Brochure

Anchored Wealth Management LLC

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July 3, 2024

This Brochure provides information about the qualifications and business practices of Anchored Wealth Management LLC (<u>"Anchored Wealth.</u>," <u>"us.</u>," <u>"we</u>," or "<u>our</u>"). When we use the words "<u>you</u>," <u>"your</u>" and "<u>client</u>" we are referring to you as our client or our prospective client. We use the term "<u>supervised</u> <u>person</u>" when referring to our officers, employees, and all individuals providing investment advice on behalf of Anchored Wealth. If you have any questions about the contents of this Brochure, please contact us at 832-980-5535 or JoelD@anchoredwealthmgt.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("<u>SEC</u>") or by any state securities authority.

Anchored Wealth is a registered investment adviser. The registration of an investment adviser does not imply any level of skill or training. The oral and written communications made to you by Anchored Wealth, including the information contained in this Brochure, should provide you with information to determine whether to hire or retain Anchored Wealth as your adviser.

Additional information about Anchored Wealth also is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>. The SEC's website also provides information about any persons affiliated or registered with, and or required to be registered, as investment adviser representatives of Anchored Wealth.

Item 2 - Material Changes

This Brochure reflects the current advisory activities of Anchored Wealth as of May 31, 2021, and is posted on the SEC's public disclosure website ("IAPD") at www.adviserinfo.sec.gov.

In the future we will provide new clients with a Brochure before or at the time we enter into an advisory agreement. In the future, we will deliver to our clients, within 120 days of the end of each fiscal year, a free, updated Brochure that either includes or is accompanied by a summary of material changes. Alternatively, we may deliver a summary of material changes that includes an offer to provide a copy of the updated Brochure and information on how our clients may obtain the Brochure.

Currently, our Brochure may be requested by contacting Joel Diaz, Managing Member and Chief Compliance Officer at 832-980-5535.

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Brochure Supplement

Item 4 – Advisory Business

Ownership

Anchored Wealth is located in The Woodlands, Texas and is owned by Joel Diaz. The Managing Member of Anchored Wealth is Joel Diaz.

Services Offered

Anchored Wealth offers the following advisory services:

- Portfolio management services for individuals and/or small businesses
- Portfolio management for businesses or institutional clients (other than investment companies)
- Financial planning services
- Selection of other advisers

This selection of specific securities will provide proper diversification and help to meet the client's stated investment objectives, although you may impose restrictions on us with respect to investing in certain securities or types and classes of securities.

Investment Products

Anchored Wealth may offer advice on the following as well as the foreign equivalents of the following investment products:

- Equity securities (exchange-listed, over the counter, foreign issuers) Municipal securities.
- Investment Company Securities (mutual fund shares).

Assets Under Management

As of the date of this Brochure, Anchored Wealth has no assets under management.

Wrap Programs

Anchored Wealth does not participate in any wrap fee programs.

Overview of Services Offered

Anchored Wealth has been in business since April 30, 2024. We provide advisory services by providing discretionary investment advisory and consulting services. Investment advice and portfolio management services are provided on a continuing basis including the appropriate allocation of managed assets among cash, stocks, mutual funds and bonds. This selection of specific securities will provide proper diversification and help to meet the client's stated investment objectives, although you may impose restrictions on us with respect to investing in

certain securities or types and classes of securities. These portfolio management services include the following services:

Portfolio and Wealth Management Services

Anchored Wealth manages client investment portfolios on a discretionary and nondiscretionary basis. In addition, we provide clients with wealth management services that include a broad range of comprehensive financial planning services in addition to the discretionary management of investment portfolios. Anchored Wealth tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. We consult with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios.

Clients are advised to promptly notify us if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients may impose reasonable restrictions or mandates on the management of their accounts if we determine, in our sole discretion, the conditions will not materially impact the performance of a management strategy or prove overly burdensome to our management efforts.

Financial Planning

We provide fee-based comprehensive financial planning services tailored to the needs of the individual client. Items generally covered are assets and liabilities, budgeting, cash flow analysis, income taxation, insurance coverage, risk management, retirement planning, education expenses, estate planning, client's investment attitudes, risk tolerance, and philosophy. The financial plan also includes Anchored Wealth's recommendations as to investment of funds.

After discussions with the client and analysis of all data gathered, the firm provides a written review of the client's financial situation together with recommendations as to how to pursue an investment strategy consistent with the client's financial goals, objectives, and risk tolerances. The plan may consider issues such as the effects on income, investment, tax deferred investments, appropriate levels of cash reserves for contingencies, and other relevant issues.

