

# DISCLOSURE BROCHURE

Part 2A of Form ADV: Firm Brochure

## ASSET WISE ANALYTICS

a division of

MINT

ASSET MANAGEMENT

Firm IARD/CRD #: 315568

**Mint Asset Management LLC**

REGISTERED INVESTMENT ADVISOR

This Disclosure Brochure provides information about the qualifications and business practices of Mint Asset Management LLC, which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure - our contact information is listed to the right. Additional information about Mint Asset Management LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment advisor" is not intended to imply that Mint Asset Management LLC has attained a certain level of skill or training.

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BROCHURE  
DATED

**20  
DECEMBER  
2024**

**MATERIAL CHANGES**

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The following is a summary of changes made to this Disclosure Brochure (Form ADV Part 2A) since the last filing dated October 1, 2024:

- ❖ Item 11 (Code of Ethics, Participation or Interest in Client Transactions & Personal Trading) and Item 12 (Brokerage Practices) were updated to clarify Mint's trade aggregation policy.

ITEM 3

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## ITEM 4

## ADVISORY BUSINESS

## Who We Are

Mint Asset Management LLC<sup>1</sup> (hereinafter referred to as “Mint,” “the Company,” “we,” “us,” and “our”) is a Delaware Limited Liability Company and registered investment advisor<sup>2</sup> since February 2022. The Company is committed to helping you, our client, achieve your financial goals. Mint provides investment advisory services through two divisions, each of which offers different investment management strategies. Although neither division is a separate legal entity, their investment management strategies are managed autonomously by an investment advisor representative of Mint, who will serve as your primary advisor and relationship manager.

This Brochure provides information about the advisory services offered by **Asset Wise Analytics**, a division of Mint. Information about Mint’s other division is provided in a separate brochure and is available upon request. While different investment management strategies are provided through each separately branded division, back-office support, such as marketing, operations, and compliance, is performed on a company-wide basis.

## Owners

The following persons are principal owners and/or control persons of Mint Asset Management, LLC:

Name	Title	CRD#
Steven Fishman	Managing Member, Chief Compliance Officer	2428781
Jeff Greenberg Publishing, Inc.	Member	N/A
Jeffrey G. Greenberg	Chief Marketing Officer	7402940

## Mission

We strive to help you achieve your monetary goals for today’s needs and for tomorrow’s expectations by providing comprehensive money management solutions.

## Assets Under Management

As of June 30, 2024, Mint’s assets under management on a company-wide basis totaled:

Discretionary Accounts ..... \$43,864,045

## What We Do

**We manage wealth.** We provide investment management solutions designed to maximize your wealth, meet your income needs, and minimize risk. We will do our best to keep you focused on where you want to go, offer advice on how to get there, and remind you of the importance of

<sup>1</sup> Mint Asset Management LLC and its investment adviser representatives are a **fiduciaries**, as defined within the meaning of the Employer Retirement Income Security Act of 1974 (“ERISA”) and/or as defined under the Internal Revenue Code of 1986 (the “Code”) for any asset management services provided to a client who is: (i) a plan participant or beneficiary of a retirement plan subject to ERISA or as described under the Code; or, (ii) the beneficial owner of an Individual Retirement Account (“IRA”).

<sup>2</sup> The term “registered investment advisor” is not intended to imply that Mint Asset Management LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are “registered” as a licensed “investment advisor” with the United States Securities & Exchange Commission (the “SEC”) - and “Notice Filed” with State Regulatory Agencies that have limited regulatory jurisdiction over our business practices..

maintaining a disciplined investment approach to realize your investment goals. Our services include:

### Portfolio Management Services

Striving to achieve the best return on your investment capital, **Asset Wise Analytics** focuses its portfolio management services on designing and managing a portfolio tailored to your investment goals, risk tolerance, and income needs using a mix of investment strategies and asset classes, including but not limited to mutual funds, exchange-traded funds (“ETFs”), cash, and cash equivalents. We may also use individual stocks, bonds, and other securities and investment instruments to meet your needs.

