



**Earn Into Wealth Strategies, LLC**  
1460 Broadway  
New York, NY 10036

**Form ADV Part 2A – Firm Brochure**  
(646) 494-6220  
[www.earnintowealth.com](http://www.earnintowealth.com)

**Dated January 4, 2020**

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](mailto: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](http://www.adviserinfo.sec.gov) which can be found using the firm’s identification number 281923.

# Item 2: Material Changes

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Modified services and updated the fee schedule.

## 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

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## 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 advisory 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 reasonably 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 Advisory Services***

We offer **Financial Planning, and Investment Management Services**. Our financial planning involves access to all the different topics *described above* as applicable to the client. We believe financial planning is ultimately about life-planning, and our goal is to address all the areas of your life based upon an analysis of your individual needs.

We begin the relationship with a data-gathering process and then we address the different components of your financial plan in a systematic and modular fashion over several meetings. Working together, we determine what advice you'd like to implement and then we get everything in place to reach your goals.

We know that life doesn't stand still, so we ensure that we review your plans and goals regularly. The planner and client will work together to monitor the plan, identify any needed changes and ensure the plan is up to date. We utilize scheduled reviews to ensure that we are doing our part to assist you in keeping your plan up to date. The reviews will address the changes in your income, goals, assets, family size, and laws that can help you maximize your resources and minimize risks.

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 and investment plans are living documents that should be updated as frequently as needed to keep up with life changes.

### ***Retirement Plan Services***

We offer consulting and advisory services for employer-sponsored retirement plans and their fiduciaries based upon an analysis of the needs of the plan. We may also assist sponsors with enrollment and/or providing investment education to plan participants and beneficiaries. A fee may be charged for these services as described in this form ADV Part 2A.

### **Other Stand-Alone Planning or Consulting Services**

We offer consulting services that are limited in scope and primarily to address specific financial-related topics set forth in an agreement. The topics we address may include, but are not limited to, financial strategies, risk management, investment evaluation/profitability analysis, researching other relevant providers.

### ***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

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## Method of Compensation and Fee Schedule

### *Financial Planning, Consulting, Investment Management Fees:*

We provide financial plans and consulting for individuals and businesses for a fixed fee ranging from \$1500 to \$50,000 depending on the tier of service.

#### **1. Earn Into Wealth Premium**

This is our full Comprehensive Planning & Investment Management service on a flat fee basis based on the complexity of the client's financial needs and situation. Factors considered in setting the client fee include: amount of financial planning guidance/goals required, family size, number of accounts, asset types, net-worth, life-stage, business interests, real-estate ownership, etc. We do not have a minimum investment account size, instead we have minimum fees based on certain factors. Fees may be negotiable, and we reserve the right to decline situations which we consider not robust/complex enough to warrant our minimum fee. Alternatively, we may agree to negotiate a lower fee for simpler situations.

Our minimum fee is \$5700 per year for a single person. For a couple, our minimum fee is \$6900 per year. For business owners, our minimum fee is \$9600 per year.

We also charge a one-time set up fee for new clients or former clients who have been away for more than one year. The one-time set-up fee will range between \$1000 to \$5000.

The annual fee for services is billed in quarterly or monthly installments in advance based on client preference. Ongoing clients can elect to pay quarterly or monthly. Fees are generally debited via recurring ACH that the client will set up via our provided payment instructions. For clients who can afford to pay via their assets being managed, we will instruct the qualified independent custodian holding the client's funds to deduct our fee directly and remit those fees to us each quarter.

In the event of early termination, 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 based on client's complexity and needs.

#### **2. Earn Into Wealth Standard**

This package is for clients who are in year 2+ of their planning relationship who wish to downsize from the Earn Into Wealth Premium package. Clients will maintain access to all of the firm's planning tools and will have a set amount of financial planning service hours annually. We will adhere to a bi-annual meeting schedule to make updates and implement changes to the financial plan. A service calendar will be shared with the clients annually. Any additional hours incurred beyond the allotted service hours will be billed separately. Clients will be notified when a request or situational change might trigger additional service hours.

The minimum fee is \$3900 per year for a single person. For a couple, the minimum fee is \$4500 per year. For business owners, the minimum fee is \$6600 per year. Clients may use up 8 service hours (single), 10

service hours (couples), and 16 service hours (business owners). Asset management for up to the first \$250,00 is included at no additional charge from the firm, the asset-based schedule will apply for assets beyond that amount. Outside manager fees may apply.

