

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

Brochure prepared on 03/28/2023



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This brochure provides information about the qualifications and business practices of Finn Wealth Management LLC.

If you have any questions about the contents of this brochure, please contact us at 866-346-6946 or peter@winwithfinn.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Finn Wealth Management LLC 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.

Additional information about Finn Wealth Management LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

This brochure will be amended anytime there is a material change and this section will include a summary of any material changes.

2023 Annual Update Amendment

Item 4: Updated assets under management numbers

Item 5: Removed unnecessary language, LPL transition assistance

Item 10: Removed life insurance agent language as it is no longer applicable

Item 12: Removed LPL transition assistance, removed redundant language

Item 14: Removed LPL transition assistance

Item 19: Removed insurance agent reference

ADV Part 2B: Removed insurance agent and LPL transition assistance

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Item 4 Advisory Business

About Our Firm

Finn Wealth Management LLC is a wealth management firm based in the state of Washington that offers investment management and financial planning to clients primarily in Alaska, North Carolina, and Washington. Finn Wealth Management LLC first became registered as an investment adviser firm in 2022. Peter Finn is the sole owner of Finn Wealth Management LLC.

Advisory Services We Offer

Financial Planning: Services offered include budgeting, goals-based planning where we help you identify your goals and apply a dollar value to them, and cash-flow based planning where we show you year by year how your income and expenses will impact your overall financial position. Financial planning is an important part of responsible investment management, so it is included as part of what you are paying for with your advisory fee.

Investment Management: Management of client investments can be on a discretionary or non-discretionary basis. If you wish to have your account managed on a discretionary basis, we will require that you sign a document granting us discretionary authority over your account(s). When a client grants us discretionary authority, this means we may execute transactions in their account without their prior consent, including time, price, and security selection discretion. Investment tools we use include stocks, bonds, exchange traded funds (ETFs), mutual funds, options contracts (the only options we use at this time are covered calls), and structured products. Investment portfolios are either managed directly by Finn Wealth Management LLC or by asset management firms accessed through our custodians.

Clients will have investment portfolios recommended to them based on their individual risk tolerance, time horizon, and investment objectives. Clients may choose to not be invested in a particular kind of investment, e.g., structured products or options, because they either feel they do not understand the investment or they feel it is too complicated. Clients may also restrict investment in particular individual company stocks, perhaps because it is where they work and they already hold it in their 401k, or other reasons.

Business Planning: We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals. There is no additional cost for these services.

We may periodically send out a newsletter or provide educational seminars and workshops, or entertainment for clients and/or prospective clients. There is no additional cost for these services.

We do not use a wrap fee program.

Amount of Discretionary/Non-Discretionary Assets Under Management

We have \$2,878,496 assets under management on a discretionary and \$76,296 assets under management on a non-discretionary basis as of 03/28/2023.

Item 5 Fees and Compensation

How We Calculate and Bill Our Fees

Finn Wealth Management LLC is compensated from advisory fees calculated by taking the assets being actively managed as reported by the custodian multiplied by an annual fee rate. The maximum fee rate is 2.00% and is negotiable. If a client has multiple managed accounts, all of the accounts will be billed at the same fee rate and the accounts will be identified via contract addendum. Advisory fees are deducted from Client accounts by the custodian at the direction of Adviser on either a monthly or quarterly basis.

Monthly Advisory Fee Explanation and Example

If monthly billing is being used, advisory fees are deducted in advance directly from client accounts on a monthly basis at one-twelfth of the annual fee rate multiplied by the ending balance of the account as reported by the custodian during the prior month. For example, an account that ended the month of January with a value of \$100,000 and an annual fee rate of 1.00% would have \$83.33 deducted from the account at the beginning of February.

Given that fees are billed in advance, if a client terminates the advisory relationship, a refund of the fee billed for that month will be given on a pro rata basis. For example, if an account is billed \$100 for the month of April (a 30-day month), and the account is closed or the advisory relationship is terminated on the 10th day of that month, a fee rebate of \$66.67 will be issued (20 days remaining in the month divided by the 30 total days in the month comes out to 66.67%, which would be \$66.67 if the fee is \$100). Similarly, the initial management fee will be prorated based upon the number of days the account was open in the initial billing period. Accounts containing only unmanaged or static client assets will not be charged as part of the management fee calculation.

