

STRONG WEALTH

4620 Ranch Circle
Colorado Springs, CO 80918

(812) 216-4625
www.strongwealth.net

Form ADV Part 2A – Firm Brochure

Dated June 16, 2025

Item 1: Cover Page

This Brochure provides information about the qualifications and business practices of Strong Wealth, LLC, doing business as Strong Wealth (“SW”). If you have any questions about the contents of this Brochure, please contact us at (812) 216-4625. 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.

Strong Wealth is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about Strong Wealth is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using the firm’s identification number, 316950.

Item 2: Material Changes

We will promptly update this Disclosure Brochure when material changes occur. Material changes are summarized in this section.

We will initially provide you with a copy of our Disclosure Brochure when we enter into an agreement with you. On an annual basis, we will provide you with a Summary of Material Changes within 120 days of our fiscal year end. In the alternative, we could choose to provide you with a complete copy of our Brochure.

The last annual update of this Brochure was filed on March 29, 2025. Since then, the following changes have been made:

- **Cover Page:** Our principal office location has changed.
- **Item 4:** Strong Wealth was organized as a limited liability company in Indiana in May 2022. The firm relocated its principal office to Colorado in November 2022. Mitchell Moore is the principal owner and Chief Compliance Officer.
- **Item 4:** We have updated the description of our Investment Management Services to provide additional information regarding our investment methodology, investment strategies, and types of investments. We have also clarified our discretionary authority over your investment accounts.
- **Item 4:** We have updated the description of our Financial Planning Services to describe our financial planning process and to include information regarding Bitcoin Custody Guidance, Bitcoin Inheritance Guidance, and Charitable Planning. We have also clarified that clients have the option to implement any of our recommendations.
- **Item 5:** Our annual fee for Investment Management 1.00% of assets under management. For our Ongoing Financial Planning, we impose a fixed annual fee starting at \$6,000, based on complexity, with an initial upfront fee equal to 25% of the fixed annual fee to cover the initial creation of your plan. If you also engage our Investment Management services, the Ongoing Financial Planning fees may be reduced or waived at our discretion, based on client circumstances.
- **Item 8:** We have added information regarding our investment methodologies and strategies. We have also added information regarding bitcoin risks, including concentration and volatility risks, and risks regarding digital assets.
- **Item 11:** Our firm and its employees could buy or sell securities that are the same as, similar to, or different from those we recommend to clients. We have added information on how we mitigate the conflict of interest presented by investing in the same securities in which clients invest.
- **Item 12:** We may recommend that clients use Altruist Financial LLC (“Altruist”) as a qualified custodian. We have added information regarding Altruist to Item 12. We have also added information regarding soft dollar arrangements with our custodians, and clarified our policies regarding directed brokerage.
- **Item 13:** We have added that with our Ongoing Financial Planning, we provide periodic reviews of your financial plan as changes occur in your financial circumstances, and we will provide a full review of your plan on at least an annual basis. We do not provide ongoing reviews or updates with Project-Based Financial Planning.
- **Form ADV Part 2B Brochure Supplement for Jacob Phelps:** We have added information regarding Jacob’s other business activity with Phash Mining LLC in Item 4.

Note that we have made other changes that are editorial in nature, to correct grammatical or typographical errors, to provide additional information or clarifications, or to correct formatting issues. We do not consider these changes to be material.

You can request a current copy of our Disclosure Brochure at any time without charge by contacting us at (812) 216-4625. Additional information about SW is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the firm's identification number, 316950.

As of August 1, 2025, SW managed \$14,530,294 on a discretionary basis. We do not manage assets on a non-discretionary basis.