Portfolio Management within 529 Plans:

Anchored Wealth will assist with portfolio management within 529 Plans. Our portfolio management services within these products are limited to the initial selection and ongoing reallocation of the available investments. 529 Plan Investments are treated differently than other investments for tax purposes, and clients should review the features and associated costs of a plan prior to purchase. Portfolio Management within 529 Plans are otherwise similar to our standard Portfolio Management Services.

Third-Party Investment Advisors Services

Anchored Wealth utilizes the services of third-party investment advisors as sub-advisors on occasion. If we choose this option, we will select a third-party investment advisor whose style and talent best fit your individual needs and objectives. Your agreement with us gives us the authority to hire or fire these managers on your behalf. Once a third-party investment advisor is selected, we will continue to monitor their performance. If our services to you include the use of these third-party investment advisors, you will typically sign an agreement with them in addition to the advisory agreement you will sign with Anchored Wealth. If you are interested in learning more about any of these third-party investment advisors and their services, a complete description of their programs, services, fees, payment structure and termination features are found in their service disclosure brochures, investment advisory contracts, and account opening documents. Our advisory responsibility is to select and monitor any third-party investment advisor that provides services to us. Factors that we consider in their selection may include:

- Their size.
- How long they have been in business.
- The experience level and turnover of their portfolio managers.
- A review of their historical performance and risk measurements.
- A review of their disclosure documents.

In deciding to use a third-party investment adviser to manage your assets, we consider your risk tolerance, goals, objectives, time horizons, and general financial situation. We also consider your level of investment experience and the assets you have available for investment. If you were to go to these third-party investment advisors on your own, the fees they charge you may be more or less than going through us. However, when using their services directly, you will not receive our expertise in developing an investment strategy, selecting the third-party investment advisors to use, monitoring the performance of your account, and changing third-party investment advisors if needed.

Education

All personnel of Anchored Wealth are expected to have education and business backgrounds that enable them to perform their respective responsibilities effectively. In assigning responsibilities, we consider academic background (including studies in college and graduate schools, as well as degrees earned), industry training, licenses and certifications. Work experience in a related field, such as investments, commodities, insurance, banking or accounting, is also considered. No formal, specific standards have been set, but appropriate education and experience are required. See ADV Form Part 2B for additional information.

Item 5 – Fees and Compensation

Type of Compensation

Based on the investment services provided Anchored Wealth is compensated by the following means:

- A percentage of assets under management
- Hourly charges

Our fees are negotiated directly with you. Such fees are dependent on various factors, including but not limited to, the account/household size, the specific type of service that you engage us for, the securities utilized, and the investment strategy employed. You will be charged a certain percentage of assets under management but, in no event will our fees exceed 1.00% on an annualized basis. All fees are subject to negotiation. The amounts and specific manner in which fees are charged is negotiated and memorialized in Anchored Wealth's contract with our clients, and we generally bill our fees on a monthly basis, in arrears. The valuation of securities and other instruments are generally determined by their last reported sale price on the principal market in which they are traded, if traded on a market for which transaction prices are publicly reported. Otherwise, other readily marketable securities and instruments are valued by using a pricing service or by Anchored Wealth determining a fair market value. Although many fees are individually negotiated, some common fees are included on our fee schedule for your review and described further below:

Annualized

FEE SCHEDULE – EQUITY OR BLENDED: Net Asset Value (Household Accounts)

	Fee
First \$1 Million	1.00%
Next \$1 Million	0.90%
Next \$3 Million	0.80%
Next \$5 Million	0.70%
Next \$15 Million	0.60%
Next \$75,000,000	0.50%
Over \$100,000,000	Negotiable

FEE SCHEDULE – CASH, CASH EQUIVALENTS, U.S. TREASURIES:Net Asset Value (Household Accounts)Annualized

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Fee	
0.50%	
0.40%	
0.30%	
Negotiable	

Portfolio Management Advisory Fees are computed as a percentage of the net asset value of the assets under management in the account on the last day of the month for the previous month including any margin debt in the account.

Anchored Wealth will generally bill its fees on a monthly basis in arrears on the 15th of the following month. Clients generally authorize us to directly debit fees from their accounts. In the event that client's balances in money market account are insufficient to pay management fees, client authorizes Anchored Wealth to liquidate securities in the account. Other clients may opt to have Anchored Wealth invoice them for the management fee, and they may pay by credit card, check or Zelle in which case the management fee will be payable upon receipt of the invoice.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Valuation

The valuation of securities and other instruments are generally determined by their last reported sale price on the principal market in which they are traded, if traded on a market for which transaction prices are publicly reported. Otherwise, other readily marketable securities and instruments are valued by using a pricing service or by other equitable means consistent with the fiduciary duty of the money manager to determine a fair market value.