Quarterly Advisory Fee Explanation and Examples

Currently LPL Financial is the only custodian at which we use quarterly billing, so the quarterly billing examples will be based on LPL Financial's billing methodology.

Billing Example Assumptions

Account Fee	1.75%	Fee Cycle	Mar/June/Sep/Dec
Initial Deposit	\$100,000	Initial Deposit Date	06/14/2016
Quarter End Value	\$105,000	Quarter End Date	06/30/2016

Initial Billing Example

The information in the table above will be used to illustrate both advanced billing (how client accounts are normally billed) and arrears billing (only applicable to new accounts), and how the initial billing will be done when an account is first opened.

Advanced Billing

Advanced billing is done on a quarterly basis and is the primary way account fees are assessed to advisory accounts. In this example, the account is on cycle three indicating the quarter end value

of \$105,000 was taken on June 30th. To calculate advanced billing LPL Financial assumes a 360 day year and quarters lasting 90 days. Calculations are as follows:

$$[\text{Quarter End Value} \times \text{Advisory Account Fee}] / 360 \times 90 \text{ Days} = \text{Advance Billing}$$

$$[\$105,000 \times 1.75\%] / 360 \times 90 = \mathbf{\$459.38}$$

Arrears Billing

Arrears billing is a necessary adjustment which charges an account for assets deposited before a fee is assessed because advisory accounts are typically billed in advance. In this example, the account was funded with \$100,000 on June 14th and is on cycle three indicating the accounts quarter ends on June 30th. To calculate arrears billing the number of days the initial deposit has been in the account must be determined. The initial deposit for this example has been in the account for 17 days. Calculations are as follows:

$$[\text{Initial Deposit} \times \text{Advisory Account Fee}] / 360 \times \text{Prorated Days} = \text{Arrears Billing}$$

$$[\$100,000 \times 1.75\%] / 360 \times 17 = \mathbf{\$82.64}$$

Total Initial Billing

$$\text{Arrears Billing} + \text{Advanced Billing} = \text{Total Initial Billing}$$

$$\$82.64 + \$459.38 = \mathbf{\$542.02}$$

Subsequent Billing Example

Subsequent Billing Example Assumptions

Account Fee	1.75%	Fee Cycle	Mar/June/Sep/Dec
Deposit	\$100,000	Deposit Date	10/15/2016
Withdrawal	\$50,000	Withdrawal Date	11/20/2016
Deposit	\$25,000	Deposit Date	12/25/2016
Quarter End Value	\$300,000	Quarter End Date	12/31/2016

The subsequent billing in this example will account for the advanced billing and make adjustments for deposits and withdrawals made during the quarter.

Advanced Billing

Advanced billing is done on a quarterly basis and is the primary way Account Fees are assessed to advisory accounts. In this example, the account is on cycle three indicating the quarter end value of \$300,000 was taken on December 31st. To calculate advanced billing LPL Financial assumes a 360 day year and quarters lasting 90 days. Calculations are as follows:

$$[\text{Quarter End Value} \times \text{Advisory Account Fee}] / 360 \times 90 \text{ Days} = \text{Advance Billing}$$

$$[\$300,000 \times 1.75\%] / 360 \times 90 = \mathbf{\$1,312.50}$$

Quarterly Billing Adjustment

Quarterly billing adjustments account for any deposits or withdrawals made during the quarter. These adjustments ensure the client is only being charged for assets which have resided in their account over time. In this example, the account had a \$100,000 deposit on October 15th, \$50,000 withdrawal on November 20th and a \$25,000 deposit on December 25th. To calculate the billing adjustments the number of days each deposit and withdrawal was in the account must be determined. The number of days for each deposit and withdrawal in this example are as follows; first deposit: 78 days, second deposit 7 days, and the withdrawal 42 days. Calculations are as follows:

$$[\text{Deposit or Withdrawal} \times \text{Advisory Account Fee}] / 360 \times \text{Prorated Days} = \text{Billing Adjustment}$$