Information regarding our management fee structure is disclosed under “Portfolio Management Fee” in Item 5, “Fees & Compensation,” and further description of our investment strategies under Item 8, “Methods of Analysis, Investment Strategies & Risk of Loss.”

## ITEM 5

### FEES & COMPENSATION

#### Portfolio Management Fee

Portfolio management services under Asset Wise Analytics are provided on an asset-based fee arrangement. Management fees are calculated based on the average daily balance<sup>3</sup> of your account for each day in the previous calendar month multiplied by one-twelfth of the corresponding annual percentage rate.

We retain discretion to negotiate, waive, or reduce the management fee within each tier on a client-by-client basis, depending on the size, complexity, and nature of the portfolio managed. Therefore, some clients may pay different fees for the same level of services provided by us.

The portfolio management fee schedules for **Asset Wise Analytics** are as follows:

Investment Strategies: Conservative Dynamic Growth, Moderate Dynamic Growth, & Dynamic Growth	
Portfolio Value	Annual Fee Rate Not to Exceed
Up to \$500,000.....	1.50%
Next \$500,000.....	1.25%
Next \$1,500,000 .....	1.00%
Next \$2,500,000 .....	0.75%
Over \$5,000,000 .....	0.50%

  

Investment Strategy: Short Duration Income Strategy	
Portfolio Value	Annual Fee Rate Not to Exceed
Any Account Size	1.00%

<sup>3</sup> The average daily balance is calculated by taking the sum of your account balance at the end of each day of the billing cycle and then dividing that sum by the number of days in the billing cycle.

## Protocols for Portfolio Management

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The following protocols establish how we handle our Portfolio Management accounts and what you should expect when it comes to (i) managing your account, (ii) your bill for investment services, (iii) deposits and withdrawals of funds, and (iv) other fees charged to your account(s).

### Discretion

We will establish discretionary trading authority on all management accounts to execute securities transactions without your prior consent or advice.

You may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, etc.).

### Billing

Your account will be billed monthly in arrears based on the average daily balance of your account throughout the calendar. For accounts opened between billing periods, our fee will be pro-rated from inception through the end of the monthly billing period.

Management fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

Unless otherwise agreed to in writing, we will combine the account values of family members living in the same household to determine the applicable management fee. For example, we will combine the value of your managed account(s) with the values of managed accounts held by your spouse or partner and dependent children. Combining account values may increase the managed assets total, which could result in a reduced management fee based on the breakpoints in our tiered fee schedule.

Other than the management fees listed in Item 5 (Fees & Compensation), we do not charge you any additional fees.

### Fee Exclusions

The above fees for all of our Portfolio Management services are exclusive of any charges imposed by the custodial firm who has custody of your account; including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, such as, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There may also be other fees charged to your account that are unaffiliated with our management services.

In addition, all fees paid to us for Portfolio Management services are separate from any fees and expenses charged on mutual fund shares by the Investment Company or the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expenses, such as 12b-1 fees. Redemption fees, account fees, purchase fees, contingent deferred sales charges, and other sales load charges may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds and ETFs is contained in each mutual fund's or ETF's prospectus. You are encouraged to carefully read the fund prospectus.

For more information on the custodial firm that we will recommend to custody your portfolio accounts, see Item 12, "Brokerage Practices."

### **Termination of Portfolio Management Services**

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At any time, either party (you or us) may terminate the Investment Advisory Agreement, and our Portfolio Management services, by written notification to the other party. Such written notification should include the date the termination will go into effect along with any final instructions on the account (e.g., liquidate the account, finalize all transactions, and/or cease all investment activity).

In the event termination does not fall on the last day of a calendar month, we shall bill your account a pro-rated management fee based on the number of days during the calendar month we managed your portfolio. Once the termination of investment advisory services has been implemented, neither party has any obligation to the other - we no longer earn management fees or give investment advice, and you become responsible for making your own investment decisions.