Item 3: Table of Contents

| | |
|---|-----------|
| Form ADV Part 2A – Firm Brochure | 1 |
| Item 1: Cover Page..... | 1 |
| Item 2: Material Changes..... | 2 |
| Item 3: Table of Contents..... | 4 |
| Item 4: Advisory Business..... | 5 |
| Item 5: Fees and Compensation..... | 8 |
| Item 6: Performance-Based Fees and Side-By-Side Management..... | 10 |
| Item 7: Types of Clients..... | 10 |
| Item 8: Methods of Analysis, Investment Strategies and Risk of Loss..... | 10 |
| Item 9: Disciplinary Information..... | 14 |
| Item 10: Other Financial Industry Activities and Affiliations..... | 14 |
| Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..... | 14 |
| Item 12: Brokerage Practices..... | 16 |
| Item 13: Review of Accounts..... | 17 |
| Item 14: Client Referrals and Other Compensation..... | 18 |
| Item 15: Custody..... | 18 |
| Item 16: Investment Discretion..... | 18 |
| Item 17: Voting Client Securities..... | 19 |
| Item 18: Financial Information..... | 19 |
| Item 19: Requirements for State-Registered Advisers..... | 19 |
| Form ADV Part 2B – Brochure Supplement | 21 |
| Mitchell Moore..... | 21 |
| Jacob Phelps..... | 23 |

Item 4: Advisory Business

Description of Advisory Firm

Strong Wealth, LLC, doing business as Strong Wealth (“SW”) is a limited liability company formed in Indiana in May 2022. Strong Wealth previously operated as a sole proprietorship, which became registered as an investment adviser with the State of Indiana in January 2022. The firm relocated its principal office to Colorado in November 2022. Mitchell Moore is the principal owner and Chief Compliance Officer of SW.

Types of Advisory Services

SW provides comprehensive financial planning and investment advisory services with a specialized focus on clients who have or wish to have investments in bitcoin. Our services are designed to meet the growing demand for sound financial guidance in the digital asset space, we integrate traditional wealth management principles with a modern, bitcoin-forward philosophy.

SW offers tailored services including bitcoin-centric financial planning, investment management, and education on custody and security practices. We work closely with individuals, families, and business owners who seek to incorporate bitcoin into their long-term financial strategies.

Investment Management Services

We offer continuous and ongoing supervision and management of your investment accounts on a discretionary basis. We tailor our services to meet the individual needs of our clients. We consult with clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the client’s financial situation. From this information, we construct an Investment Policy Statement (“IPS”) that directs the management of the client’s investment accounts.

We may engage in both passive and active investing in your portfolio. When an active investment strategy aligns with a client’s portfolio needs, we utilize a dynamic asset allocation strategy called Fluvius (Latin for “river”). This approach involves exposure to investments in bitcoin, commodities, equities, and fixed income through ETFs, with allocations tailored to your risk tolerance, financial circumstances, goals, and objectives. Fluvius combines elements of passive investing, specifically using low cost passively managed ETFs as opposed to actively managed ETFs, and active trading. Please see [Item 8: Methods of Analysis, Investment Strategies and Risk of Loss](#) for additional information on how we manage client portfolios.

Account supervision is guided by your stated objectives as well as tax considerations. You may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors, subject to SW approval.

Ongoing Financial Planning

Financial planning involves an evaluation of your current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. We help you identify your financial goals and develop a plan to reach them. We do not typically provide a written financial plan; however, clients have unlimited access to our financial planning software through a secure portal. Through this secure portal (eMoney), we will discuss and review your “Financial Independence Plan,” which is a digital alternative we use in place of a written financial plan. This plan follows the same method as a written plan. It takes in your currently known variables (such as cash flow and investment allocations), as well as assumptions around future variables (such as changes in cash flow, changes in investment allocations, changes in rates of return, or changes in tax rates), and produces digital reports that detail potential future scenarios based on these variables. We utilize various reports through this

interface, such as longevity risk, detailed cash flow reports and projected taxes due. We can also change or modify variables at specific points in time to show how these changes affect your potential future scenarios. Examples of these changes are: inflation assumptions, rate of return on investment assumptions, or future large purchases (such as a house). You will have access to a modified version of these reports through your client portal in eMoney.

Once your financial plan is established, we will periodically review your plan with you and make updates as necessary to address changes in your financial situation, goals, or investment objectives. We will perform a complete review and update of your plan on at least an annual basis.