10/15 Deposit: $[\$100,000 \times 1.75\%] / 360 \times 78 = \mathbf{\$379.17}$

11/20 Withdrawal: $[- \$50,000 \times 1.75\%] / 360 \times 42 = - \102.08

12/25 Deposit: $[\$25,000 \times 1.75\%] / 360 \times 7 = \8.51

Total Billing Adjustments = $\$379.17 - \$102.08 + \$8.51 = \285.60

Total Subsequent Billing

Advanced Billing + Total Billing Adjustments = **Total Subsequent Billing**

$\$1,312.50 + \$285.60 = \$1,598.10$

Other Fees Clients May Pay

Clients may pay internal expenses for mutual funds and exchange traded funds (ETFs) as well as third party manager fees when applicable. Clients may also be charged a custodial fee or mark-ups or mark-downs or other commissions by the custodian at which their account is held. Finn Wealth Management LLC does not receive compensation from these fees and commissions. These additional fees will be paid by the client in addition to the Finn Wealth Management LLC advisory fee. The advisory fee paid by the client including the Finn Wealth Management LLC advisory fee, plus any custodian advisory fee, plus any third-party manager advisory fee, will not exceed a combined total of 2.00%. These fees may be higher than normally charged in the industry and similar services may be offered by another adviser at a lower fee.

Additional Compensation for Sale of Securities or Other Investments

Finn Wealth Management LLC does not receive any additional compensation from the sale of securities or other investment products.

Brochure Delivery

If a client does not receive the Brochure at least 48 hours prior to entering into an investment advisory agreement, the advisory client has a right to terminate the contract without penalty within five business days after entering into the contract.

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

Finn Wealth Management LLC does not use performance-based fees or side-by-side management of accounts that are billed using a different methodology than the fee schedule listed above.

Item 7 Types of Clients

Finn Wealth Management LLC provides investment advice to individuals, so-called high net worth individuals, trusts, businesses, and non-profit organizations. We do not impose a minimum account size.

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

Methods of Investment Analysis and Associated Risks

Fundamental Analysis: Fundamental analysis includes a review of a company's balance sheet, cash flow, and general financial health, as well as how the company has been trending in terms of its revenue growth and profit margins. The general principal at work here is that

if you as a client are going to put money into any business, you want to make sure it is financially sound.

There are several notable risks specific to fundamental analysis. The first is that the data being used is from the past, and it does not guarantee that the company will continue to be financially sound. The second is that the fundamentals of a company do not necessarily have any bearing on the price of a stock; this is especially true in euphoric or panicked markets where people are buying or selling on collective waves of emotion rather than careful analysis. The third is that fundamental analysis does not account for changes in a company's industry or leadership that could adversely impact the company's stock.

Strategic Analysis: Strategic analysis evaluates the ability of a business to grow based on the industry in which it operates, the strength of its competitors, the uniqueness of its products, and the quality and behaviors of its leadership. It is a good counterweight to fundamental analysis because it covers many of that method's gaps. The major risk of strategic analysis is that it is qualitative and is therefore, by definition, imprecise, and vulnerable to errors. It also does not account for the major emotional factors at play in a market.

Technical Analysis: Technical analysis looks at a stock's price, volume, and momentum to determine whether a stock will be moving up or down and how far in either direction. While some people think there is something fundamental or rational behind technical analysis, we view it more as a way to gauge the emotional sentiment of the market around a particular security or index. The material risk involved with technical analysis methods is that they depend on past trends repeating themselves in the future, and this may not be the case.

Memetic Analysis: Memes are ideas that replicate rapidly and spread throughout a population. Memetic analysis uses various information sources to determine which ideas are propagating and have weight behind them, e.g., they can persuade people to buy or sell stocks or change their general consumption patterns in a way that will impact stocks. These ideas can be a simple news announcement or be more complex cultural phenomenon. The major risk of memetic analysis is, of course, that it can be inaccurate. It is also heavily on the emotional side and therefore it can run contrary to fundamental analysis of a company and lead to a situation where a stock looks like a good investment because of the memetic power behind it even though it is in poor financial health and there don't seem to be real economic prospects in favor of it.

It is important to remember that no matter how much analysis is done and how good that analysis may be, it is not possible to eliminate the risk of loss of some or all of your money that is put into an investment. It is crucial for you to carefully consider whether you are willing to bear such risk before investing your money.

Long vs. Short Term Strategies and Associated Risks.

Long Term Strategies: Finn Wealth Management LLC will generally make investments as part of a long-term strategy, meaning individual bonds and structured products will be held to maturity, and stocks, exchange traded funds (ETFs), and mutual funds will be bought under the

assumption that they will remain good investments for at least a year. We will re-evaluate existing holdings managed directly by Finn Wealth Management LLC as opposed to third party managers at least once per year to ensure that there have not been material changes to the companies involved that would prompt us to sell an investment sooner than originally planned. We will also re-evaluate third party investment managers at least once per year to ensure they continue to provide the best possible solutions for our clients.