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### **PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT**

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We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

ITEM 7

### **TYPES OF CLIENTS**

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We primarily offer financial services to individuals and their families. We may also advise a foundation or endowment, a charitable organization, a corporation and/or small business, a trust, a guardianship, an estate, or any other type of entity to which we choose to give investment advice.

We generally require a minimum initial investment of \$500,000 to open a managed account; however, we retain the right to waive or reduce this minimum if we feel circumstances are warranted.

ITEM 8

### **METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS**

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Asset Wise Analytics' portfolio management services are designed to build long-term wealth while maintaining risk tolerance levels acceptable to you. We combine your financial needs and investment objectives, time horizon, and risk tolerance to yield an effective investment strategy and portfolio allocation. Your portfolio is then tailored to these unique investment parameters, primarily using a diversified mix of mutual funds, ETFs, cash, and cash equivalents. We may also use individual stocks, bonds, and other securities and investment instruments.

#### **Methods of Analysis**

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In analyzing securities to develop an efficient asset allocation portfolio, we will use a combination of analysis techniques to gather information and to guide us in our management decisions.

#### **Fundamental Analysis**

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Fundamental analysis considers: efficiency ratios, growth rates, enterprise value, economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates

to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

**RISKS** - Fundamental analysis places greater value on the long-term financial structure and health of a company, which may have little to no bearing on what is actually happening in the market place. Investing in companies with sound financial data/strength and a history of healthy returns can be a good long-term investment to hold in your portfolio; however, such fundamental data does not always correlate to the trading value of the stock on the exchanges. In the short-term, the stock can decrease in value as investors trade in other market sectors.

### Technical Analysis

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Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

**RISKS** - Technical analysis is charting the historical market data of a stock, taking into consideration current market conditions, to forecast the direction of a future stock price rather than using fundamental tools for evaluating a company's financial strength. Technical analysis focuses on the price movement of a security trading in the marketplace. This is an ideal tool for short-term investing to identify ideal market entry/exit points. However, no market indicator is absolutely reliable, and your investment portfolio can underperform in the short-term should the market indicators be incorrect.

**Fundamental analysis** provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while **technical analysis** is short-term, focusing on the statistics generated by market activity.

### Investment Strategies

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Asset Wise Analytics may utilize the following investment strategies when managing your assets:

#### Short Duration Income

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This model is designed for investors who have defined needs for their portfolio over the immediate to the next several years time frame. The model is constructed using money market instruments, short-duration ETFs, and defined maturity ETFs, laddered to match the client's objective.

#### Conservative Dynamic Growth

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This model is designed as an "all-weather" approach for investors who desire current income and growth of capital and are willing to accept drawdowns in the range of 5-10%. The portfolio is constructed using a thoughtful combination of tactical growth and income strategies, a hedged equity core, and trend-following strategies that provide expanded diversification. The tactical growth and income will generally be a blend of 40% of a tactical growth model and 60% of a tactical income model. Each model is a separate, 100% rules-based model that systematically selects the top-ranked ETFs from a targeted universe of ETFs, each month. The hedged equity core will be approximately 20% of the overall model and be composed of ETFs that may hedge downside risk and write options for additional income against a basket of large-cap US stocks. The overall model may be comprised of 10%-15% systematic, trend-following strategies utilizing both ETFs and mutual funds that follow such approaches. It is anticipated that these funds will provide additional diversification as they seek opportunities in a wide



range of additional asset classes such as currencies, metals, agriculture, energy, global equities, and fixed income.