Transaction Costs

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. See also "*Brokerage Practices and Referral Arrangements and Other Compensation*" for a description of additional compensation received by Anchored Wealth and for a description of factors that Anchored Wealth considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

See also "Other Financial Industry Activities and Affiliation, Brokerage Practices and Client *Referrals and Other Compensation*" below for a description of additional compensation received by Anchored Wealth, a description of factors that Anchored Wealth considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions), and potential conflicts of interests related to certain affiliations.

Financial Planning Services

The cost of your financial plan depends on the hourly rate of the Anchored Wealth employees that are working on your plan. Maximum hourly rate: \$400; payable in stages as the work progresses by check, credit card or Zelle within ten (10) days of receipt of each invoice. There is a minimum one-hour charge for all work billed hourly. An initial deposit may be required.

If you are part of a group such as a corporation, rates may be negotiable. The fee is due when we present members of your group with the final plan, in written or electronic form.

Mutual Funds

To the extent mutual funds are selected to fill components of the overall investment strategy, the advisory fee and performance fee does not include the customary fees and expenses associated with investing in mutual funds or other costs of establishing and maintaining an account with mutual funds including Rule 12b-1 fees and expenses.

Clients are advised that in addition to Anchored Wealth's annual advisory fee, the mutual funds pay an advisory fee to the funds' portfolio managers. Fees may vary from client to client due to

the particular circumstances of the client, additional or differing levels of servicing, or as otherwise contractually agreed upon with specific clients.

Termination

The relationship between parties may be terminated by either party upon 30 days' written notice. Notwithstanding the above, if the appropriate disclosure statement was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory agreement with this investment adviser, then the client has the right to terminate the relationship, without penalty, within five (5) business days after entering into the agreement. If the relationship is terminated in the middle of a month the client will be charged a fee prorated through the date of termination.

If client terminates the relationship under the Financial Planning Agreement, client agrees to compensate Anchored Wealth at Anchored Wealth' normal hourly rates, as set forth herein, for time actually spent on client's behalf. Client also agrees to reimburse Anchored Wealth for all out-of-pocket expenses incurred on client's behalf. Any excess fee payments paid by client to Anchored Wealth will be promptly returned to client by Anchored Wealth. Anchored Wealth retains the right, for any reason, to terminate Anchored Wealth's service to client and if such occurs shall refund any monies paid to Anchored Wealth by client and as yet unearned. If such cancellation of this Agreement should occur after within the first five days after Client signs this Agreement, client will receive a complete refund of any fee paid.

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

Anchored Wealth does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) and or engage in side-by-side management.

Item 7 – Types of Clients

We offer portfolio management investment advice to the following types of clients:

- Individuals.
- Families.
- High net worth individuals.
- High net worth families.
- Charitable organizations.
- Trusts.
- Estates.
- Private business owners.
- Corporations.

Account Minimum Requirements

Anchored Wealth does not require a minimum investment for the management of accounts, but reserves the right to make exceptions on a case-by-case basis.

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

Anchored Wealth uses and implements the Modern Portfolio Theory extensively. When making recommendations, Anchored Wealth customizes portfolio recommendations taking various factors in consideration such as the client's investment goals & objectives, risk tolerance, time horizon and expectations of income. Investing in securities involves risk of loss that clients should be prepared to bear.

Analysis Methods

Security analysis methods utilized by Anchored Wealth include the following:

Charting

Charting analysis seeks to identify resistance and support reference prices for decisions to buy (price hits the support) or sell (price hits the resistance). Through charting, the analysis seeks to identify price patterns and market trends in financial markets. Charting may apply to longterm investing or be used as a market-timing strategy, depending on the time-frame of the price charts. However, while the charting of market variables, especially of stock prices and market variables, such as commodity prices, interest rates and trading volume are helpful, it is utilized in conjunction with both fundamental and technical analysis discussed below.

