



EARN INTO WEALTH

STRATEGIES

Earn Into Wealth Strategies, LLC

1460 Broadway
New York, NY 10036

Form ADV Part 2A – Firm Brochure

(646) 494-6220
www.earnintowealth.com

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This Brochure provides information about the qualifications and business practices of Earn Into Wealth Strategies, LLC, "EIWS". If you have any questions about the contents of this Brochure, please contact us at (646) 494-6220 or at contact@earnintowealth.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. Earn Into Wealth Strategies, LLC is registered as an Investment Adviser with the States of New Jersey and New York. Registration of an Investment Adviser does not imply any level of skill or training. Additional information about EIWS is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the firm's identification number 281923.

Item 2: Material Changes

Any material changes during the year made will be reported here.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure via electronic or hard copy form. Clients are also able to download this brochure from the SEC's website: www.adviserinfo.sec.gov

Important Information

Throughout this document Earn Into Wealth Strategies, LLC shall also be referred to as "EIWS", "the firm", "firm", "our", "we" or "us." The client or prospective client may also be referred to as "you," "your," etc., and refers to a client engagement involving a single person as well as two or more persons. The term "advisor" and "adviser" are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.)

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Item 4: Advisory Business

Description of Advisory Firm

Earn Into Wealth Strategies, LLC is a boutique fee-only financial planning firm catering to individuals and families. The firm is registered as an Investment Adviser. We were founded in September 2015. Kaya Ladejobi is the principal owner and Chief Compliance Officer of EIWS.

Our firm provides a broad range of financial planning and investment advisory services to individuals and families. Our primary focus is to provide financial planning services, which include areas such as cash flow and budgeting, retirement planning, debt repayment, risk management and estate planning. We offer investment advice as applicable to clients who have a comprehensive planning arrangement with us. We believe it is important to understand a client's full financial picture prior to recommending investment options.

We hold ourselves to a *fiduciary standard* which means our firm will act in the utmost good faith and perform in a manner believed to be in the best interest of our clients. As fiduciaries, we are obligated to put *you-our client-first*. In addition, by being a fee-only firm, we believe we can truly offer unbiased financial advice without the conflict of interest typically associated with commissions-based compensation.

Types of Advisory Services Offered

Earn Into Wealth Strategies, LLC provides a broad range of financial planning solutions to its clients. For those interested in areas such as cash flow and budgeting, education funding, retirement planning, risk management, estate planning, tax planning, as well as periodic investment advice, we offer our *financial planning and investment consultation services*.

Additionally, we offer investment advisory services through the use of third-party money managers ("outside managers") for portfolio management services. Based on analysis of suitability for the customer, we recommend the appropriate type of account, the appropriate amount of money that should be invested to meet the client's goals as well as an appropriate asset allocation model. We also assist clients in selecting an appropriate allocation model, completing the outside managers' investment profile questionnaire, and interacting and reviewing the outside manager. This service also includes the ongoing monitoring of the account(s) and client goals, reinvestment of capital gains and dividends, rebalancing and tax optimization. Additionally, we will meet with clients periodically and as needed to discuss changes in financial goals, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to these services are outlined in item 5 of this brochure.

During or prior to your first meeting with our firm, you will be provided with a current Form ADV Part 2 advisory brochure that includes a statement with regard to our privacy policy. We will also ensure that we disclose any material conflicts of interest that could be reasonable expected to impair the rendering of unbiased and objective advice.

Should you wish to engage with Earn Into Wealth Strategies, LLC for its advisory services, we must first enter into a written agreement (our client services agreement). Thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. It is important that the information and/or financial statements you provide are accurate. Our firm may, but is not obligated to, verify the information you have provided, which will then be used in the financial planning and investment advisory process.