The major risk of taking a long-term approach to investing is that you as an investor will likely have to suffer emotionally through the periodic market-wide ups and downs that are a part of investing, particularly in the stock market. This can create emotional distress in a client that will lead to impulses to make poor short-term decisions with negative long-term consequences for their portfolio. We encourage you to be open to our risk assessment to ensure you are comfortable emotionally with the risks you are taking.

Short Term Strategies: Clients seeking the best performance possible may want to use more actively managed stock portfolios with a shorter-term focus. These portfolios can be significantly more volatile and will require a great deal of emotional discipline to stay invested through ups and downs in the market. These portfolios may be updated once a month or more and can create significant short-term or long-term capital gains taxes if done in a taxable account (as opposed to a tax-advantaged retirement account). In addition to possible adverse tax consequences, frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs. You as an investor should be aware of this potential tax liability and prepare accordingly. A major risk of this approach is that with the pursuit of greater performance comes the higher possibility of losses. Clients using this approach should be prepared to lose some or all of the money invested.

Types of Investments and Associated Risks

Finn Wealth Management LLC does not primarily recommend any particular type of security over any other. Each client's situation is evaluated individually and investments are chosen accordingly. Our investments include stocks, bonds, exchange traded funds (ETFs), mutual funds, structured products, and options (specifically covered calls). All of these can involve significant risks, including the loss of the principal investment. Structured products and covered calls are less common, so descriptions and risks associated with those particular investments are shared below.

Structured products are bonds with payments tied to the performance of a derivative, like a typical stock index (e.g., the S&P 500), an individual stock, or some kind of commodity-linked index (e.g., an oil or gold ETF). Because they are bonds, structured products do have credit risk tied to the issuer of the bond which can cause you to lose some or all of the money invested. Each structured product is unique and it is therefore important to understand any the risks involved with each individual investment. Most structured products will contain an element of each of the following risks:

- Market – The risk that the investment will lose value due to market fluctuation.
- Credit – The risk that the issuer of the bond will default on its obligatory payment(s) to you.
- Liquidity – The risk that you won't be able to sell at a fair price at your convenience. This is particularly a problem if it turns out you have an unexpected need for the money you invested.

- Inflation/Interest Rate – The risk that you buy into an investment with a maturity some distance in the future under the assumption that you will get a set of payments at a rate which looked good when you bought it, but will underperform what you would get if you bought a new equivalent investment at the rates available in the future.
- Statement Risk – Structured products sometimes have protections built into them that only take effect when the investment matures. Before that happens, structured products are “priced” on your statement in a way that may make it look like you are going to lose more money than is actually the case if you hold the investment to maturity.
- Upside Risk – the risk that you will not participate in the gains you would have received had you invested directly in an index or commodity rather than using the structured product.

Covered calls are an options strategy designed to increase the income from a stock portfolio in exchange for giving up some of the growth potential of the stocks involved. If the stocks in your portfolio which are tied to a covered call strategy go past a certain value, referred to as a strike price, your stocks will be sold and you will not participate in any market gains in those stocks beyond that strike price.

Item 9 Disciplinary Information

Finn Wealth Management LLC does not have any legal or disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Neither Finn Wealth Management LLC nor its members or employees have any affiliation or pending application to be affiliated with any broker-dealer, futures commission merchant, commodity pool operator, or as a commodity trading advisor.

Material Relationships Presenting Potential Conflicts of Interest

Finn Wealth Management LLC does not use nor select third party investment advisers that involve compensation to us or a conflict of interest.

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

Finn Wealth Management LLC operates in a fiduciary capacity to our clients and thus legally obliged to act in our client’s best interests. We have a fiduciary to put client’s interests first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith. We base our code of ethics on the standards set by the Investments and Wealth Institute (IWI) which are centered around the following:

- Integrity

- Loyalty
- Objectivity
- Ethical Conduct

In addition to this code, we consider transparency to be a core value of our company culture and we strive to ensure that every client understands exactly what is being done on their behalf and why. To the degree required by law and regulatory authority, we will maintain a written code of ethics covering prohibited purchases and sales, insider trading, exempt transactions, personal securities transactions, prohibited activities, conflicts of interest, gifts and entertainment, confidentiality, service on a board of directors or other influential positions, compliance procedures, compliance with laws and regulations, procedures and reporting, certification of compliance, reporting violations, compliance officer responsibilities, training and education practices, recordkeeping, annual review of applicable policies and procedures and their implementation, and sanctions.

