent custodians' account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from our clients' accounts causes our firm to exercise limited custody over their funds or securities. We do not have physical custody of any of our clients' funds and/or securities. Our clients will receive account statements from the independent, qualified custodian(s) holding their funds and securities at least quarterly. The account statements from our clients' custodian(s) will indicate the amount of our advisory fees deducted from their account(s) each billing period. Account statements should be reviewed carefully for accuracy. We will also provide a notice to our clients reflecting the amount of the advisory fee deducted from their account.

Our clients should compare our notices with the statements from their account custodian(s) to reconcile the information reflected on each statement. Slight discrepancies may be a result of timing on recording of dividends or interest. If you have any questions regarding account statements, or if a statement was not received from the custodian, please contact us directly at the telephone number on the cover page of this brochure.

### Standing Letters of Authorization, Wire Transfer and/or Check-Writing Authority

Our firm, or persons associated with our firm, may disburse funds from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, as long as the client has provided us with written authorization to do so via the Custodian's SLOA Form. Such written authorization is known as a Standing Letter of Authorization (SLOA). An adviser with authority to conduct such third-party money movements has access to the client's assets and therefore has custody of the client's assets in any related accounts. However, our firm is not subjected to the requirement for an annual surprise audit, as we otherwise would be by reason of having custody, providing we meet the following safe harbor provisions:

1. We provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. We are authorized, in writing, to direct transfers to the third party either on a specified schedule or from time to time;
3. Our qualified custodians verify our authorization (e.g., signature review) and provide a transfer of funds notice to us promptly after each transfer;
4. We can terminate or change the instruction;
5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
7. Our qualified custodian sends us, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria.

## Item 16 | Investment Discretion

### Discretionary Authority for Trading

We accept discretionary authority to manage securities accounts on behalf of clients. We have the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold in accordance with the client's Investment Policy Statement.

The client approves the custodian to be used and will pay transaction and other fees charged directly by the custodian. We do not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in clients' accounts on their behalf so that we may promptly implement the investment policy that they have approved in writing.

### Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. The client signs a limited power of attorney so that we may execute the trades that the client has approved.

## Item 17 | Voting Client Securities

We will not vote proxies on behalf of client advisory accounts. Clients are expected to vote their own proxies. In most cases, a client will receive proxy materials directly from the account custodian.

## Item 18 | Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and we do not require the prepayment of more than \$1,200 in fees six or more months in advance of services provided. We have not filed a bankruptcy petition at any time in the past ten years. Therefore, we are not required to include a financial statement with this brochure.

## Item 19 | Requirements for State-Registered Advisers

This item is not applicable. We are registered with the U.S. Securities and Exchange

Commission.

## Item 20 | Additional Information

### Business Continuity Plan

#### General

We have a Business Continuity Plan (the Plan) in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

#### Disasters

The Business Continuity Plan covers natural disasters such as snowstorms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, fibernet communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

#### Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving or working out of an alternative office location.

### Information Security Program

#### Information Security

We make best efforts to ensure that our client personal and confidential information will be kept confidential. A confidentiality agreement is included in our practice to work toward this end. Our Policies and Procedures Manual includes an Information Security Program outlining the precautions our firm takes to protect this information.

### eMoney Advisor Platform

Meira Wealth may provide its clients with access to an online platform hosted by “eMoney Advisor” (“eMoney”). The eMoney platform allows a client to view their complete asset allocation, including Excluded Assets. Meira Wealth does not provide investment management monitoring, or implementation services for the Excluded Assets. Therefore, we shall not be responsible for the investment performance of the Excluded Assets. The client may choose to engage us to manage some or all of the Excluded Assets pursuant to the terms and conditions of a Client Advisory Agreement between Meira Wealth and the client. The eMoney platform also provides access to other types of information, including financial planning concepts, which should not, in any manner whatsoever, be construed as services, advice, or recommendations provided by Meira Wealth. We shall not be held responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the eMoney platform without our assistance or oversight.

### Class Action Lawsuits



We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you. We do not provide advice as to your participation in any legal action.

#### Questions

Meira Wealth's Chief Compliance Officer, Linda Lubitz Boone, CFP<sup>®</sup>, remains available to address any question that a client or prospective client may have regarding the above disclosures, conflicts of interest and other arrangements. She may be reached at 305.670.4440 and [linda@meirawealth.com](mailto:linda@meirawealth.com).