In general, the financial plan will address financial areas that are relevant to your particular financial circumstances. These areas may change and evolve over time as your needs change. Generally, these areas include, but are not limited to, the following:

- **Business Planning:** If you currently operate your own business, are considering starting a business, or are planning for an exit from your current business, we can work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to children or grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Financial Goals:** We will help you identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

- **Investment Analysis:** This may involve developing an asset allocation strategy to meet your financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.
- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.
- **Charitable Planning:** We help you explore ways to leverage your wealth and plan for philanthropic giving to support your values with charitable organizations.
- **Bitcoin Custody Guidance:** We offer education and guidance on bitcoin custody with respect to your circumstances, goals, and competence. We seek to educate and advise from an objective perspective with the goal of helping you protect yourself from errors, theft, privacy risks, and loss. We never take custody of your funds and you remain responsible for your assets.
- **Bitcoin Inheritance Guidance:** We assist you in the documentation of your bitcoin custody practices so your spouse, heirs, or estate executor can identify and access your bitcoin assets to pass them on according to your wishes. We never ask for or possess your private key data during this process. This is solely to help you ensure that your beneficiaries can actually take possession of your bitcoin assets. You retain full responsibility for the security of your bitcoin and your inheritance documents.

Financial planning services are provided on a non-discretionary basis. This means you have the option to implement any of the recommendations we make, and you are not obligated to implement any of our recommendations. Unless we are also managing your accounts under our discretionary Investment Management Services, we do not have any control over the timing or accuracy of any investment transactions that you execute. Although the financial plan could consider your tax situation or estate plan, we are not an accounting or law firm. We recommend you work closely with your attorney, accountant, or

other professionals in implementing your plan. We are happy to work with your professionals to coordinate your financial plan with your estate planning and tax planning needs.

We base our financial plans on the information you provide to us. Inaccurate or incomplete information could result in an inaccurate or incomplete financial plan. To create a financial plan, we must make certain assumptions with respect to interest and inflation rates, past trends, and future projections of the performance of the market and economy. Past performance is no indication of future performance, and we cannot offer any guarantees or promises that your goals and objectives will be met. Changes to your personal financial circumstances, goals, or objectives could cause your financial plan to become inaccurate and out of date. We recommend you notify us promptly of any changes so your plan can be updated.

Project-Based Financial Planning Services

Project-Based Financial Planning Services can be engaged on a project basis for a one-time financial plan. You will receive an electronic report, providing you with three primary items: a summary of the topics that were discussed during your engagement, a summary of the recommendations made by us, and any specific action items that you need to complete. The topics that we discuss will be specific to your requests and needs, such as those described under Ongoing Financial Planning Services above, which will be detailed in the advisory agreement. For Project-Based Financial Plans, we do not provide ongoing review or updates of the financial plan. Individuals who engage us for Project-Based Financial Planning Services can implement any planning recommendations or investment transactions on their own.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets under Management

SW currently reports \$14,530,294 discretionary and no non-discretionary assets under management (“AUM”). AUM were calculated as of August 1, 2025.

Item 5: Fees and Compensation

Please note, unless you have received this brochure at least 48 hours prior to signing an investment advisory and/or Financial Planning Agreement (collectively, “Client Contract”), you may terminate the Client Contract within five (5) business days of signing the Client Contract without incurring any penalty or fees. How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Client Contract for more detailed information regarding the exact fees you will be paying.

Investment Management Services

Investment Management consists of an ongoing annual advisory fee of 1.00% of assets under management. The fee is paid monthly in arrears based on the average daily balance throughout the month. Fees may be negotiable, and we reserve the right to offer fee waivers or discounts at our discretion, based on certain factors, such as the amount of assets under management. No change in the annual fee shall be effective without the client’s prior written consent. Your specific fee will be decided prior to engagement, and will be specified in our advisory agreement.