Depending on the scope of the engagement, you may be asked to provide copies of the following documents early in the process:

- Wills, codicils and trusts
- Divorce decree
- Insurance policies
- Mortgage Information
- Financial data that may include tax returns, W-2's or 1099s, job offer letter, and/or paystubs
- Information on retirement plans and benefits provided by your employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements you may have in place
- Credit reports
- Credit Card balances and interest rates
- Auto, home loans, HELOC's and other liabilities
- Completed risk profile questionnaires or other forms provided by our firm

Our ability to provide our advisory services depends on access to essential information about our clients, and it is important that the information and financial statements you provide are complete and accurate. Our firm may, but is not obligated to, verify the information you have provided which will then be used in the financial planning or investment advisory process. In addition, it is necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including, but not limited to; source of funds, income levels, and an account holder or their legal agent's authority to act on their behalf of the account, among other information. This helps us determine the appropriateness of our planning and/or investment strategies for your situation.

Financial Planning and Investment Consultation Services

Financial planning and investment consultation services may be as broad-based or narrowly focused as you desire. The incorporation of most or all the listed components allows not only a more thorough analysis but also an in-depth view of your plans to assist you in reaching your goals and objectives.

Cash Flow and Debt Management

A review of your income and expenses will be conducted 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. Recommendations may also be made with respect to appropriate cash reserves for emergencies and other financial goals, and a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

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 disability, death, property and casualty losses. Advice may be provided on ways to minimize such risks and how to weigh the costs of purchasing insurance vs. retaining the risks and not purchasing insurance.

Employee Benefits

We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible in your employee benefit programs. 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.

Retirement Planning

Retirement planning services typically include projections depicting the likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, a recommendation may include showing you the impact on those projections by making changes in certain variables (i.e. working longer, saving more, spending less, taking more risk with investments or career). If you are near a life-change, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or paying high taxes and penalties.

Tax Planning Strategies

Advice may include ways to minimize current and future income taxes as 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 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.

Education Planning

College, Post-Graduate, or Certification funding advice may include projecting the amount that will be needed along with saving and/or borrowing strategies, evaluating sources of funds, and the "pros-and-cons" of various funding options.

Estate Planning

Review and advice usually involve an analysis of your exposure to estate taxes and your current estate plan; determining whether you have a will, financial and health care 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 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 someone 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.

Investment Consultation

Investment consultation services may involve providing information on the types of investment vehicles available, employee stock options, investment analysis and strategies, asset selection and portfolio design, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian (collectively, we term as "service providers"). The strategies and types of investments we may recommend are further discussed in item 8 of this brochure.

Periodic Review

We strongly urge our clients to notify us of any change in their circumstances, and to schedule a review any time there is such a change. An annual review should be considered because tax laws, estate laws, and investment options change frequently.

Our Financial Planning Service Offerings

We have tailored our services in two ways to cater to our client needs. The first offering is the **Comprehensive Financial Planning Package** which involves access to all the different topics described above as applicable to the client. This service involves working one-on-one with a planner over an extended period. There is an upfront fee and an on-going monthly fee for this package, clients get continuous access to a planner who will work with them to design their plan. The planner and client will work together to monitor the plan, identify any needed changes and ensure the plan is up to date.

Upon desiring a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, education planning and estate planning. Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow up meeting is required, we will meet at the client's convenience. The plan and the client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the client to confirm that any agreed upon action steps have been carried out. For on-going clients, a full review of this plan will be conducted on an annual basis to ensure its accuracy and ongoing appropriateness. At any time during the year, clients can also reach out to update us on any life changes that they would want incorporated into their plan. We believe financial plans are living documents that should be updated as frequently as needed to keep up with life changes.

Our second offering is the **Project-Based Planning Package** which are limited-scope engagements focused on a specific area that is most pressing for the client. This option is recommended for clients who feel that the Comprehensive Financial Planning Package offers more than what they need. We have designed our project-based packages based on the most frequent questions we get from prospects and individuals seeking financial planning assistance. Clients are welcome to select one or more of these service offerings. Clients needing assistance in multiple areas of financial planning might find it more economical to engage in the comprehensive planning package. Clients should also note that investment advisory services and in-depth tax planning strategies are reserved for those with a comprehensive planning package or project-based client who have signed an additional agreement for those services.