### **Moderate Dynamic Growth**

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This model is designed as an "all-weather" balanced approach for investors who desire current income and growth of capital and are willing to accept drawdowns in the range of 8-12%. The portfolio is constructed using a thoughtful combination of tactical growth and income strategies, a hedged equity core, focused equities strategies, and trend-following strategies that provide expanded diversification. The tactical growth and income will generally be a blend of 60% of a tactical growth model and 40% of a tactical income model. Each model is a separate, 100% rules-based model that systematically selects the top-ranked ETFs from a targeted universe of ETFs, each month. The hedged equity core will be approximately 20% of the overall model and be composed of ETFs that may hedge downside risk and write options for additional income against a basket of large-cap US stocks. The overall model may be comprised of 10%-15% systematic, trend-following strategies utilizing both ETFs and mutual funds that follow such approaches. It is anticipated that these funds will provide additional diversification as they seek opportunities in a wide range of additional asset classes such as currencies, metals, agriculture, energy, global equities, and fixed income. The Moderate Dynamic Growth model may also make a 10% allocation to a focused equity strategy that may select up to 10 individual stocks from among a broader basket of large-cap US equities, using a 100% systematic, rules-based ranking methodology.

### **Dynamic Growth**

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This model is designed as an "all-weather" approach for investors who desire growth of capital and are willing to accept drawdowns in the range of 10-15%. The portfolio is constructed using a thoughtful combination of tactical growth and income strategies, a hedged equity core, focused equity strategies, and trend-following strategies that provide expanded diversification. The tactical growth and income will generally be a blend of 80% of a tactical growth model and 20% of a tactical income model. Each model is a separate, 100% rules-based model that systematically selects the top-ranked ETFs from a targeted universe of ETFs, each month. The hedged equity core will be approximately 20% of the overall model and be composed of ETFs that may hedge downside risk and write options for additional income against a basket of large-cap US stocks. The overall model may be comprised of 10%-15% systematic, trend-following strategies utilizing both ETFs and mutual funds that follow such approaches. It is anticipated that these funds will provide additional diversification as they seek opportunities in a wide range of additional asset classes such as currencies, metals, agriculture, energy, global equities, and fixed income. The Dynamic Growth model may also make a 10% allocation to a focused equity strategy that may select up to 10 individual stocks from among a broader basket of large-cap US equities, using a 100% systematic, rules-based ranking methodology.

### **Other Investment Strategies**

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In addition, we may use long term purchases, short term purchases, trading, short sales, margin transactions, options, and alternative assets when managing your assets.

Long-term purchases are investments held at least a year.

Short-term purchases are investments sold within a year.

Trading involves holding securities for less than 30 days.

**You should be aware that frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.**

## Managing Risk

The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the **market risk** factor, also known as variability or volatility risk. Other important risk factors:

- ❖ **Interest Rate Risk** - Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- ❖ **Equity Risk** - Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics, causing one to lose money.
- ❖ **Currency Risk** - Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in international securities can be affected by changes in exchange rates.
- ❖ **Inflation Risk** - The reduction of purchasing power of investments over time.
- ❖ **Commodity Risk** - Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc.).
- ❖ **Margin Risk** - Margin transactions may result in losses greater than the amount deposited in the investor's margin account. This may require additional funds to be deposited or securities to be sold at a disadvantage to the investor.
- ❖ **Options Risk** - Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.

The risk factors we have cited here are not intended to be an exhaustive list but are the most common risks your portfolio will encounter. Other risks that we have not defined could be political, over-concentration, and liquidity to name a few. However, notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your investment portfolio, **investing in a security involves a risk of loss that you should be willing and prepared to bear. Furthermore, past market performance is no guarantee that you will see equal or better future returns on your investment.**

ITEM 9

## DISCIPLINARY INFORMATION

Although Mint Asset Management is not subject to the regulatory oversight of FINRA, the following event is being disclosed to comply with the Company's duty of full and fair disclosure to its clients. In 1999, the NASD (now FINRA) alleged that Mr. Fishman operated a broker-dealer without an introducing broker-dealer financial operations principal (FINOP) and failed to maintain written supervisory procedures that addressed the receipt of client checks, thus resulting in a violation of SEC net capital rules. Without admitting or denying the allegations, Mr. Fishman consented to the NASD Letter of Acceptance, Waiver, and Consent and agreed to a \$5,000 fine, a six-month suspension from associating with any broker-dealer as a general securities principal (i.e., function in a supervisory capacity), and to requalify by examination as a general securities principal. Mr. Fishman has since paid the fine and successfully passed the Series 24 (general securities principal exam). No further action was taken by FINRA and Mr. Fishman has since been operating in good standing with securities regulators.