The annual fee for services is billed quarterly or monthly in advance based on client preference. Ongoing clients can elect to pay quarterly or monthly. Fees are generally debited via recurring ACH that the client will set up via our provided payment instructions. For clients who can afford to pay via their assets being managed, we will instruct the qualified independent custodian holding the client’s funds to deduct our fee directly and remit those fees to us each quarter.

In the event of early termination, 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 based on client’s complexity and needs.

**3. Financial Clarity Session**

This is a one-time project-based package to address one or two areas of a client’s finances. The fixed fee for this service will range from \$1500 to \$5000 depending on the complexity and needs of the client. It includes behind-the-scenes analysis done by the advisor and a 90-120-minute planning session to deliver and discuss the recommendations. Each session will cost a separate fee and fees are due at the time of booking. A cancellation fee may apply once work has commenced on a project. Any work completed will be provided to the client at that time, and any unearned fees will be refunded.

**4. Investment Management Only**

For clients who wish to maintain an investment-only relationship with the firm. The asset-based schedule below will apply. There will be an annual investment meeting to review and make any desired changes to the portfolio.

**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 engagement covers. The hourly rate is \$350 to \$500 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
<b>\$0 to \$100,000</b>	\$1000 per year
<b>Over \$100,000</b>	1.00%

Please note, the above fee schedule for accounts over \$100,000 includes the outside manager's fee of 0.20%, if an outside manager is used. Accounts under \$100,000 will be invoiced the minimum fee directly. The outside manager will calculate and debit the client's account for both the outside manager's fee, and our advisory fee.

For clients on the **Earn Into Wealth Premium** package, investment management is included in the quoted flat annual fee. Any outside manager's fee will be additional and paid directly from the client's account.

For clients on the **Earn Into Wealth Standard** package, investment management is included for the first \$250,000 of assets under management. Any outside manager's fee will be additional and paid directly from the client's account. The asset-based fee schedule will begin to apply for assets that exceed \$250,000. Any additional fees billed can be used to off-set any additional comprehensive planning service fees incurred.

For clients who are on the **Investment Management-Only** package, the asset-based fee schedule will apply for any amount under management. Any outside manager's fee will be additional and paid directly from the client's account.

Accounts at \$100,000 or less will be assessed the minimum fee of \$1000 per year. This can be billed directly from the account or via manual invoice to be paid by ACH or Credit Card. Accounts with balances over \$100,000 will be billed directly from the account.

### ***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 free to \$15,000 per seminar or free to \$2000 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. In the event of inclement weather or a flight cancellation, the speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel is impossible, we will waive the speaker fee, but the client will still be responsible for any non-refundable travel expenses.

### ***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**

Fees are due as stated in your engagement agreement with our firm. 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 electronically via our payment processing providers. We do not accept cash, money orders or similar forms of payment for our engagements.

### Meeting Cancellation Fee

We may charge a meeting cancellation fee of \$150 for any meeting canceled within 48 hours of your scheduled time.

### 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 up to one-half of your engagement fee 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. Quarterly payments are due at the beginning of each quarter. 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

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We do not offer performance-based fees.

## Item 7: Types of Clients

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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. Note that clients who engaged us prior to the date of this document update may have grandfathered fees.

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

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### 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 n 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

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



# Item 10: Other Financial Industry Activities and Affiliations

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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

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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

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### **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**

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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**

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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 TD Ameritrade, Dimensional Fund Advisors, Betterment for Institutional, 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 TD Ameritrade, Dimensional Fund Advisors, Betterment Institutional, 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

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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

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For client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold.

For client accounts where we use Outside Managers for investment management, we do have discretion over the asset allocation of each account. We do not have discretion over the exact timing or number of shares of securities bought and sold in 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. Clients can impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

# Item 17: Voting Client Securities

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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

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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

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## **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](http://www.earnintowealth.com)

Dated: Jan 4, 2020

## 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](http://www.adviserinfo.sec.gov) which can be found using the identification number 5654328



# Item 2: Educational Background and Business Experience

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## 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 in order 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.

## Item 3: Disciplinary Information

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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

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

## Item 5: Additional Compensation

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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

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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

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