Fundamental

Fundamental analysis maintains that markets may misprice a security in the short run, but that the correct price will eventually be reached by the market. The fundamental analysis of a business involves analyzing a businesses: financial statements and health, management and competitive advantages, and competitors and markets. When applied to futures and forex, it focuses on the overall state of the economy, interest rates, production, earnings, and management. Fundamental analysis tends to focus on a smaller number of stocks, but will focus on their non-quantifiable return drivers. As a result, where fundamental analysis is used solely, it tends to result in less diversification, and the fact that certain market anomalies or themes may be better captured across a larger sample size of stocks. Notwithstanding these risks, the use of fundamental analysis mitigates those risks through the utilization of a deeper, fundamental research, such as insights about leadership gained from company meetings.

Technical

Technical analysis maintains that all information is already reflected in the stock price. Technical analysis is a discipline for forecasting the direction of prices through the study of past market data, primarily price and volume. Generally, technical analysis employs models and trading rules based on price and volume transformations, such as the relative strength index, moving averages, regressions, inter-market and intra-market price correlations, business cycles, stock market cycles or, classically, through recognition of chart patterns. However, while technical analysis operates from the assumption that past trading activity and price changes of a security can be valuable indicators of the security's future price movements when paired with appropriate investing or trading rules, a fundamental risk of technical analysis of that past performance is not indicative of future performance. However, this risk is mitigated by the blending of our investment analysis.

Cyclical

Cyclical analysis generally targets cyclical stocks for purchase of equity securities when the ratio of price-to-earnings (P/E Ratio) is low, and sell them when the P/E Ratio is high (i.e., when earnings are peaking). The P/E Ratio is a measure of the price paid for a share relative to the annual net income or profit earned by the firm per share. Thus, cyclical analysis focuses on investing into sectors of the economy according to the stage of the economic growth cycle. During recessions or times of slow growth, more conservative investments are appropriate, while the reverse is true in time of fast economic growth. A risk associated with the utilization of this method of analysis alone is that indicators may be missed with respect to changes in the economy, whereby the timing of shifts in the invested portfolio misses changes in the economy. We mitigate that risk through the blending of our investment analysis.

Sources of Information

The main sources of information that Anchored Wealth uses to analyze these investment strategies is:

- Financial newspapers and magazines.
- Annual reports, prospectuses, filings with the SEC.
- Press releases of companies.
- Other sources of information that we may use include the internet.

Investment Strategies

The investment strategies Anchored Wealth uses to implement any investment advice given to clients includes the following:

- Long term Purchases (securities held at least a year).
- Short term purchases (securities sold within a year).
- Trading (securities sold within 30 days).

Investment Strategy Risks

Investing in securities involves risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. Our investment approach seeks to keep the risk of loss in mind. Investors face the following investment risks:

General Risks

Lack of Diversification: Portfolio investments may be concentrated, and diversification may be limited. There are no limits with respect to position sizes. Any assets or combination of assets that can be held in a securities account can be purchased or sold.

Cash and Cash Equivalents: Accounts may maintain significant cash positions from time to time and the client will pay the Investment Management Fee based on the net asset value of the Account, including cash and cash equivalents. Furthermore, the Account may forego

investment opportunities to hold cash positions if we consider it in the best interests of the Accounts.

Interest Rate Fluctuation: The prices of securities in which the Advisor may invest are sensitive to interest rate fluctuations and unexpected fluctuations in interest rates could cause the corresponding prices of the long and short portions of a position to move in directions which were not initially anticipated. In addition, interest rate increases generally will increase the interest carrying costs of borrowed securities and leveraged investments.

Long term Purchases (securities held at least a year)

Liquidity: The portfolio may be invested in liquid and illiquid securities. You should be aware that liquid securities may become less liquid during the holding period.

Short term purchases (securities sold within a year)

Market Risks: The success of a significant portion of the program will depend, to a great extent, upon correctly assessing the future course of the price movements of the securities traded. There can be no assurance that the trading program will be able to predict accurately these price movements. Additionally, over time, the effectiveness of the trading program may decline, including due to other market participants developing similar programs or techniques.

Trading (securities sold within 30 days)

Market Risks: The success of a significant portion of a trading program will depend, to a great extent, upon correctly assessing the future course of the price movements of the securities traded. There can be no assurance that the trading program will be able to predict accurately these price movements. Additionally, over time, the effectiveness of the trading program may decline for many reasons, including other market participants developing similar programs or techniques.

Investments in a Concentrated Number of Securities or in Only One Industry Sector (*or in Only a Few Sectors:* When strategies invest in a concentrated number of securities, a decline in the value of these securities would cause your overall account value to decline to a greater degree than that of a less concentrated portfolio. Strategies that invest a large percentage of assets in only one industry sector (or in only a few sectors) are more vulnerable to price fluctuation than strategies that diversify among a broad range of sectors.