Sample Project-Based Packages

1. Quick Start Package

This package is designed to help clients gain clarity on 2 to 3 pressing financial concerns/topics. (See brochure for full details).

2. Foundations of Wealth Package

This Package is designed to help our clients build a solid foundation upon which their long-term wealth will be based. Converting earned income into lasting wealth is no easy feat and requires tremendous discipline and smart planning. While cash-flow planning, budgeting, and establishing an emergency fund might seem trivial, they comprise the bedrock of a great financial plan. (See brochure for full details).

Educational Workshops

We offer periodic financial educational sessions for those desiring general advice on personal finance and investing. Topics may include cover many aspects of financial planning, including risk management, cash management, investment planning, income tax, retirement planning and estate conservation. The fees charged for educational workshops are described in our response to Item 5 – Fees and Compensation.

Seminars will be general in nature and limited to educational and impersonal advice.

The information provided at a seminar is not intended to address any attendee's personal financial situation, and attendees will not be obligated to implement any advice, recommendation or information they receive through EIWS or any other party. Seminars provided to groups of employees are not intended as "employee benefits" covered by ERISA or any other law.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all our clients depending on the engagement package selected.

However, specific client financial plans and their implementation are dependent upon a client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Our clients retain full discretion over all implementation decisions and are free to accept or reject any recommendation that we make. It will remain the client's responsibility to promptly notify us if there is any change in circumstances that the adviser must take into account.

Wrap Fee Programs

We do not participate in wrap fee programs.

Other General Information

Earn Into Wealth Strategies does not provide legal, accounting, or insurance services. With your consent, we may work with other professional advisors or service providers to assist with coordination and implementation of the accepted recommendations. You should be aware that these other professionals will charge you separately for their services and these fees will be in addition to our own advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. We cannot warrant or guarantee the achievement of a planning goal or any level of account performance or that your accounts will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account.

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that a client may have under federal and state securities laws.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Project-Based Engagements (Fixed Fee)

The fees associated with our a la carte project-based planning services typically range from \$499 to \$10,000 per project. Project fees take into consideration factors such as the estimated amount of time needed for the engagement as well as the complexity of your project based on your needs and financial profile. Credit towards a comprehensive financial planning package will be provided to clients who decide to upgrade within 90 days of a project-based engagement.

Comprehensive Financial Planning (Fixed Fee: One-Time Upfront Fee & On-Going Annual Fee)

We offer our full comprehensive financial planning package on a fixed fee basis plus an on-going annual fee (pro-rated & can be billed monthly, quarterly, or semi-annually) based on the complexity of the engagement. We are passionate about making financial planning accessible to young professionals still growing into their careers and have thus adopted an income-sensitive pricing and monthly installment billing to accomplish this. The fee for our comprehensive planning package consists of a one-time upfront charge ranging from \$999 to \$4,999 per plan and an on-going annual fee (pro-rated & can be billed monthly, quarterly, or semi-annually) ranging from \$1500 to \$5000 per year. Fees are negotiable. The upfront fee is based on the time and expertise required to gather client data/goals, research as needed, and build a plan for the client. The annual fee is based on an estimated 12-20 hours annually to assist in executing, delivering, monitoring, and updating your plan. In the event of early termination by Client any fees for the hours already worked will be due and any completed work, such as completed sections of the financial plan and analysis, will be given to the Client. Any unearned fees will be refunded to the client on a pro-rated basis. Clients who wish to terminate during a 12-month engagement period will be billed on an a la carte basis for the services rendered at the applicable hourly rate. Client fees will be reviewed annually by the firm and adjusted up or down based on client's income and needs. Should any material changes happen to a client's income, our firm will review and address requests for changes or a temporary suspension of the client's on-going monthly fees. Alternatively, clients can also elect for a plan-only package where the financial plan is delivered to the client without further assistance or involvement by the advisor. Fees for the plan-only comprehensive package can range between \$2400 to \$10,000 depending on the client's needs and financial complexity.