Advisory fees are directly debited from client accounts held at an unaffiliated third-party custodian (as further described in [Item 15: Custody](#)), or the client may choose to pay by electronic funds transfer or debit/credit card using a third-party payment processor’s secure portal through which the client can securely input banking information. Accounts initiated during a calendar month will be charged a prorated

fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

Ongoing Financial Planning

For Ongoing Financial Planning, we charge a fixed annual fee starting at \$6,000, but fees could be higher based on the complexity of your financial situation and scope of the engagement. Your specific fee will be discussed with you prior to engagement and will be set forth in the advisory agreement you sign. The total agreed upon annual fee is paid in four equal quarterly payments paid in advance, Note that some legacy clients may have different payment arrangements, as outlined in their advisory agreement. Fees are based on complexity and may be negotiable in certain cases.

If you also engage our Investment Management Services, the fees for Ongoing Financial Planning could be reduced or eliminated entirely depending on the amount of assets we manage for you. This is decided on a client-by-client basis depending on your circumstances, needs, and complexity.

The length of time required to complete the plan is dependent on several factors including the needs of the client, the client's ability to provide any necessary information and documentation, as well as the complexity of their financial situation. At no time do we require prepayment of fees six or more months in advance of providing the requested services.

Fees for this service may be paid by bitcoin, or by electronic funds transfer or debit/credit card using a third-party payment processor's secure portal through which the client can securely input banking information. This service may be terminated by either party with 30 days' written notice. Upon termination, any prepaid but unearned fees will be refunded to the client on a pro rata basis.

Project-Based Financial Planning Services

For Project-Based Financial Planning Services, we charge a fixed fee starting at \$2,500, but fees could be higher based on the complexity of your financial situation, duration of the project, and scope of the engagement. Your specific fee will be discussed with you prior to engagement and will be set forth in the Financial Planning Agreement you sign. Half of the agreed-upon fee is due upon signing of the Agreement, with the remainder due upon completion of the engagement. At no time do we require prepayment of fees of \$500 more more six or more months in advance of providing the requested services.

Fees for this service may be paid by bitcoin, or by electronic funds transfer or debit/credit card using a third-party payment processor's secure portal through which the client can securely input banking information. Project-Based Financial Planning Services will automatically terminate upon the completion of the agreed-upon project. This service may also be terminated by either party with 30 days' written notice. In the event of early termination before the upfront fee has been earned, any prepaid but unearned fees will be refunded to the client. Any earned but unpaid fees will be billed for work already completed.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of investments.

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

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

Item 7: Types of Clients

We provide financial planning and investment management services to individuals and high net-worth individuals. We do not have a minimum account size requirement.

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

Methods of Analysis

Our primary methods of investment analysis are technical, cyclical and charting analysis. Our primary investment strategies are passive and active investment strategies.

Technical analysis involves using momentum, trend, and relative strength in an effort to pick sectors or asset classes that may outperform market indices, or buying and holding of a given asset class. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. We primarily use the United States M2 Money Supply as our gauge for cycle analysis. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Charting analysis involves the gathering and processing of price and volume information for a particular security. We utilize this type of analysis infrequently and only on an as needed basis. The 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.

Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Investment Strategies

We do not completely agree with Modern Portfolio Theory, but there are some fundamental principles of this theory that we do agree with and incorporate in our investment management philosophy.

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance 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.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Passive and Active Investment Management

We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio.

Active investing involves building portfolios that employ some method, strategy or technique (or a combination of all three) that are intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce drawdowns, risk, and provide uncorrelated returns to the broader market.

We may engage in both passive and active investing in your portfolio. Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds for our clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, and bid/ask spreads.. These factors may or may not result in the lowest cost ETFs available when utilizing funds in a client's portfolio, but we strive to keep internal fund expenses as low as possible.

When an active investment strategy aligns with a client's portfolio needs, we utilize a dynamic asset allocation strategy called Fluvius (Latin for "river"). This approach involves exposure to investments in bitcoin, commodities, equities, and fixed income through ETFs, with allocations tailored to your risk tolerance, financial circumstances, goals, and objectives. Fluvius combines elements of passive investing, specifically using low cost passively managed ETFs as opposed to actively managed ETFs, and active trading. By integrating these approaches, Fluvius aims to dynamically adjust holdings to emphasize asset class segments showing positive relative strength and momentum, while maintaining diversification and adhering to risk management principles.