Trading is Speculative: There are risks involved in trading securities. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of governmental intervention may be particularly significant at certain times in the financial instrument markets and such intervention (as well as other factors) may cause these markets to move rapidly.

Turnover: Our trading activities may be made on the basis of short-term market considerations. The portfolio turnover rate could be significant, potentially involving substantial brokerage commissions, and related transactional fees and expenses.

Margin Risk

Leverage: We may use leverage in investing. Such leverage may be obtained through various means. The use of short-term margin borrowings may result in certain additional risks to Accounts. For example, should the securities pledged to a broker to secure a margin account decline in value, a margin call may be issued pursuant to which additional funds would be required to be deposited with the broker or the broker would affect a mandatory liquidation of the pledged securities to compensate for the decline in value. We might not be able to liquidate assets quickly enough to pay off the margin debt and the Accounts may therefore also suffer additional significant losses as a result of such default. Although borrowing money increases returns if returns on the incremental investments purchased with the borrowed accounts exceed the borrowing costs for such accounts, the use of leverage decreases returns if returns earned on such incremental investments are less than the costs of such borrowings.

Other Investment Risks

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains, in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("<u>NAV</u>"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid

secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Information Security Risk.

Clients may be susceptible to risks to the confidentiality and security of Anchored Wealth's operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisors. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability for us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

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 Anchored Wealth or the integrity of Anchored Wealth's management.

Anchored Wealth has no information which is applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

We are not currently engaged in any business activities other than giving financial and investment advice. Additionally, we have no material arrangements or affiliations with any investment company, financial planning firm, banking institution, thrift institution, accounting firm, law firm, insurance agency, pension consultant, real estate broker, or any other organization or entity that has not been disclosed in this brochure.

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

General

Anchored Wealth has adopted a Code of Ethics for all of our supervised persons describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Anchored Wealth must acknowledge the terms of the Code of Ethics annually, or as amended.

Anchored Wealth anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which we have management authority to

effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Anchored Wealth, its affiliates and/or clients, directly or indirectly, have a position of interest. Our employees and persons associated with us are required to follow our Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Anchored Wealth and its affiliates are allowed to trade for their own accounts in securities which are recommended to and/or purchased for our clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Anchored Wealth will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code of Ethics certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of our clients. In addition, the Code of Ethics requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Anchored Wealth and its clients.

Personal Trading

Anchored Wealth and our related persons are allowed to purchase and sell securities for their own account. To prevent conflicts of interest, all employees of Anchored Wealth must comply with our Code of Ethics, which imposes restrictions on the purchase or sale of securities for their own accounts and the accounts of certain affiliated persons.,

Certain affiliated accounts are allowed to trade in the same securities with client accounts on an aggregated basis when consistent with our obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Anchored Wealth's clients or prospective clients may request a copy of our Code of Ethics by contacting Joel Diaz.

Cross Trades

It is Anchored Wealth's policy that we will not affect any principal or agency cross securities transactions for client accounts. We will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a

transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Insider Information

Further, the Code of Ethics and our Compliance Manual impose certain policies and procedures concerning the misuse of material non-public information that are designed to prevent insider trading by any officer, partner, or supervised person of Anchored Wealth.

Item 12 – Brokerage Practices

General

Anchored Wealth offers the brokerage services of Charles Schwab ("<u>Schwab</u>") to its clients, but our clients are not required to utilize the services of Schwab, or direct their money manager to execute transactions through Schwab. Furthermore, the client's money managers have discretion to use Schwab or any other broker dealer depending on where the manager gets best execution.

Best Execution

Transaction rates for trades executed through Anchored Wealth may not always be as favorable as those that could be obtained if transactions were executed through another broker-dealer. In selecting such other broker-dealers, Anchored Wealth shall consider the available prices and rates of brokerage commissions and other relevant factors (including, but not limited to, execution capabilities, research and other services provided by such brokers/dealers that are expected to enhance the general portfolio and management capabilities of Anchored Wealth, and the value of any ongoing relationship between Anchored Wealth and such brokers/dealers), without having to demonstrate that such factors directly benefit Client.

Directed Brokerage

If requested by the client, Anchored Wealth will place all or a portion of the transactions with a broker with whom the client has a special advisory or consulting relationship. Such transactions are placed with a broker who may have provided manager selection services, performance measurement services, asset allocation services, or a variety of other consulting or monitoring assistance, all with the specific knowledge and full approval of the client.