Hourly Fees

On a limited basis we may be engaged for our services on an hourly fee arrangement. This is typically for clients requiring supplemental assistance, incidental advice or an abbreviated review session that exceeds what their initial engagement covers. The hourly rate is \$150 to \$350 per hour; billed in 15-minute increments, and a partial increment will be treated as a whole increment. The hourly fee rate will take into consideration such factors as the expertise necessary for the type of engagement, services to be rendered, as well as any unique requirements the client may require. We require a minimum of one-hour for any hourly-based engagements. Prior to entering into an agreement with the firm you will receive an estimate of the overall cost based on your requirements and the time involved.

Asset Based Fees

The investment advisory fee is based on the market value of the account and is calculated as follows:

Account Value	Annual Investment Advisory Fee	
	Non-Financial Planning Clients	Financial Planning Clients
All Accounts	1.00%*	Services included in quoted annual fee. Betterment has a 0.20% platform fee.

*For Betterment For Advisors Accounts, the fees include Betterment's platform fee charge of 0.20% for access to the custodian's platform and tools.

For investment advisory-only clients, the investment advisory fees are pro-rated and paid in arrears on a quarterly basis. The outside manager will debit the client's account for both the outside manager's fee, the firm fee, and will remit the firm's fee to EIWS. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated 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.

Educational Workshops and Public Appearances

We may also assess a fixed fee for our educational workshops, that are payable by the individual attendee or the workshop sponsor, such as an affinity group, or employer. The fee ranges from \$50 to \$500 per workshop per attendee and will depend on the length of the event, topics to be covered, its location and other relevant factors. The fee is announced and generally due in advance of the presentation. We may also provide pro bono workshops/seminars at our own discretion.

Discounting Fees

The services to be provided to you and their specific fees will be detailed in your engagement agreement. Our published fees may be discounted by our firm and can be negotiable. We strive to offer fees that are fair, reasonable and allows us to provide you with a high degree of service and attention. If you are unable to afford our services, it might be possible for you to obtain comparable services from another source at a lower rate.

Client Payment of Fees

Fixed and Hourly Fees

Fees are due as stated in your engagement agreement with our firm; typically, at least 50% upfront with the balance due upon plan delivery. Fees are generally due upon the receipt of the firm invoice. The on-going annual fee (pro-rated & can be billed monthly, quarterly, or semi-annually) is due at the start of the interval period. Fees may be paid by check, cards, or draft from a US-based financial institution, as well as through automated payment processing through a qualified, unaffiliated third-party processor (e.g. Pay Pal or

Freshbooks). Installment plans costs the firm more resources to administer, therefore there will be a 3% convenience fee added to fees due on installment. We do not accept cash, money orders or similar forms of payment for our engagements.

Additional Client Fees

Any transactional or service fees (sometimes termed *brokerage fees*) assessed by a selected service provider, individual retirement account fees, qualified retirement plan or account termination fees, wire transfer fees will be borne by the account holder and are per those provided in current, separate fee schedules of any selected service provider. Fee paid by our clients to our firm for our advisory services are separate from any of these fees, transaction charges, or other similar charges.

We reserve the right to suspend our advisory services once an account is deemed past-due.

Charged Prepayment of Client Fees

Advance Payment of Certain Services

As stated in your agreement with the firm, we may require an initial deposit of \$500 or one-half of your engagement fee, whichever is greater, for our hourly, project-based, or full comprehensive planning. Any remaining fees will be due upon delivery of your plan/advice. Full payment upfront may be required for those doing a one-time project to be delivered within 6 months. Monthly fees are due at the beginning of each month. Educational workshop fees are to be paid in advance of each session as announced.

Termination of Services

Either party may terminate the agreement at any time, which will typically be in writing. If you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute.