ITEM 10

## OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

## Financial Industry Activities

One of our supervised persons writes investment newsletters in his individual capacity as an independent contractor for Eagle Financial Publishing, an investment news publisher. Newsletters authored by this individual are published on a regular basis and provide subscribers with access to various investment strategies and recommendations. The ideas, thoughts, and opinions reflected in the newsletters are his own and do not purport to meet the investment objectives or financial needs of specific individuals or accounts. From time to time, strategies and recommendations discussed in the newsletters will be implemented in our personal accounts and client accounts managed by Mint. Therefore, to prevent our supervised persons from misusing and misappropriating any information that they become aware of prior to the publication of the newsletters, we have adopted a trading policy that, among other things, allows our Chief Compliance Officer to restrict trading in certain investments prior to and/or following the publication of a newsletter.

Other than the activity disclosed above, none of our supervised persons are licensed or are related to another financial industry participant.

ITEM 11

## CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

### Code of Ethics

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice and, at all times, act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards rooted in the most elementary maxim. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just, and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair, and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information, and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

### Client Transactions

We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all our clientele.

#### Participation or Interest

It is against our policies for any owners, officers, directors, and employees to invest with you or with a group of clients, or to advise you or a group of clients, to invest in a private business interest or other non-marketable investment unless prior approval has been granted by our Chief Compliance Officer, and such investment is not in violation of any SEC and/or State rules and regulations.

## Insider Trading Policy

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We comply with the Insider Trading and Securities Fraud Enforcement Act of 1988. We do not share any non-public information with anyone who does not need to know and have established internal controls to guard your personal information.

## Personal Trading

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Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Sometimes, such investment purchases are independent of and not connected in any way to the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be made, at or about the same time, as in an employee's account. This practice can create a conflict of interest as our employees may benefit from the sale and purchase of those securities. In these situations, we have implemented the following guidelines in order to ensure our fiduciary integrity:

1. No employee acting as an Investment Advisor Representative ("IAR"), or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.
2. Our Chief Compliance Officer, or a designated supervisor, reviews securities holdings for all our access employees on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Bunched orders (See "Aggregating Trade Orders" below under Item 12, "**Brokerage Practices**") may include employee accounts. In such cases, all client and employee accounts will receive an average share price, and transaction costs, if any, will be shared equally and on a pro rata basis. If a bunched trade is not completely filled, shares will be allocated in a fair and equitable manner.
5. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by our Chief Compliance Officer to ensure that such activities do not impact your security or create conflicts of interest.

### ITEM 12

## BROKERAGE PRACTICES

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### Custodial Services

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The Company typically recommends the custodial services of Charles Schwab & Company, Inc. ("Schwab") and Interactive Brokers, LLC ("Interactive Brokers"), both of which are registered broker-dealers and members of FINRA and SIPC. Schwab and Interactive Brokers offer us services, which include custody of securities, trade execution, clearance, and settlement of transactions.

Our recommendation for you to custody your assets with Schwab or Interactive Brokers has no direct correlation to the services we receive from the Custodians and the investment advice we offer you, although **we do receive economic benefits for which we do not have to pay** through our relationship with the Custodians that are typically not available to Schwab and Interactive Brokers retail clients. This creates an incentive for us to recommend Schwab and Interactive Brokers based on the economic benefits we receive rather than on your interest in receiving the most favorable execution. These economic benefits include the following products and services provided without cost or at a discount:

- ❖ Receipt of duplicate client statements and confirmations;
- ❖ Research related products and tools and consulting services;
- ❖ Access to a dedicated trading desk;
- ❖ Access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts);
- ❖ The ability to have advisory fees deducted directly from accounts;
- ❖ Access to an electronic communications network for order entry and account information; and,

We are not a subsidiary of, or an affiliated entity of, Schwab or Interactive Brokers. We are solely responsible for investment advice rendered, and our advisory services are provided separately and independently from Schwab and Interactive Brokers.

### **Direction of Transactions and Commission Rates (Best Execution)**

We have a fiduciary duty to put your interests before our own. The advisory support services we receive from these custodians create an economic benefit to us, and a potential conflict of interest to you in that our recommendation to custody your account(s) with Schwab or Interactive Brokers may have been influenced by these arrangements/services. This is not the case; we have selected Schwab and Interactive Brokers as our custodian of choice based on:

1. Their competitive transaction charges, trading platform, and online services for account administration and operational support.
2. Their general reputation, trading capabilities, investment inventory, financial strength, and our personal experience in working with Schwab and Interactive Brokers staff.

Since we do not recommend, suggest, or make available a selection of custodians other than Schwab and Interactive Brokers, best execution may not always be achieved. Therefore, you do not have to accept our recommendation to use Schwab or Interactive Brokers as your custodian. However, if you direct us to use another custodian, we may not be able to provide you with complete institutional services, and such services may cost you more in transaction fees.

### **Aggregating Trade Orders**

Our objective in order execution is to act fairly and impartially and to take all reasonable steps to obtain the best possible results (known as “best execution”) for our clients. Therefore, we typically bunch (aggregate) orders for a block trade when: (i) the bunching of orders is done for the purpose of achieving best execution; and (ii) no client is systematically advantaged or disadvantaged by bunching the orders. Client accounts participating in the bunched order will receive an average share price, and transaction costs, if any, will be shared equally and on a pro rata basis. If a bunched trade is not completely filled, shares will be allocated in a fair and equitable manner.

In consideration of these objectives, we will take into account the unique execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

- ❖ **Security Trading Volume** - Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
- ❖ **Number of Clients** - The fewer the number of client accounts involved in the bunched order may not yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition, preparing individual market orders for the small number of accounts involved may be quicker to complete than preparing a bunch order.

- ❖ **Financial Instruments** - The type of security involved, as well as the complexity of order, can affect our ability to achieve best execution.

## ITEM 13

**REVIEW OF ACCOUNTS****Portfolio Management Reviews**

Your investment strategies and investments are monitored and reviewed on an ongoing basis by our Managing Member, Steven Fishman, and Portfolio Manager, Michael Reilly. The general economy, market conditions, and/or changes in tax law can trigger more frequent reviews. Cash needs will be adjusted as necessary. Material changes in your personal/financial situation and/or investment objectives will require additional review and evaluation for us to properly advise you on revisions to previous recommendations and/or services. It is your responsibility to communicate these changes for us to make the appropriate corrections to your management account(s).

You will receive statements, at least quarterly, from the custodian where your account(s) are held in custody which identify your current investment holdings, the cost of each of those investments, and their current market values. In addition to receiving account statements from the custodian, we may provide you with a monthly or quarterly written report summarizing your portfolio. You are encouraged to carefully review and compare your account statements with reports that we may send to you. It is important for you to review these documents for accurate reporting and to determine whether we are meeting your investment expectations.

## ITEM 14

**CLIENT REFERRALS & OTHER COMPENSATION****Referral Compensation**

We may directly compensate persons/firms for client referrals, provided those persons are qualified and have entered into a solicitation agreement with us. Under such arrangements, if a solicitor referred you to us, the solicitor will provide complete information on our relationship and the compensation that the solicitor will receive should you choose to open an account. In no case will the fee you pay be higher than it would be if you had dealt directly with us. In addition, we will adhere to each State's rules and regulations where the solicitor resides prior to entering into any solicitation agreement with that person/firm.

**Other Compensation (Indirect Benefit)**

The Company receives an indirect economic benefit from Schwab and Interactive Brokers (See "Custodial Services" above under Item 12, "Brokerage Practices" for more detailed information on what these services and products could be).

**Retirement Transfer Compensation**

When it comes to your retirement account, you have four options to consider when transitioning employment from one employer to another or when you are seeking full retirement:

- ❖ Leave the account assets in the former employer's plan, if permitted;
- ❖ Transfer the assets to the new employer's plan, if one is available and transfers are permitted;
- ❖ Transfer the account assets to an Individual Retirement Account (an "IRA"); or,



- ❖ Cash out the retirement account assets (there will be tax consequences and/or IRS penalties depending on your age).

Should you approach us to advise you on which option would be the best for your particular situation, we have an economic incentive to recommend you transfer your retirement account to a managed IRA account with us, where we would earn a management fee on the assets. This can create a potential conflict of interest; the objectivity of the advice we render can be subjective and a cost to you. Therefore, if we recommend you transfer your retirement account to an IRA account, you are under no obligation to engage us to manage your assets. You are free to take your account anywhere.

## ITEM 15

**CUSTODY****Management Fee Deduction**

We do not take possession of or maintain custody of your funds or securities but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities are maintained with a qualified custodian as indicated above in Item 12, "Brokerage Practices."

We do, however, meet the definition of custody since you have authorized us to deduct our advisory fees directly from your account. Therefore, to comply with the custody requirements for investment advisers under SEC Rule 206(4)-2, and to protect you as well as protect our advisory practice, we have implemented the following regulatory safeguards:

- ❖ Your funds and securities will be maintained with a qualified custodian (Schwab or Interactive Brokers) in a separate account in your name.
- ❖ Authorization to withdraw our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.

In addition, the custodian is required by law to send you, at least quarterly, brokerage statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. You are encouraged to compare and review the financial data contained in our reports and fee invoices to the account statement received from the custodian to verify the accuracy of our reporting and billing. The account custodian does not verify the accuracy of the portfolio management fee calculation.

## ITEM 16

**INVESTMENT DISCRETION**

We provide investment management services on a discretionary basis. If you engage us for such services, you may place limitations, in writing, on our discretionary authority to the extent that the limitations do not adversely affect our ability to properly manage your account. Prior to us exercising discretionary authority in your account, you will be required to execute an investment advisory agreement or limited power of attorney, granting us full authority to supervise and direct the investments in your account. Although we have this authority, you retain all rights of ownership of the account and may revoke this authority at any time.

## ITEM 17

**VOTING CLIENT SECURITIES**

**We do not vote client proxies.** You understand and agree that you retain the right to vote all proxies solicited for securities held in your managed accounts. The custodian of your managed accounts will mail you all proxy solicitations. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

However, if you have specific questions regarding an action being solicited by the proxy that you do not understand or want clarification, you may contact us and we will explain the particulars. Keep in mind we will not advise you in a direction to vote; the ultimate decision on how you vote is your responsibility and left to you to decide.

**ITEM 18****FINANCIAL INFORMATION**

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We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$500.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you. In addition, the Company has not, nor have any of our officers and directors, been the subject of a bankruptcy petition at any time during the past ten years.

**END OF DISCLOSURE BROCHURE**



## ITEM 1 - COVER PAGE

### FORM ADV: PART 2B BROCHURE SUPPLEMENT

# MINT

ASSET MANAGEMENT

#### BRANCH OFFICE

3 Arlington Road  
West Hartford, CT 06107

Tel: 551-201.1250

#### CORPORATE OFFICE

165 Broadway, 23<sup>rd</sup> Floor  
New York, NY 10006

Tel: 908.777.1717

[www.mintassetmanagement.com](http://www.mintassetmanagement.com)

BROCHURE SUPPLEMENT  
DATED

20  
DECEMBER  
2024

This Brochure Supplement provides information about Michael J. Reilly that is an accompaniment to the Disclosure Brochure for our firm, Mint Asset Management, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Reilly, you are welcome to contact us - our contact information is listed to the left.

Additional information about Mint Asset Management, LLC and Michael J. Reilly is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Michael J. Reilly

CRD#: 2006998

Year of Birth: 1964

### ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

#### Education

1986 - Southern Connecticut State University: Bachelor of Science in Economics

#### Licenses

FINRA Exams: Series 65 - Uniform Investment Advisor Law Examination

#### Business Background

03/2024 - Present.....Mint Asset Management LLC

**Position:** Investment Adviser Representative

11/2015 - 03/2024.....Rowe Wealth Management, LLC d/b/a Avalon

**Position:** Principal, CCO, & Investment Adviser Representative

01/2009 -11/2015.....LPL Financial LLC

**Position:** Registered Representative

03/1997 01/2009.....Securities America Advisors Inc.

**Position:** Investment Adviser Representative

### ITEM 3 - DISCIPLINARY INFORMATION

Mr. Reilly has reportable disclosure events, the details of which on FINRA's BrokerCheck website at <https://brokercheck.finra.org> or the SEC IAPD website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### ITEM 4 - OTHER BUSINESS ACTIVITIES

Mr. Reilly is not involved in any other business activities outside of his employment with Mint Asset Management, LLC that provides a substantial source of income or involves a substantial amount of time.

### ITEM 5 - ADDITIONAL COMPENSATION

Mr. Reilly does not receive any economic benefit, incentives, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

### ITEM 6 - SUPERVISION

Steven Fishman

Managing Member & Chief Compliance Officer

Tel: 908.777.1717

Mr. Fishman is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

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ITEM 1 - COVER PAGE

**FORM ADV: PART 2B**  
BROCHURE SUPPLEMENT

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[www.mintassetmanagement.com](http://www.mintassetmanagement.com)

BROCHURE SUPPLEMENT  
DATED

**20**  
**DECEMBER**  
**2024**

This Brochure Supplement provides information about Steven Fishman that is an accompaniment to the Disclosure Brochure for our firm, Mint Asset Management, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Fishman, you are welcome to contact us - our contact information is listed to the left.

Additional information about Mint Asset Management, LLC and Steven Fishman is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Steven Fishman**

CRD#: 2428781

Year of Birth: 1968

**ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Education**

1994 - City University of NY - College of Staten Island: Bachelor of Science in Finance

**Licenses**

FINRA Exams: Series 65 - Uniform Investment Advisor Law Examination

**Business Background**

03/2020 - Present.....Mint Asset Management LLC

**Position:** Managing Member & Chief Compliance Officer

01/2012 - Present.....Savvy Investor LLC

**Position:** Partner

11/2011 - Present.....Green Earth Merchants LLC

**Position:** General Partner

04/2008 - Present.....Danimax LLC

**Position:** General Partner

**ITEM 3 - DISCIPLINARY INFORMATION**

Mr. Fishman has not been the subject of any legal or disciplinary action by any court, regulatory agency, or self-regulatory organization in the past ten years.

**ITEM 4 - OTHER BUSINESS ACTIVITIES**

In addition to his role with Mint Asset Management LLC, Mr. Fishman is a (i) Partner with Savvy Investor LLC, a marketing consulting firm for publishing companies and financial institutions; (ii) General Partner with Green Earth Merchants LLC, a credit card processing company; and (iii) General Partner with Danimax LLC, the holding company for Savvy Investor LLC and Green Earth Merchants LLC. These businesses provide a substantial source of Mr. Fishman's income and involve a substantial amount of his time.

**Potential Time Management Conflict**

Mr. Fishman may spend approximately 25 hours per month engaged in these other business activities. His responsibility to these other business activities may occasionally create a time management conflict that you should consider. However, Mr. Fishman feels his responsibilities relating to these business activities will not distract from his duty to monitor your investment portfolio.

**ITEM 5 - ADDITIONAL COMPENSATION**

Mr. Fishman does not receive any economic benefit, incentives, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

**ITEM 6 - SUPERVISION**

**Steven Fishman**

Managing Member & Chief Compliance Officer

Tel: 908.777.1717

Mr. Fishman is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures. His other duties include, but are not limited to, meeting periodically with all employees to impress upon them their fundamental principles of conduct and professionalism in following our Code of Ethics and confirming they are acting in our clients' best interests in discharging their duties.

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