Anchored Wealth does not maintain agreements with referring brokers regarding our internal allocation of brokerage transactions. However, all or a sizable portion of a particular clients' brokerage transaction business will be directed to a particular broker if the client has directed, agreed or stipulated us to do so. Commissions are not intended to compensate brokers for client referrals.

With regard to client directed brokerage, we are required to disclose that they may be unable to negotiate commissions, block or batch client orders or otherwise achieve the benefits described above, including best execution, if you limit our brokerage discretion. Directed brokerage

commission rates may be higher than the rates Anchored Wealth might pay for transactions in non-directed accounts.

Also, clients that restrict our brokerage discretion can be disadvantaged in obtaining allocations of new issues of securities that we purchase or recommend for purchase in other clients' accounts. It is our policy that such accounts do not participate in allocations of new issues of securities obtained through brokers and dealers other than those designated by the client. As a general rule, we encourage each client to compare the possible costs or disadvantages of directed brokerage against the value of the custodial or other services provided by the broker to the client in exchange for the directed broker designation.

Trade Aggregation

When Anchored Wealth trades the same security in more than one client account, we generally attempt to batch or bunch the trades in order to create a block transaction. Generally, buying and selling in blocks helps create trading efficiencies, prompt attention and desired price execution. We will place all or substantially all transactions to purchase or sell common stocks with the client's "directed" broker, when applicable. (See the discussion entitled, "*Directed Brokerage*") Whenever possible, we will attempt to batch or aggregate trades for clients who use the same directed brokers in order to create a "block transaction." The commission amount and per share commission rate will differ between our clients with directed brokerage relationships due to the dollar value and the size (number of shares) of the trade for each account, and the total relationship between the client and their broker. Because each client differs in portfolio size, investment objective, equity exposure and the extent of the relationship with their broker, we do not negotiate commission discounts on the block transaction itself.

Soft Dollar Arrangements

Anchored Wealth does not engage in any soft dollar arrangements. However, Schwab makes available to Anchored Wealth other products and services that benefit Anchored Wealth but may not benefit its client's accounts. Some of these other products and services assist Anchored Wealth in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of Anchored Wealth's fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting.

Item 13 – Review of Accounts

Account Review

Joel Diaz will review all accounts on a quarterly basis and compare each investment on a transaction basis to insure that each transaction is: (i) suitable to the respective client's investment objectives; (ii) meets that client's quality standards; and (iii) to make sure that their investment objectives are still pertinent to the managed account arrangement. More frequent

reviews cam be triggered by material changes in variables such as the client's individual circumstances or the market economic or political environment.

Reports

The clients receive brokerage transaction confirmations and monthly statements from the custodian of the account.

Trade Errors

In the event of a trade error in your account, our policy is to attempt to correct trading errors as soon as they are discovered; however, the Firm is not responsible for execution or trading errors committed by the brokers with which it transacts, unless such errors resulted from Anchored Wealth's negligence, fraud or willful misconduct. Notwithstanding the above, based on the circumstances, corrective actions generally include:

- canceling the trade.
- adjusting an allocation, and/or
- reimbursement to the account.

Item 14 – Client Referrals and Other Compensation

Client Referrals

Anchored Wealth does not utilize or pay third party solicitors for the referral of advisory clients to us.

Item 15 – Custody

Custody Overview

Custody Rule

The Custody Rule provides that it is a fraudulent, deceptive or manipulative act, practice or course of business within the meaning of Section 206(4) of the Advisers Act for an investment adviser that is registered or required to be registered under the Advisers Act to have custody of client funds or securities unless they are maintained in accordance with the requirements of the rule. In this regard, where an investment adviser has custody of client funds or securities, it must obtain a surprise examination of client assets by an independent public accountant registered with the Public Company Accounting Oversight Board. ("<u>PCAOB</u>").

Supervision/Affiliation with Custodian

Schwab is a qualified custodian, and provides custodial services to clients of Anchored Wealth. Anchored Wealth is not affiliated to Schwab, and Schwab does not supervise Anchored Wealth, its agents or activities.

Invoicing

Anchored Wealth is deemed to have custody of the funds and securities as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee. However, a surprise examination is not required because Anchored Wealth has written authorization from each client to deduct advisory fees from the account held with the qualified custodian and each time a fee is directly deducted from a client account, we concurrently: (i). sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and (ii). Schwab sends the client an invoice or statement itemizing the fee.

Item 16 – Investment Discretion

Discretionary Authority

We usually receive discretionary authority from you at the outset of an advisory relationship. That discretionary authority allows us to make determinations regarding the securities that are to be bought and sold, as well as the quantities of such securities.