Finn Wealth Management LLC will provide a copy of this code of ethics upon the request of a client or prospective client.

Potential Conflicts of Interest in Trading Client Funds

Neither Finn Wealth Management LLC nor its' owner has a material financial interest in the securities we recommend. Members and employees of Finn Wealth Management LLC may trade personal accounts in some of the same portfolios used for clients. This can lead to a conflict of interest because the member or employee may be able to trade his account in a way that takes advantage of the market movement he knows will be created when he trades the rest of the client accounts. In order to avoid this possibility, member and employee account(s) will be included in aggregated trading with client accounts assigned to the same portfolio, thus ensuring the member or employee does not receive an unfair pricing advantage.

Item 12 Brokerage Practices

Broker-Dealer Affiliation & Conflicts of Interest

Finn Wealth Management LLC does not have any affiliation with broker-dealers. To the degree that we receive research, trading tools, or other investment tools as a result of utilizing a particular custodian (referred to as soft dollar benefits), this benefit is not tied to us keeping a certain amount of client assets with that custodian and there is no conflict of interest to be resolved.

Broker-Dealer/Custodian Referral Arrangements

Finn Wealth Management LLC does not receive any client referrals from broker-dealers or other third parties as a result of having clients at one custodian vs another.

Selection of Custodians

Finn Wealth Management LLC uses several custodians. We do not recommend these custodians based on their execution prices for transactions, commissions, mark-ups, or mark-downs, but rather based on whether they provide the toolkit best suited to meet an individual client's needs.

We use three custodians:

Altruist Financial, CRD 299274: For the benefit of fully digital account opening, a large variety of security options, and complete integration with software tools, Finn Wealth Management LLC recommends Altruist Financial LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to Apex Clearing Corporation, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the clients' custodian. Finn Wealth Management LLC does not receive any research or other soft-dollar benefit by nature from its relationship with Altruist Financial LLC. Finn Wealth Management LLC does not receive any referrals in exchange for using Altruist Financial LLC as a broker dealer.

Finn Wealth Management LLC participates in the Model Marketplace of Altruist LLC (CRD 299398), an SEC-registered investment adviser and affiliate of Altruist Financial LLC (CRD 299274). Finn Wealth Management LLC may assign to client accounts any of the available Altruist LLC-generated portfolios, Third-Party Portfolios, or other portfolios made available through Altruist LLC's Model Marketplace. Altruist LLC's Model Marketplace fees are automatically deducted from Finn Wealth Management LLC's house account or passed through to and debited from clients' accounts, according to the instruction of Finn Wealth Management LLC. Altruist LLC and its affiliates do not act as investment advisers or fiduciaries to Finn Wealth Management LLC clients. Finn Wealth Management LLC is responsible for suitability of all investment decisions and transactions for client accounts subscribed to Model Marketplace model portfolios. Model Market Place Fees may be located at <https://altruist.com/legal/>.

Clients are not able to work directly with Altruist LLC for investment advisory services. Altruist LLC charges a fee of \$1 per account per month which is paid by Finn Wealth Management LLC.

LPL Financial ("LPL") CRD 6413: LPL may charge a custody fee in addition to commissions or other fees on trades that settle into your LPL account. Finn Wealth Management LLC ("Adviser") receives support services and/or products from LPL Financial, many of which assist the Adviser to better monitor and service program accounts maintained at LPL Financial; however, some of the services and products benefit Adviser and not client accounts. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related publications

- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products and services used by Finn Wealth Management LLC in furtherance of its investment advisory business operations

LPL Financial may provide these services and products directly, or may arrange for third party vendors to provide the services or products to Adviser. In the case of third party vendors, LPL Financial may pay for some or all of the third party's fees.

These support services are provided to Adviser based on the overall relationship between Adviser and LPL Financial. It is not the result of soft dollar arrangements or any other express arrangements with LPL Financial that involves the execution of client transactions as a condition to the receipt of services. Adviser will continue to receive the services regardless of the volume of client transactions executed with LPL Financial. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Adviser to LPL or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement. However, because Adviser receives these benefits from LPL Financial, there is a potential conflict of interest. The receipt of these products and services presents a financial incentive for Adviser to recommend that its clients use LPL Financial's custodial platform rather than another custodian's platform.