If our Form ADV Part 2 advisory brochure was not delivered to you at least 48 hours prior to entering onto the investment advisory contract with our firm, then you have the right to terminate the engagement without penalty within five business days after entering into the agreement. Should you terminate an engagement with us after this time, you may be assessed fees for services rendered and/or the preparation of your plan on a prorated basis per the firm's stated hourly rate within your agreement. We will return any prepaid, unearned fees (if any) within 30 days upon receipt of a written termination notice.

Our firm will not be responsible for future allocations, investment advice, or transactional services upon receipt of a termination notice.

Should an education workshop attendee cancel within 24 hours of the first session, fees are normally not subject to a refund due to the operational costs borne by our firm. We may allow the fees paid to be credited towards a future educational workshop or event that we sponsor.

External Compensation for the Sale of Securities to Clients

Our firm is engaged in fee-only services and will not charge or receive a commission or mark-up on your securities transactions, nor will a commission be paid to us on your purchase of a securities holding that we may recommend to a client. Our firm does not receive "trailer" or SEC Rule 12b-1 fees from an investment company (such as a mutual fund) that may be recommended to you. Fees charged by issues are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. You will always have the option to purchase recommended investments through your selected service provider.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's 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 mutual funds.

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

We do not offer performance-based fees.

Item 7: Types of Clients

We provide advisory services to individuals and families of all income levels and investing experience. We do not have a minimum account size requirement or other similar pre-conditions. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or preexisting relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

Methods of Analysis and Investment Strategies

We believe investment advisory are an important aspect of financial plan, and view your investments as a portion of the overall plan. We believe in long-term investment strategies such as asset allocation, diversification, dollar-cost averaging, and periodic rebalancing.

When we are engaged to provide investment advice, we will first gather and consider several factors, including your:

- current financial situation
- current and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance or appetite for risk
- reasonable investment restrictions involving your account(s)

Our research is drawn from sources that include financial periodicals, reports from economists and other industry professionals, annual reports as well as prospectuses and other regulatory filings. We also evaluate economic factors including interest rates, the current state of the economy, or the future growth of an industry sector.

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary investment strategy is passive investment.

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised 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. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

Investment Vehicles Generally Recommended

We typically recommend portfolios that contain investment vehicles considered diversified, tax-efficient and low-cost whenever practical. It would be common to find a broad range of index funds, no-load and/or no transaction fee mutual funds, and ETFs within a portfolio that we have designed. We may also recommend an investor retain pre-existing holdings when appropriate.

We make asset allocation and investment policy decisions based on the above-mentioned factors among others. We will discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

Material Risks Involved

At this time, our firm does not provide investment management, however investment recommendations may be made as part of the financial planning service. **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: The Adviser's 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.

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.

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.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Hedge Funds are alternative investments using pooled funds that may employ different strategies in order to return "alpha" for investors. This investment vehicle is not suitable for all investors and typically involves a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative investment practices, commodity trading, complex tax

structures, a lack of transparency in the underlying investments, and generally the absence of a secondary market.

Private Placements are a funding round of securities which are sold not through a public offering, but rather through a private offering mostly to a small number of chosen investors. Typically, interested parties in such an offering have to be classified as accredited investors as defined by the SEC. Private placements carry substantial risk as they are largely unregulated offerings not subject to securities laws.

Peer to Peer (P2P) Lending is the large-scale lending of money between people online, typically to unrelated individuals and/or businesses. Typically, P2P loans are high yielding, “short” duration, and can carry substantial risk due to the unsecured nature of such debt and generally the absence of a secondary market. This type of investment is a relatively new class and can be put into the alternatives or fixed income bucket for asset allocation.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Mutual Funds & 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. These funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. Though more diversified than individual stocks, mutual funds and ETFs still carry the risks associated with the underlying securities.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client’s 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). 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) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) 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. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

Item 9: Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management. We have no information applicable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

No EIWS employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No EIWS employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

EIWS does not have any related parties. As a result, we do not have a relationship with any related parties.

EIWS only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

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

As a fiduciary, our firm and its associates have 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 our dealings.