Documentation of Discretion

Discretionary authority is provided in our contract with each client. Additionally, we maintain a Limited Power of Attorney for all our discretionary accounts for the purpose of directing and or effecting investments, for the direct payment of fees and or the payment of commissions, custodial fees and or other charges incurred by the managed account.

Discretionary Management

In all cases, however, such our discretion is to be exercised in a manner consistent with the stated investment objectives for the particular account. Thus, when selecting securities and determining amounts, we observe the investment policies, limitations and restrictions of the clients for which it advises. Additionally, in many cases, the discretion is subject to mutually agreed upon investment guidelines relative to the client's portfolio. Investment guidelines and restrictions must be provided to Anchored Wealth in writing.

We have model portfolio guidelines available for clients to adopt, in whole or in part, if they do not have their own. Client investment guidelines may or may not limit the scope of potential investments. As a result, clients can impose restrictions on investing in certain securities or types of securities. Within client guidelines and instructions, our Management Team (described above) makes decisions as to the nature and quantity of securities to be bought or sold. Investment guidelines and restrictions must be provided to us in writing.

Item 17 – Voting Client Securities

As a matter of our policy and practice, Anchored Wealth does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

Item 18 – Financial Information

We are required to provide you with certain financial information or disclosures about financial condition which would impede our ability to provide the advisory services described herein. Anchored Wealth has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Anchored Wealth

Joel Diaz was born in 19<u>71</u>, and is the sole Managing Member and CCO of Anchored Wealth, LLC. Joel Diaz graduated in 2013_ from Texas A&M University with an Executive Master of Business Administration ("<u>M.B.A.</u>") He also received his Bachelor of International Business ("<u>B.B.A.</u>") degree from Sam Houston State University in 1999.

Anchored Wealth is not engaged in any other services that have not already been disclosed.

In addition to the information provided herein by Anchored Wealth on its advisory business, officers and management, and other business activities, Anchored Wealth is required to disclose all material facts regarding whether we or a management person of ours has: (a) an award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following: (i) an investment or an investment-related business or activity; (ii) fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; (iii) bribery, forgery, counterfeiting, or extortion; or (iv) dishonest, unfair, or unethical practices; (b) an award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: (i) an investment(s), or omissions; their metated business or activity; (ii) fraud, false statement(s), or omission; (ii) an investment or an investment related business or activity; (ii) fraud, false statement(s), or omissions; (ii) an investment or an investment related business or activity; (ii) fraud, false statement(s), or omissions; (iii) theft, embezzlement, other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or (iv) dishonest, unfair, or unethical practices; or (c) a relationship or arrangement that with any issuer of securities that is not listed in herein.

Anchored Wealth has no additional information which is applicable to this item.

Principal Executive Officers and Management Persons

Joel A. Diaz, Managing Member

For information on the Educational Background and Business Experience of Joel A. Diaz ("<u>Mr. Diaz</u>," "<u>Joel</u>," "<u>he</u>," "<u>his</u>," or "<u>him</u>") see below and or the Brochure Supplement, Form ADV Part 2B for Joel A. Diaz, which is attached hereto and incorporated herein.

Other Business Activities

Our investment professionals do not engage in other business activities.

Legal and Disciplinary Issues

In addition to the information provided herein by Anchored Wealth on its advisory business, officers and management, and other business activities, we are required to disclose all material facts regarding whether we or a management person of ours has:

• An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving: (i) an investment or an investment-related business or activity; (ii) fraud, false statement(s), or omissions; (iii) theft, embezzlement, or other

wrongful taking of property; (iv) bribery, forgery, counterfeiting, or extortion; or (v) dishonest, unfair, or unethical practices.

• An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: (i) an investment or an investment-related business or activity; (ii) fraud, false statement(s), or omissions; (iii) theft, embezzlement, or other wrongful taking of property; (iv) bribery, forgery, counterfeiting, or extortion; or (v) dishonest, unfair, or unethical practices.

We have no other material facts or information regarding any legal or disciplinary events with respect to our advisory activities; including those items set forth above.

Item 20 – Other Information

Privacy Notice to Customers

At Anchored Wealth, we do not disclose nonpublic personal information about our individual clients or former clients except as permitted by law. We restrict access to nonpublic personal information about you (that we may obtain from your account and your transactions) to those employees who need to know that information to provide products or services to you or to alert you to new, enhanced or improved products or services we provide. We maintain physical, electronic and procedural safeguards that comply with federal standards to safeguard your nonpublic personal information.