Currently, we offer two Fluvius strategies – a three-sleeve and a four-sleeve strategy. The three-sleeve strategy includes allocations to bitcoin, equities, and commodities (via ETFs), and the four-sleeve includes those three asset classes plus fixed income ETFs. We solely use ETFs within the Fluvius strategies. This is designed to lower risk across the portfolio, because we are not relying on specific companies to drive performance within the equity sleeve, as an example. It is also important to note that we use a Bitcoin ETF for exposure to bitcoin in our Fluvius strategies. We are not using spot bitcoin. Accounts are rebalanced to the asset allocation targets on a quarterly basis and the specific holdings in each allocation can change as often as monthly.

Fluvius employs technical trend, momentum, and relative strength filters to evaluate a pre-selected group of ETF securities, aiming to identify those exhibiting strong momentum within a positive trend. This

strategy seeks to dynamically adjust client allocations based on current market conditions, using a predetermined signal derived from market data to shift to cash when appropriate. The approach is grounded in a disciplined process that relies on historical market data to guide allocation decisions, rather than speculative predictions about future market movements.

All clients are thoroughly educated on the investment strategy we would implement on their behalf prior to any initial investment changes. We require written agreement from all clients regarding their recommended investment strategy prior to their initial investment with us via an investor policy statement that clearly outlines the strategy, allocations, and risks associated.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

- **Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.
- **Strategy Risk:** We use proprietary strategies and investment models. Our investment strategies and/or investment techniques may not work as intended.
- **Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.
- **Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.
- **Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.
- **Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments. A portfolio highly concentrated in bitcoin may lack diversification, increasing vulnerability to bitcoin-specific market or systemic risks.
- **Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.
- **Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.
- **Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

- **Volatility Risk:** Volatility risk is the potential for an investment's value to fluctuate unpredictably due to rapid and significant price changes in the market. It reflects the uncertainty or instability of an asset's returns, meaning the price could swing widely in either direction—up or down—over a short period.
- **Catastrophic Events:** In addition to general market risks, investments could be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber-attacks, or network outages. The extent and impact of any such event on investment strategies will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions, the effect on the supply chain, overall consumer confidence, and the extent of the disruption to global and domestic markets.
- **Geopolitical Risk:** This is the risk of financial and market loss because of political decisions or disruptions in a particular country or region.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

- **Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.
- **Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. SW has no control over the risks taken by the underlying funds in which you invest. When you invest in ETFs, you indirectly bear a proportionate share of any fees and expenses payable directly by those funds. Therefore, you will incur higher expenses, many of which may be duplicative. In addition, your overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).
- **Digital assets** are broadly defined as any digital representation of value, which is recorded on a cryptographically-secured distributed ledger or any similar technology to establish ownership. Digital assets include, but are not limited to, convertible virtual currencies, cryptocurrencies, fungible and non-fungible tokens, and other digital tokens or files media. Digital assets are susceptible to rapid volatility and reduced liquidity. To help mitigate the risks associated with digital assets, we provide exposure to bitcoin in client portfolios through the use of a bitcoin ETF. Because digital asset markets are evolving, regulatory changes at the federal or state level may materially affect the value or legality of bitcoin-related investments.

Item 9: Disciplinary Information

Criminal or Civil Actions

SW and its management persons have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

SW and its management persons have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

SW and its management persons have not been involved in legal or disciplinary events that are material to an evaluation of SW or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Neither SW or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither SW or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Neither SW or its management persons have any relationship or arrangement with any related parties.

SW only receives compensation directly from clients. SW does not receive compensation from any outside source.

Recommendations or Selections of Other Investment Advisers

SW does not recommend or select other investment advisers for our clients.

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

Code of Ethics Description

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our clients. A summary of the Code of Ethics' Principles is outlined below.