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated 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 - Associated 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 - Associated 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 - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We will, upon request, promptly provide a complete code of ethics.

A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over our clients.

To reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific securities transactions. Any exceptions or trading pre-clearance must be approved by our Chief Compliance Officer in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

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

1. Research and Other Soft-Dollar Benefits

We may receive soft dollar benefits such as proprietary research, software tools, and access to sponsored seminars from custodians or broker-dealers.

2. 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.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice.

The Custodian and Brokers We Use

EIWS does not maintain custody of your assets, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We may recommend that our clients use MTG, LLC dba Betterment Securities (“Betterment Securities”), a registered broker-dealer and member of the SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we may recommend that you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment for Advisors (defined below).

Your Brokerage and Custody Costs

For our clients’ accounts that Betterment Securities maintains, Betterment Securities does not charge you separately for custody/brokerage services, but is compensated as part of the Betterment for Advisors (defined below) platform fee, which is charged for a suite of platform services, including custody, brokerage, and sub-advisory services provided by Betterment and access to the Betterment for Advisors platform. The platform fee is an asset-based fee charged as a percentage of assets in your Betterment account. Clients utilizing the Betterment for Advisors platform may pay a higher aggregate fee than if the investment management, brokerage and other platform services are purchased separately. Nonetheless, for those Clients participating in the Betterment for Advisors platform, we have determined that having Betterment Securities execute trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most

favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

Services Available to Us via Betterment for Advisors

Betterment Securities serves as broker-dealer to Betterment for Advisors, an investment and advice platform serving independent investment advisory firms like us (“Betterment for Advisors”). Betterment for Advisors also makes available various support services which may not be available to Betterment’s retail customers. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Betterment for Advisors’ support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Betterment for Advisors’ support services:

1. **SERVICES THAT BENEFIT YOU.** Betterment for Advisors includes access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities. In addition, a series of model portfolios created by third-party providers are also available on the platform. Betterment Securities’ services described in this paragraph generally benefit you and your account.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment for Advisors 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, such as software and technology that may: – Assist with back-office functions, recordkeeping, and client reporting of our clients’ accounts. – Provide access to client account data (such as duplicate trade confirmations and account statements). – Provide pricing and other market data.
3. **SERVICES THAT GENERALLY BENEFIT ONLY US.** By using Betterment for Advisors, we may be offered other services intended to help us manage and further develop our business enterprise. These services include: – Consulting (including through webinars) on technology and business needs. – Access to publications and conferences on practice management and business succession.

OUR INTEREST IN BETTERMENT SECURITIES’ SERVICES The availability of these services from Betterment for Advisors benefits us because we do not have to produce or purchase them. In addition, we do not have to pay for Betterment Securities’ services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment for Advisors and Betterment Securities’ services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities’ services (see “How we select brokers/custodians”) and not Betterment for Advisors and Betterment Securities’ services that benefit only us or that may not directly benefit you.

BETTERMENT FOR ADVISORS’ TRADING POLICY When using the Betterment for Advisors platform, we and you are subject to the trading policies and procedures established by Betterment. These policies and procedures limit our ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within your account. You should not expect that trading on Betterment is instant, and, accordingly, you should be aware that Betterment does not permit you or us to control the specific time during a day that securities are bought or sold in your account (i.e., to “time the market”). Betterment describes its trading policies in Betterment LLC’s Form ADV Part 2A. As detailed in that document, Betterment generally trades on the same business day as it receives instructions

from you or us. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day. Betterment also maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session. Betterment also generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session. Betterment continues placing orders associated with deposit and withdrawal requests until market close. Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements. Furthermore, Betterment may delay or manage trading in response to market instability. For further information, please consult Betterment LLC's Form ADV Part 2A.

Aggregating Trading for Multiple Client Accounts

Outside Managers used by EIWS may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12. Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments, we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Item 13: Review of Accounts

Kaya Ladejobi, Principal and CCO of EIWS, will work with clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. EIWS does not provide specific reports to clients, other than financial plans.