Charles Schwab & Company ("Schwab") CRD 5393: Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account, however most stocks and exchange traded funds (ETFs) no longer incur a commission. Schwab provides us and our clients with access to its institutional brokerage - trading, custody, reporting and related services - many of which are not typically available to Schwab retail customers. Schwab also makes 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. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us.

Services at Schwab that Benefit You

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services at Schwab that May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial

number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab 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; o facilitate payment of our fees from our clients' accounts; and
- Assist with back-office functions, recordkeeping and client reporting.

Aggregating Trading for Client Accounts

Finn Wealth Management LLC aggregates orders for various accounts in order to ensure fair pricing and efficient trading whenever this is possible and prudent. Certain circumstances, such as an advisory account being opened or receiving a deposit in the middle of a month, or a client requesting a specific omission or addition to a portfolio in addition to the standard portfolio used by other clients, may prevent us from aggregating orders for that account at that time.

Directed Brokerage Practices

Because we generally recommend a custodian to you and choose to execute our transactions through that custodian, we are effectively requiring clients to “direct” their brokerage to that custodian. Only on a case-by-case basis will we accept instruction from you to direct transactions to a broker dealer other than the custodian we have recommended to you. Not all advisers execute through a single broker-dealer or request their clients to do so. Because we are not typically selecting a broker on a trade-by-trade basis, we may not be able to achieve the most favorable execution of client transactions and this practice may cost clients more money.

Item 13 Review of Accounts

Peter Finn (CRD# 6455286), the CCO and owner of Finn Wealth Management LLC, will manage client accounts and conduct reviews of suitability, performance and consistency with the client's investment objectives. Reviews will typically be done once per year as having reviews more frequently than once per year can cause clients to be too focused on the short term when their overall investment and planning strategies should be focused on the long term, and an annual review is a more appropriate benchmark for this. Accounts may be reviewed more frequently if macroeconomic events could significantly impact a client's portfolio value, if there are changes to a client's circumstances, or if their investment strategy necessitates more frequent reviews. In addition, clients may have their financial plan updated at the same time as the review or throughout the year as the need arises, e.g., in the event a client has a change in employment or other circumstances.

Clients will receive written statements and trade confirmations from the custodian(s) on a monthly or quarterly basis as well as annual tax statements. Clients will also receive a monthly or quarterly report outlining the fees they are paying including:

- Fee calculation formula
- Amount used to calculate the fee
- Fee rate used to calculate the fee
- Time period used to calculate the fee
- Custodian of the account

Finn Wealth Management LLC is responsible for ensuring fee invoices are delivered.

Item 14 Client Referrals and Other Compensation

Finn Wealth Management LLC does not receive any economic benefits for providing investment advice or services to clients from third. Finn Wealth Management LLC does not compensate any person who is not a member or employee for client referrals.

Item 15 Custody

Finn Wealth Management LLC does not take custody of client funds with the exception of the withdrawal of client funds to pay advisory fees which is done directly by the custodian(s). Whenever advisory fees are deducted from a client account, Finn Wealth Management LLC will ensure a statement of fees is sent to the client including:

- Fee calculation formula
- Amount used to calculate the fee
- Fee rate used to calculate the fee
- Time period used to calculate the fee
- Custodian of the account

The client will not receive any account statements other than those sent to them by the custodian(s). Clients are urged to compare the account statements they receive from the qualified custodian with invoices and any statements/reports they receive from Finn Wealth Management LLC and to call us using the contact information at the beginning of this brochure if they have any questions.

Item 16 Investment Discretion

Finn Wealth Management LLC accepts both discretionary and non-discretionary authority to manage trades in client accounts. When discretionary authority is granted to us, this includes both the selection of securities to be bought and sold as well as the time and price at which

securities will be bought and sold. We do not customarily accept limitations on discretion granted to us.

Clients select whether an account is discretionary or non-discretionary when they fill out our investment advisory agreement.

Item 17 Voting Client Securities

Finn Wealth Management LLC does 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, clients will receive proxy materials directly from the account custodian. However, in the event Finn Wealth Management LLC were to receive any written or electronic proxy materials, they would be forwarded by mail or email to the client depending on the client's preferences.

Item 18 Financial Information

Client Prepayment Requirements

Finn Wealth Management LLC does not require or solicit prepayments of more than \$500 in fees per client six months or more in advance.

Financial Condition

Finn Wealth Management LLC does not have any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

Past Bankruptcy Petitions

Neither Finn Wealth Management LLC or its owner have been the subject of a bankruptcy petition at any time during the past ten years.

Item 19 Requirements for State-Registered Advisers

About the Owner

The principal executive officer and sole owner and member of Finn Wealth Management LLC is Peter Finn. Peter started his career in the wealth management industry with Merrill Lynch Wealth Management in February of 2015 and worked continuously there until starting Finn Wealth Management LLC in 2022. In addition to the industry licenses required by law in order to operate Finn Wealth Management LLC, Peter also possesses several professional designations:

- Chartered Retirement Planning Counselor designation from the College for Financial Planning
- Chartered Advisor in Philanthropy designation from the American College

-Certified Private Wealth Advisor designation from the Investments and Wealth Institute

Peter received a BA in Political Science from the University of Alaska in 2016.

Outside Business Activities

There are no outside business activities to be disclosed.

Performance Based Fees

There are no performance-based fees to be disclosed.

**Disclosure of Awards from Civil, Self-Regulatory Organization, Administrative Proceedings,
or Arbitrations**

There are no awards or findings of liability to be disclosed.

Relationships with Issuers of Securities

There are no relationships to disclose.

ADV Part 2B



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This brochure supplement provides information about Peter Finn that supplements the Finn Wealth Management LLC Brochure, ADV Part 2A

If you have any questions about the contents of this brochure, please contact us at 866-346-6946 or Peter@Winwithfinn.com The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Peter Finn also is available on the SEC's website at
www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Peter Finn was born in 1986. He started his career in the wealth management industry with Merrill Lynch Wealth Management in February of 2015 and worked continuously there until starting Finn Wealth Management LLC in 2022.

Peter received a Bachelor's Degree from the University of Alaska System.

In addition to the industry licenses required by law in order to operate Finn Wealth Management LLC, Peter also possesses several professional designations including:

Chartered Advisor in Philanthropy (CAP®)

Peter is a Chartered Advisor in Philanthropy (CAP®) professional. The advisor earning the CAP® designation has taken three graduate school courses in philanthropy including planning for impact in the context of family wealth, charitable strategies, and gift planning in a nonprofit context. The courses are offered through the Irwin Graduate School of The American College, a non-profit educator founded in 1927 and the highest level of academic accreditation. CAP® advisors must meet experience, ethics, and continuing education requirements to use the credential.

The Certified Private Wealth Advisor® (CPWA®)

The Certified Private Wealth Advisor® (CPWA®) designation signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for the professional designation, which is centered on private wealth management topics and strategies for high net-worth clients.

Prerequisites for the CPWA designation are a Bachelor's degree from an accredited college or university or one of the following designations or licenses: CIMA®, CIMC®, CFA®, CFP®, ChFC®, or CPA® license; have an acceptable regulatory history as evidenced by the FINRA Form U-4 or other regulatory requirements and five years of professional client-centered experience in financial services or a related industry. CPWA designees have completed a rigorous educational process that includes self-study requirements, an in-class education component, and successful completion of a comprehensive examination. CPWA designees are required to adhere to IMCA's Code of Professional Responsibility and Rules and Guidelines for Use of the Marks. CPWA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through the Investment Management Consultants Association (IMCA), in conjunction with The Booth School, the University of Chicago.

Chartered Retirement Planning Counselor (CRPC®)

Chartered Retirement Planning Counselor (CRPC) is a professional financial planning designation awarded by the College for Financial Planning. Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

Item 3 - Disciplinary Information

There are no awards or findings of liability to be disclosed.

Item 4 - Other Business Activities

There are no other business activities to be disclosed.

Item 5 – Additional Compensation

There is no additional compensation to be disclosed.

Item 6 - Supervision

Peter Finn is the Chief Compliance Officer of Finn Wealth Management LLC and sole supervisor of the firm, including his own activities, in the areas of client services and advice, investment policies, forms and procedures, day to day operations, general management of the firm and compliance related matters.

Item 7 – Requirements for State-Registered Advisors

Peter Finn has never been the subject of a bankruptcy petition.