- **Integrity** - Access persons shall offer and provide professional services with integrity.
- **Objectivity** - Access persons shall be objective in providing professional services to clients.
- **Competence** - Access persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- **Fairness** - Access persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- **Confidentiality** - Access persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- **Professionalism** - Access persons conduct in all matters shall reflect the credit of the profession.

- **Diligence** - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its access persons, or any related person is authorized to recommend to a client or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its employees could buy or sell securities the same as, similar to, or different from, those we recommend to clients. Investing in securities in which clients also invest presents a potential conflict of interest, as our firm or employee accounts could benefit from market activity influenced by client transactions, there could be opportunity to prioritize personal trades over client trades, or timing overlap could lead to situations where personal trades receive better or execution than client trades when execution occurs at or around the same time. To help mitigate this conflict of interest, we primarily recommend ETFs as investments for client accounts. Because ETFs hold a diversified basket of securities and follow pre-established index methodologies, the risk of an employee's personal investments materially conflicting with client interests is significantly reduced. Additionally, ETFs trade as a whole rather than as individual stocks, minimizing concerns about front-running or preferential treatment. Our Code of Ethics requires our firm and its employees to place client interests ahead of their own in all investment decisions and prohibits trading in a manner that disadvantages clients.

Trading Securities At/Around the Same Time as Client's Securities

The firm and its related persons are prohibited from front-running or otherwise engaging in trading activity that would disadvantage the trading in client accounts. When trade orders are aggregated, securities transactions on behalf of our firm or its employees may be executed simultaneously with client transactions when participating in an aggregated trade. See [Item 12: Brokerage Practices](#) below for more information on our order aggregation practices.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Strong Wealth does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending broker-dealers, we have an obligation to seek the "best execution" of transactions in client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the broker-dealer's services. The factors we consider when evaluating a broker-dealer for best execution include, without limitation, the broker-dealer's:

- Execution capability;
- Commission rate;

- Financial responsibility;
- Responsiveness and customer service;
- Custodian capabilities;
- Research services/ancillary brokerage services provided; and
- Any other factors that we consider relevant.

With this in consideration, our firm may recommend Altruist Financial LLC (“Altruist”) or Charles Schwab & Co., Inc. (“Schwab”) as a qualified custodian for client accounts. Both Altruist and Schwab are independent and unaffiliated SEC-registered broker-dealers and members of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). We have established relationships with Altruist and Schwab that facilitate our management of client accounts. Through programs that these qualified custodians make available to independent advisers, they offer technology and tools designed to help financial advisors achieve better outcomes. Although clients may request us to use a broker-dealer of their choosing, we generally recommend that clients open brokerage accounts with Altruist or Schwab. The client will ultimately make the final decision of the custodian to be used to hold the client’s investments by signing the selected broker-dealer’s account opening documentation.

Research and Other Soft-Dollar Benefits

Schwab and Altruist may provide us with certain brokerage and research products and services that qualify as “brokerage or research services” under Section 28(e) of the Securities Exchange Act of 1934 (“Exchange Act”). This is commonly referred to as a “soft dollar” arrangement. These research products and/or services will assist us in our investment decision making process. Such research generally will be used to service all of our client accounts, but brokerage charges paid by the client may be used to pay for research that is not used in managing that specific client’s account.

Schwab and Altruist offer advisory platforms that serve independent investment advisory firms like ours. They provide our clients and our firm with access to their institutional brokerage services (such as trading, custody, reporting, and related services), many of which are not typically available to retail customers. Schwab and Altruist also make available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. These support services are generally available on an unsolicited basis (that is, we do not have to request them) and at no charge to us. The benefits received by our firm do not depend on the number of brokerage transactions directed to the custodian. As part of our fiduciary duties to clients, we at all times must put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm in and of itself creates a potential conflict of interest and may indirectly influence our choice of Schwab or Altruist for custody and brokerage services. This conflict of interest is mitigated by our regular best execution reviews of using and selecting custodians to ensure our recommendation remains appropriate. Following is a more detailed description of the support services that may be provided by Schwab and/or Altruist:

- **Services That Benefit Clients:** The institutional brokerage services offered by Schwab and Altruist include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. The services described in this paragraph generally benefit clients and their accounts.
- **Services That May Not Directly Benefit Clients:** Schwab and Altruist also make available to us other products and services that benefit us but may not directly benefit clients or client accounts. These products and services assist us in managing and administering our clients’ accounts. They

include investment research. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab or Altruist. In addition to investment research, Schwab and Altruist also makes available software and other technology that: provide access to client account data (such as duplicate trade confirmations and account statements); facilitate trade execution and allocate aggregated trade orders for multiple client accounts; provide pricing and other market data; facilitate payment of our fees from our clients' accounts; and assist with back-office functions, recordkeeping, and client reporting.

- **Services That Generally Benefit Only Us:** Schwab and Altruist also offer other services intended to help us manage and further develop our business enterprise. These services include: educational conferences and events; consulting on technology, compliance, legal, and business needs; and publications and conferences on practice management and business succession.

Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

We execute client transactions directly with the custodian that holds the client account. We do not allow clients to direct us to execute transactions through a specific broker-dealer.

Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or access persons may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13: Review of Accounts

Clients who engage us for investment management services will have their account(s) reviewed regularly on a quarterly basis by Jacob Phelps, Chief Bitcoin Officer and Director of Financial Planning. The account(s) are reviewed with regards to the client's investment policies and risk tolerance levels. Clients are invited to meet with the firm at least annually.

Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

SW will provide performance updates to Investment Management clients on an annual basis. We urge clients to compare these reports against the account statements they receive from their custodian.

For our Ongoing Financial Planning services, we will review and update the financial plan as changes occur in the client's financial circumstances. We will provide a complete review and update of the financial plan on at least an annual basis. We do not provide periodic reports.

For Project-Based Financial Planning, we do not provide any review, ongoing monitoring, or reports. During or after termination of a Project-Based Financial Planning engagement, you may choose to engage us for Investment Management Services. You would then fall under the standard review procedures for a continuous investment management client outlined above.

Item 14: Client Referrals and Other Compensation

Aside from the soft dollar benefits disclosed in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

SW does not accept or maintain physical custody of client funds or securities. However, SW is deemed to have constructive custody when it directly deducts its advisory fees from custodial accounts. For client accounts in which SW directly debits their management fee:

- SW will send a copy of its invoice to the custodian at the same time that it sends the client an itemized invoice.
- The custodian will send monthly statements to the client showing all disbursements for the account, including the amount of the management fee.
- The client will provide written authorization to SW, permitting advisory fees to be paid directly from the client's account(s) held by the custodian.

Clients should receive monthly statements from the broker-dealer, bank or other qualified custodian that holds and maintains clients' investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

For those client accounts where we provide Investment Management Services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. This means we have the authority to make investment decisions and execute transactions in your accounts without obtaining your prior approval for each specific trade. This authority is granted through an investment advisory agreement and allows us to manage your portfolio in accordance with your stated investment objectives, risk tolerance, and any reasonable restrictions you may impose. While we exercise discretion, we are obligated to act in your best interest at all times. We do not manage assets on a non-discretionary basis.

Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account(s). Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients may limit our discretion by requesting certain restrictions on investments. However, approval of such requests are at the firm's sole discretion.

Item 17: Voting Client Securities

We do not vote client proxies. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct

the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of \$500 or more in fees six months or more in advance.

Item 19: Requirements for State-Registered Advisers

Principal Officers

Mitchell Moore serves as SW's sole principal. Information about Mitchell Moore's education, business background, and outside business activities can be found on his ADV Part 2B, Brochure Supplement attached to this Brochure.

Outside Business

We are not involved in outside business activities.

Performance-Based Fees

Neither SW nor Mitchell Moore is compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at SW has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

SW nor Mitchell Moore have any relationship or arrangement with issuers of securities.