Business Continuity Plan

Anchored Wealth has developed a Business Continuity Plan to address how we will respond to events that may disrupt its business. Since timing and impact of disasters is unpredictable, we will have to be flexible in responding to the events as they occur. This plan is designed to permit us to resume operations as quickly as possible, given the scope and severity of the significant business disruption. The Business Continuity Plan covers data backup and recovery, mission critical systems financial and operational assessments, alternative communications, alternate business locations, bank and counter-party impact, regulatory reporting and the assurance of prompt access to funds and securities for our customers.

Varying Disruptions – Significant business disruptions can vary in their scope, such as emergencies affecting only a single building housing Anchored Wealth, the business district where we are located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only us or a building housing us, we will transfer our operations to an emergency-ready local site, moving a select group of trained employees and expecting to recover and resume business within four hours. In a disruption affecting our business district, city, or region, we will move appropriate staff to a site outside of the affected area to be able to communicate with Schwab on behalf of our clients. In either situation, we plan to continue in business, transferring operations to our clearing firm, if necessary.

If you have questions about our Business Continuity Plan, please feel free to contact us.

Joel A. Diaz

CRD #4177508

Anchored Wealth Management LLC

2002 Timberloch Place, Suite 200 The Woodlands, Texas 77380 832-980-5535

July 3, 2024

This Brochure Supplement provides information about Joel A. Diaz ("<u>Joel A. Diaz</u>," "<u>Mr. Diaz</u>," "<u>his/</u>," <u>or "he</u>") that supplements the Brochure of Anchored Wealth Management LLC ("<u>Anchored Wealth</u>," "<u>firm</u>," "<u>our</u>" or "<u>we</u>"). When we use the words "<u>you</u>," "<u>your</u>," and "<u>client</u>" we are referring to you as our client or our prospective client. You should have received a copy of the Brochure. Please contact us at 832-980-5535 or <u>JoelD@anchoredwealthmgt.com</u> if you did not receive Anchored Wealth's Brochure or if you have any questions about the contents of this supplement.

Additional information about Joel A. Diaz is available on the Securities and Exchange Commission's ("<u>SEC</u>") website at <u>www.adviserinfo.sec.gov</u>.

Educational Background and Business Experience

Joel A. Diaz was born in 1971.

His Educational Background

He received an M.B.A., from Texas A&M University in 2013. He received a B.B.A., International Business from Sam Houston State University in 1999. He also attended the United States Navy Senior Enlisted Academy in 2015

His Business Experience for the prior 5 years includes:

04/2024 - Present Anchored Wealth Management LLC, aka Anchored Wealth, Managing Member/Chief Compliance Officer

08/2022 to 05/2024	First Horizon Private Banking, SVP, Relationship Manager and
	Group Leader
01/2013 to 08/2022	Capital One Bank, SVP, Director of Wealth Management &
	Private Banking, Senior Private Banker, Wealth Management
	Specialist

Disciplinary Information

There is no material information or facts regarding any legal or disciplinary events that would be material to your evaluation of Joel Diaz's integrity, or the investment advisory services provided by Mr. Diaz through us.

Other Business Activities

Insurance Agency Activities

Mr. Diaz is a licensed insurance agent through in the state of Texas. Mr. Diaz spends approximately 1% of his time offering insurance products on a commission basis with Texas Group One.

Other Activities

Mr. Diaz is President of TSD Capital, LLC. TSD Capital, LLC is primarily an asset holding company in which Mr. Diaz's duties include submitting franchise/ownership annual reports. TSD Capital, LLC owns real estate and interest in Ballroom Dance Company, LLC, DBA Motion Dance Center; an interest in KenDura LLC which owns farming equipment, and an interest in Xavier Education Academy.

Additional Compensation

Joel A. Diaz does not receive additional compensation from any third-party for providing investment advisory services.

Supervision

Joel A. Diaz is the Managing Member and Chief Compliance Officer of Anchored Wealth; therefore, he is responsible for his own supervision.

Additionally, Anchored Wealth maintains policies and procedures and a code of ethics to guide the supervision of our advisory activities.

Requirements for State-Registered Advisers

Registered investment advisers are required to disclose all material facts regarding:

• An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following: (a) an investment or an

investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

- An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.
- If the supervised person has been the subject of a bankruptcy petition.

Joel A. Diaz has not been subject to any of the items set forth above.

Additionally, Mr. Diaz has not been subject to a bankruptcy petition, involved in any civil, selfregulatory organization, or administrative proceeding involving an investment or investmentrelated business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices.