

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**

**Axim Planning & Wealth**

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March 22, 2022

This brochure provides information about the qualifications and business practices of Axim Wealth Management LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 937-291-2060. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

**ADDITIONAL INFORMATION ABOUT AXIM WEALTH MANAGEMENT LLC  
(CRD #319618) IS AVAILABLE ON THE SEC'S WEBSITE AT  
[WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV)**

## **Item 2: Material Changes**

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

Initial Filing.

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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

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## **Item 4: Advisory Business**

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### **Firm Description**

Axim Wealth Management LLC dba Axim Planning & Wealth was founded in 2017 and became registered to offer investment advisory services in 2022. Luong Pham is 100% owner.

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### **Types of Advisory Services**

#### **ASSET MANAGEMENT**

Axim Planning & Wealth offers discretionary asset management services to advisory Clients. Axim Planning & Wealth will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize Axim Planning & Wealth discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When deemed appropriate for the Client, Axim Planning & Wealth may hire Sub-Advisors to manage all or a portion of the assets in the Client account. Axim Planning & Wealth has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Axim Planning & Wealth. Sub-Advisors execute trades on behalf of Axim Planning & Wealth in Client accounts. Axim Planning & Wealth will be responsible for the overall direct relationship with the Client. Axim Planning & Wealth retains the authority to terminate the Sub-Advisor relationship at Axim Planning & Wealth's discretion.

As part of the recommendations provided, the Client may have a financial plan completed. This may include but is not limited to a thorough review of all applicable topics such as Wills, Estate Plans and Trusts, Investments, Taxes, Qualified Plans, Insurance, Retirement Income, Social Security, and College Planning. If a conflict of interest exists between the interests of Axim Planning & Wealth and the interests of the Client, the Client is under no obligation to act upon Axim Planning & Wealth's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Axim Planning & Wealth. This service will be provided at no additional cost to the Client.

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### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

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### **Wrap Fee Programs**

Axim Planning & Wealth does not sponsor any wrap fee programs.

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### **Client Assets under Management**

As this is the initial filing of this brochure, Axim Planning & Wealth has no Client assets under management.

## Item 5: Fees and Compensation

### Method of Compensation and Fee Schedule

#### ASSET MANAGEMENT

Axim Planning & Wealth offers discretionary direct asset management services to advisory Clients. Axim Planning & Wealth charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
First \$250,000 (\$0-\$250,000)	2.75%	.6875%
Your next \$250,000 (\$250,000.01 - \$500,000)	2.50%	.6250%
Your next \$500,000 (\$500,000.01 - \$1,000,000)	2.00%	.5000%
Your next \$1,500,000 (\$1,000,000.01 - \$2,500,000)	1.75%	.4375%
Your next \$1,500,000 (\$2,500,000.01 - \$5,000,000)	1.50%	.3750%
Subsequent amounts (\$5,000,000.01+)	1.25%	0.3125%

This is a tiered/blended fee schedule, the asset management fee is calculated by applying different rates to different portions of the portfolio. Axim Planning & Wealth may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

#### **For example (based on a quarterly billing period):**

Client with \$2,500,000 under management would pay \$12,343.75 on an quarterly basis.

<u>AUM</u>	<u>Quarterly fee</u>	<u>Total</u>
First \$250,000	x 0.6875% =	\$1,718.75
Next \$250,000	x 0.6250% =	\$1,562.50
Next \$500,000	x 0.5000% =	\$2,500.00
Next \$1,500,000	x 0.4375% =	\$6,562.50
Total for the quarter		<u>\$12,343.75</u>

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Axim Planning & Wealth with thirty (30) days written notice to Client and by the Client at any time with written notice to Axim Planning & Wealth. For accounts opened or closed mid-billing period, fees will be prorated based on the days

services are provided during the given period. All unpaid earned fees will be due to Axim Planning & Wealth. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

Axim Planning & Wealth may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Axim Planning & Wealth will enter into Sub-Advisor agreements with other registered investment advisor firms. When using Sub-Advisors, the Client will not pay additional fees. The Sub-Advisors fees are inclusive of the total fee disclosed by Axim Planning & Wealth. Sub-Advisor directly deducts the fees separately for both the sub-advisory firm and Axim Planning & Wealth.

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**Client Payment of Fees**

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed to the Client and paid directly to Axim Planning & Wealth.

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**Additional Client Fees Charged**

Custodians may charge transaction fees other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Axim Planning & Wealth does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Axim Planning & Wealth. For more details on the brokerage practices, see Item 12 of this brochure.

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**Prepayment of Client Fees**

Axim Planning & Wealth does not require any prepayment of fees of more than \$1,200 per Client and six months or more in advance.

Investment management fees are billed quarterly in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Axim Planning & Wealth.

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**External Compensation for the Sale of Securities to Clients**

Investment Advisor Representatives of Axim Planning & Wealth receive external compensation from sales of investment related products such as insurance as licensed insurance agents. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, procedures, and Axim Planning & Wealth's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing.



## **Item 6: Performance-Based Fees and Side-by-Side Management**

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Axim Planning & Wealth does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for Axim Planning & Wealth to recommend an investment that may carry a higher degree of risk to the Client.

## **Item 7: Types of Clients**

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### **Description**

Axim Planning & Wealth generally provides investment advice to individuals, high net worth individuals, corporations or business entities. Client relationships vary in scope and length of service.

### **Account Minimums**

Axim Planning & Wealth does not require a minimum to open an account.

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

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### **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

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## Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Axim Planning & Wealth. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

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## Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Axim Planning & Wealth:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a

security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Foreign Investment Risk:* Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting

standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
  - Sub-Advisor fails to execute the stated investment strategy
- Business Risk
  - Sub-Advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor's which is disclosed in the Sub-Advisor's Form ADV Part 2.

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## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

Axim Planning & Wealth and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

Axim Planning & Wealth and its management have not been involved in administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

Axim Planning & Wealth and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of Axim Planning & Wealth or the integrity of its management.

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## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

Axim Planning & Wealth is not registered as a broker-dealer and no affiliated representatives of Axim Planning & Wealth are registered representatives of a broker-dealer.

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### **Futures or Commodity Registration**

Neither Axim Planning & Wealth nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Luong Pham has a financial affiliated business as an insurance agent with Axim Insurance LLC. Approximately 10% of his time is spent on this activity. He will offer Clients services from this activity. As an insurance agent, he will receive separate yet typical compensation.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by

disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Axim Planning & Wealth may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Axim Planning & Wealth. Sub-Advisors execute all trades on behalf of Axim Planning & Wealth in Client accounts. Axim Planning & Wealth will be responsible for the overall direct relationship with the Client. Axim Planning & Wealth retains the authority to terminate the Sub-Advisor relationship at Axim Planning & Wealth's discretion.

In addition to the authority granted to Axim Planning & Wealth, Clients will grant Axim Planning & Wealth full discretionary authority and authorizes Axim Planning & Wealth to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to Axim Planning & Wealth in the Agreement. In addition, at Axim Planning & Wealth's discretion, Axim Planning & Wealth may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors. Axim Planning & Wealth ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

This practice represents a conflict of interest as Axim Planning & Wealth may select Sub-Advisors who charge a lower fee for their services than other Sub-Advisors. This conflict is mitigated by disclosures, procedures, and by the fact that Axim Planning & Wealth has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

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

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**Code of Ethics Description**

The affiliated persons (affiliated persons include employees and/or independent contractors) of Axim Planning & Wealth have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Axim Planning & Wealth affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Axim Planning & Wealth. The Code reflects Axim Planning & Wealth and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Axim Planning & Wealth's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Axim Planning & Wealth may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Axim Planning & Wealth's Code is based on the guiding principle that the interests of the Client are our top priority. Axim Planning & Wealth's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Axim Planning & Wealth will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

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#### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Axim Planning & Wealth and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

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#### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Axim Planning & Wealth and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Axim Planning & Wealth with copies of their brokerage statements.

The Chief Compliance Officer of Axim Planning & Wealth is Luong Pham. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

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#### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Axim Planning & Wealth does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Axim Planning & Wealth with copies of their brokerage statements.

The Chief Compliance Officer of Axim Planning & Wealth is Luong Pham. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the

personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Broker-Dealers for Client Transactions**

Axim Planning & Wealth will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Axim Planning & Wealth will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Axim Planning & Wealth relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Axim Planning & Wealth. Axim Planning & Wealth does not receive any portion of the trading fees.

Axim Planning & Wealth will recommend the use of Charles Schwab & Co., Inc.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Axim Planning & Wealth from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although Axim Planning & Wealth has no formal soft dollar arrangements, Axim Planning & Wealth may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, Axim Planning & Wealth receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Axim Planning & Wealth. Axim Planning & Wealth cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. Axim Planning & Wealth does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when Axim Planning & Wealth receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that Axim Planning & Wealth has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*

Axim Planning & Wealth does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Directed Brokerage*

Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of client transactions as client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

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**Aggregating Securities Transactions for Client Accounts**

Axim Planning & Wealth is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Axim Planning & Wealth. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

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**Item 13: Review of Accounts**

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**Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by the Chief Compliance Officer of Axim Planning & Wealth, Luong Pham. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, Axim Planning & Wealth suggests updating at least annually.

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**Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

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**Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by Axim Planning & Wealth's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs. Performance reports will be provided by Axim Planning & Wealth at least monthly to Clients with assets under management.

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**Item 14: Client Referrals and Other Compensation**

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**Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

Axim Planning & Wealth receives additional economic benefits from external sources as described above in Item 12.



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**Advisory Firm Payments for Client Referrals**

Axim Planning & Wealth may enter into agreements with individuals and organizations, which may be affiliated or unaffiliated with Axim Planning & Wealth, that refer Clients to Axim Planning & Wealth in exchange for compensation. All such agreements will be in writing and comply with the requirements of Federal or State regulation. If a Client is introduced to Axim Planning & Wealth by a solicitor, Axim Planning & Wealth may pay that solicitor a fee. While the specific terms of each agreement may differ, generally, the compensation will be based upon Axim Planning & Wealth's engagement of new Clients and is calculated using a varying percentage of the fees paid to Axim Planning & Wealth by such Clients. Any such fee shall be paid solely from Axim Planning & Wealth's investment management fee, and shall not result in any additional charge to the Client.

Each prospective Client who is referred to Axim Planning & Wealth under such an arrangement will receive a copy of this brochure and a separate written disclosure document disclosing the nature of the relationship between the solicitor and Axim Planning & Wealth and the amount of compensation that will be paid by Axim Planning & Wealth to the solicitor. The solicitor is required to obtain the Client's signature acknowledging receipt of Axim Planning & Wealth's disclosure brochure and the solicitor's written disclosure statement.

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**Item 15: Custody****Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by Axim Planning & Wealth.

Axim Planning & Wealth is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Axim Planning & Wealth.

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**Item 16: Investment Discretion****Discretionary Authority for Trading**

Axim Planning & Wealth requires discretionary authority to manage securities accounts on behalf of Clients. Axim Planning & Wealth has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

Axim Planning & Wealth allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to Axim Planning & Wealth in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. Axim Planning & Wealth does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

Axim Planning & Wealth does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Axim Planning & Wealth will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided to Clients because Axim Planning & Wealth does not serve as a custodian for Client funds or securities and Axim Planning & Wealth does not require prepayment of fees of more than \$1,200 per Client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Axim Planning & Wealth has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

### **Bankruptcy Petitions during the Past Ten Years**

Axim Planning & Wealth has not had any bankruptcy petitions in the last ten years.

Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Luong Pham

**Axim Wealth Management LLC**

**Office Address:**

8379 Yankee Street  
Dayton, OH 45458

**Tel:** 937-291-2060

**Email:** [luongpham1968@yahoo.com](mailto:luongpham1968@yahoo.com)

**Website:** [www.aximwealthmanagement.com](http://www.aximwealthmanagement.com)

March 22, 2022

This brochure supplement provides information about Luong Pham and supplements the Axim Wealth Management LLC brochure. You should have received a copy of that brochure. Please contact Luong Pham if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT LUONG PHAM (CRD #2830422) IS AVAILABLE ON THE SEC'S WEBSITE AT [WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV).**

## **Brochure Supplement (Part 2B of Form ADV)**

### **Supervised Person Brochure**

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#### **Principal Executive Officer – Luong Pham**

- Year of birth: 1968
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#### **Item 2 - Educational Background and Business Experience**

##### Educational Background:

- Wright State University; Bachelor of Science – Medical Technology; 1996

##### Business Experience:

- Axim Wealth Management LLC dba Axim Planning & Wealth; Investment Advisor Representative/Chief Compliance Officer; 03/2022-Present
  - Axim Insurance LLC; Insurance Agent/Owner; 12/2017-Present
  - Axim Wealth Management LLC dba Axim Planning & Wealth; Managing Member; 03/2017-Present
  - Cetera Advisors LLC; Registered Representative/Investment Advisor Representative; 05/2019-04/2022
  - TCFG Investment Advisors, LLC; Investment Advisor Representative; 12/2017-06/2019
  - TCFG Wealth Management, LLC; Registered Representative; 12/2017-01/2018
  - Wells Fargo Clearing Services, LLC; Registered Representative/Investment Advisor Representative; 12/2012-12/2017
  - FSIC; Registered Representative; 12/2017-12/2017
  - United Advisors Services, LLC; Investment Advisor Representative; 12/2017-12/2017
  - Ameriprise Financial Services, Inc.; Registered Representative/Investment Advisor Representative; 10/2009-01/2013
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#### **Item 3 - Disciplinary Information**

A. Mr. Pham has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment-related statute or regulation; or

4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Pham never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
  2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority  
(a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Pham has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
  2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Pham has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

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**Item 4 - Other Business Activities**

Luong Pham has a financial affiliated business as an insurance agent with Axim Insurance LLC. Approximately 10% of his time is spent on this activity. He will offer Clients services from this activity. As an insurance agent, he will receive separate yet typical compensation.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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**Item 5 - Additional Compensation**

Mr. Pham receives commissions on the insurance products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is described in Item 5 of Part 2A.

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**Item 6 - Supervision**

Since Mr. Pham is the sole owner and investment adviser representative of Axim Planning & Wealth and is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at [luongpham1968@yahoo.com](mailto:luongpham1968@yahoo.com) or 937-291-2060.