STRONG WEALTH

4620 Ranch Circle
Colorado Springs, CO 80918

(812) 216-4625
www.strongwealth.net

Form ADV Part 2B – Brochure Supplement

Dated June 16, 2025

For

Mitchell Moore

Founder and Chief Compliance Officer

This brochure supplement provides information about Mitchell Moore that supplements the Strong Wealth (“SW”) brochure. A copy of that brochure precedes this supplement. Please contact Mitchell Moore if the SW brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Mitchell Moore is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 7221143.

Item 2: Educational Background and Business Experience

Mitchell Moore

Born: 1997

Educational Background

- 2019 – Bachelors of Science in Business Finance, Indiana University

Business Experience

- 09/2021 – Present, Strong Wealth, Founder and CCO
- 01/2020 – 08/2021, Charles Schwab & Co., High Net Worth Specialist
- 08/2017 – 12/2019, Indiana University, Student
- 08/2016 – 05/2017, IUPUC, Student
- 01/2016 – 05/2016, Franklin College, Student
- 08/2015 – 12/2015, Purdue University, Student
- 08/2011 – 05/2015, Seymour High School, Student

Item 3: Disciplinary Information

Mitchell Moore has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Mitchell Moore is not involved with outside business activities.

Item 5: Additional Compensation

Mitchell Moore does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through SW.

Item 6: Supervision

Mitchell Moore as Chief Compliance Officer of SW, is responsible for supervision. Supervision is administered through the application of and adherence to written policies and procedures. Clients may contact Mitchell Moore at the phone number on this brochure supplement. Mr. Moore will abide by and adhere to all applicable industry rules and regulations in addition to the firm's written supervisory procedures and Code of Ethics.

Item 7: Requirements for State Registered Advisers

Mitchell Moore has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

STRONG WEALTH

4620 Ranch Circle
Colorado Springs, CO 80918

(812) 216-4625
www.strongwealth.net

Form ADV Part 2B – Brochure Supplement

Dated June 16, 2025

For

Jacob Phelps

Director of Financial Planning

This brochure supplement provides information about Jacob Phelps that supplements the Strong Wealth (“SW”) brochure. A copy of that brochure precedes this supplement. Please contact Mitchell Moore, Chief Compliance Officer, if the SW brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Jacob Phelps is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 7031015.

Item 2: Educational Background and Business Experience

Jacob Phelps

Born: 1993

Educational Background

- 2016 – Bachelor of Science in Agricultural Economics, Purdue University

Business Experience

- 8/2024 – Present, Phash Mining LLC, Owner and Operator
- 7/2023 – Present, Strong Wealth, Director of Financial Planning
- 06/2021 – 07/2023, Illumination Wealth Management, Financial Planner
- 11/2020 – 06/2021, Bonfire Financial, Financial Planner
- 08/2018 – 10/2020, Korhorn Financial Group, Financial Planner
- 06/2016 – 08/2018, Wells Fargo Bank, Business Banking Analyst

Item 3: Disciplinary Information

Jacob Phelps has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Jacob Phelps is the sole owner and operator of Phash Mining LLC, which was established for the primary purpose of operating Bitcoin mining activities, including the acquisition, management, and operation of Bitcoin mining hardware and infrastructure. The company may also, as necessary to fund and support its operations, engage in the buying, selling, and transfer of Bitcoin and other digital assets. His duties are the management of the mining machines themselves and the associated bitcoin mining income they produce. The company has no outside investors, clients or employees and does not transact with or solicit any other businesses or individuals. This activity occupies approximately four hours per month, the majority of which are during normal securities trading hours.

Item 5: Additional Compensation

Jacob Phelps does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through SW.

Item 6: Supervision

Mitchell Moore, as Chief Compliance Officer of Strong Wealth, is responsible for supervision. Supervision is administered through the application of and adherence to written policies and procedures. He can be contacted at the phone number in Item 1 this Brochure Supplement.

Item 7: Requirements for State Registered Advisers

Jacob Phelps has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.