Item 14: Client Referrals and Other Compensation

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.

We receive a non-economic benefit from Betterment for Advisors and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose

clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Betterment for Advisors' and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Item 15: Custody

EIWS does not accept custody of client funds. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's 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.

For client account in which EIWS directly debits their advisory fee:

- i. EIWS will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The client will provide written authorization to EIWS, permitting them to be paid directly for their accounts held by the custodian.

Item 16: Investment Discretion

We use Outside Managers for investment management, and therefore do not exercise discretion to determine the types of securities purchased or the amount of securities bought and sold for the account. We do however, have discretion over the asset allocation of each account. Investment discretion is explained to clients in detail when an advisory relationship has commenced. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

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

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

Item 19: Requirements for State-Registered Advisers

Kaya Ladejobi

Educational Background

- 2015 – Certificate in Financial Planning, New York University
- 2013 – Masters of Business Administration, Cornell University
- 2006 – Bachelor of Science in Finance, University of Maryland, College Park

Business Experience

- 09/2015 – Present, Earn Into Wealth Strategies, LLC, Principal and CCO
- 06/2013 – 09/2015, Unilever, Associate Brand Manager
- 07/2010 – 08/2011, The Private Bank & Trust Company, Private Banking Officer
- 07/2007 – 06/2010, JP Morgan Private Wealth Management, Private Wealth Management Analyst

Professional Designations, Licensing & Exams

Certified Financial Planner™ - CFP® certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP® Board. They must pass a comprehensive CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct. Individuals who become certified must complete the following ongoing continuing education and ethics requirements to maintain the right to continue to use the CFP® marks:

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

Passed the Series 65 Exam (September 2015). The Series 65 is the Uniform Investment Advisor Law exam designed to qualify candidates as investment adviser representatives.

Other Business Activities

Kaya Ladejobi also runs Your Money MBA, LLC an umbrella financial education company that provides financial education, trainings, and workshops.

Performance Based Fees

EIWS is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Earn Into Wealth Strategies, LLC 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

Earn Into Wealth Strategies, LLC, nor Kaya Ladejobi, have any relationship or arrangement with issuers of securities.

Earn Into Wealth Strategies, LLC

1460 Broadway

New York, NY 10036

(646) 494-6220

www.earnintowealth.com

Dated March 31, 2018

Form ADV Part 2B – Brochure Supplement

For

Kaya Ladejobi

Principal, and Chief Compliance Officer

This brochure supplement provides information about Kaya Ladejobi that supplements the Earn Into Wealth Strategies, LLC (“EIWS”) brochure. A copy of that brochure precedes this supplement. Please contact Kaya Ladejobi if the EIWS brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Kaya Ladejobi is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 5654328

Item 2: Educational Background and Business Experience

Kaya Ladejobi

Educational Background

- 2015 – Certificate in Financial Planning, New York University
- 2013 – Masters of Business Administration, Cornell University
- 2006 – Bachelor of Science in Finance, University of Maryland, College Park

Business Experience

- 09/2015 – Present, Earn Into Wealth Strategies, LLC, Principal and CCO
- 06/2013 – 09/2015, Unilever, Associate Brand Manager
- 07/2010 – 08/2011, The Private Bank & Trust Company, Private Banking Officer
- 07/2007 – 06/2010, JP Morgan Private Wealth Management, Private Wealth Management Analyst

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- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

Passed the Series 65 Exam (September 2015). The Series 65 is the Uniform Investment Advisor Law exam designed to qualify candidates as investment adviser representatives.

Item 3: Disciplinary Information

No management person at Earn Into Wealth Strategies, LLC has ever 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

Kaya Ladejobi is not involved with outside business activities.

Item 5: Additional Compensation

Kaya Ladejobi does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through EIWS.

Item 6: Supervision

Kaya Ladejobi, as Principal and Chief Compliance Officer of EIWS, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

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