



## **MultiGenerational.Black Inc.**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 24, 2023**

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of MultiGenerational.Black Inc. ("MultiGenerational" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at 917-971-6155 or by email at [hello@multigenerational.black](mailto:hello@multigenerational.black).

MultiGenerational is a registered investment advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about MultiGenerational to assist you in determining whether to retain the Advisor.

Additional information about MultiGenerational and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 322228.

**MultiGenerational.Black Inc.**  
**99 Wall Street, Suite 2223, New York, NY 10023**  
**Phone: 917-971-6155**  
**[www.multigenerational.black](http://www.multigenerational.black)**

## Item 2 – Material Changes

---

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of MultiGenerational. For convenience, the Advisor has combined these documents into a single disclosure document.

MultiGenerational believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. MultiGenerational encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

MultiGenerational is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 322228. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at 917-971-6155 or by email at [hello@multigenerational.black](mailto:hello@multigenerational.black).

---

#### **MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023  
Phone: 917-971-6155  
[www.multigenerational.black](http://www.multigenerational.black)

### Item 3 – Table of Contents

---

<b>Item 1 – Cover Page .....</b>	<b>1</b>
<b>Item 2 – Material Changes .....</b>	<b>2</b>
<b>Item 3 – Table of Contents .....</b>	<b>3</b>
<b>Item 4 – Advisory Services .....</b>	<b>4</b>
A. Firm Information .....	4
B. Advisory Services Offered .....	4
C. Client Account Management .....	5
D. Wrap Fee Programs .....	6
E. Assets Under Management .....	6
<b>Item 5 – Fees and Compensation .....</b>	<b>6</b>
A. Fees for Advisory Services .....	6
B. Fee Billing .....	6
C. Other Fees and Expenses .....	7
D. Advance Payment of Fees and Termination .....	7
E. Compensation for Sales of Securities .....	7
<b>Item 6 – Performance-Based Fees and Side-By-Side Management .....</b>	<b>7</b>
<b>Item 7 – Types of Clients .....</b>	<b>7</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>7</b>
A. Methods of Analysis .....	8
B. Risk of Loss .....	8
<b>Item 9 – Disciplinary Information .....</b>	<b>9</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations .....</b>	<b>10</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b>	<b>10</b>
A. Code of Ethics .....	10
B. Personal Trading with Material Interest .....	10
C. Personal Trading in Same Securities as Clients .....	10
D. Personal Trading at Same Time as Client .....	10
<b>Item 12 – Brokerage Practices .....</b>	<b>10</b>
A. Recommendation of Custodian[s] .....	10
B. Aggregating and Allocating Trades .....	11
<b>Item 13 – Review of Accounts .....</b>	<b>11</b>
A. Frequency of Reviews .....	11
B. Causes for Reviews .....	11
C. Review Reports .....	12
<b>Item 14 – Client Referrals and Other Compensation .....</b>	<b>12</b>
A. Compensation Received by MultiGenerational .....	12
B. Client Referrals from Solicitors .....	12
<b>Item 15 – Custody .....</b>	<b>12</b>
<b>Item 16 – Investment Discretion .....</b>	<b>12</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>13</b>
<b>Item 18 – Financial Information .....</b>	<b>13</b>
<b>Item 19 – Requirements of State Registered Advisers .....</b>	<b>13</b>
<b>Form ADV Part 2B – Brochure Supplement .....</b>	<b>14</b>
<b>Privacy Policy .....</b>	<b>17</b>

## Item 4 – Advisory Services

---

### A. Firm Information

MultiGenerational.Black Inc. (“MultiGenerational” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission. The Advisor is organized as a Corporation under the laws of the State of Delaware. MultiGenerational was founded in April 2021 and is owned and operated by Leslie Lewis (Chief Executive Officer and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by MultiGenerational.

### B. Advisory Services Offered

MultiGenerational offers investment advisory services to individuals, estates, businesses, and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. MultiGenerational's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

MultiGenerational provides tailored investment advisory solutions to its Clients. This is achieved through personal Client contact and interaction while providing discretionary investment management over Client portfolios and a broad range of comprehensive financial planning. These services are described below.

*Investment Management Services* - MultiGenerational utilizes ‘*The MGB Investing Starter Kit*’ which provides information to help the first time African American Stock Market investor get ready to invest, by teaching basics about the market, plus having a reserve of cash/emergency fund, a will, health care proxy and power of attorney, and other things to help a person be ready to invest. This is achieved through continuous personal Client contact and interaction while providing discretionary and related advisory services. MultiGenerational works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. MultiGenerational will then construct an investment portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client's investment goals. The Advisor may retain certain types of legacy investments based on portfolio fit and/or tax considerations.

MultiGenerational's investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. MultiGenerational will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

MultiGenerational evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. MultiGenerational may recommend, on occasion, redistributing investment allocations to diversify the portfolio. MultiGenerational may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement.

MultiGenerational may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will MultiGenerational accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

---

MultiGenerational.Black Inc.

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

*Financial Planning Services* - MultiGenerational will typically provide a variety of financial planning services to Clients as part of its Wealth Management Services. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, and other areas of a Client’s financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

MultiGenerational may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

#### The MGB Investing Starter Kit Workshop

MultiGenerational provides educational seminars based on the ‘*The MGB Investing Starter Kit Workshop*’ focus on personal finance and investing for first time African American Stock Market investor. Topics may include issues related to general financial planning, educational funding, estate planning, retirement strategies, implications involving changes in marital status, and various other current economic or investment topics. Our workshops are educational in nature and do not involve the sale of insurance or investment products.

### **C. Client Account Management**

Prior to engaging MultiGenerational to provide investment advisory services, each Client is required to enter into an agreement with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – MultiGenerational, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – MultiGenerational will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – MultiGenerational will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.

---

**MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)

- Investment Management and Supervision – MultiGenerational will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Programs**

MultiGenerational does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by MultiGenerational.

#### **E. Assets Under Management**

MultiGenerational has \$43,118 in discretionary assets under management and \$0 in non-discretionary assets under management as of March 2023.

### **Item 5 – Fees and Compensation**

---

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

#### **A. Fees for Advisory Services**

##### Wealth Management Services

Investment advisory fees are paid monthly in arrears pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the calendar month. Investment advisory fees range from \$1 to \$5 per month based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first month of service is prorated from the inception date of the account[s] to the end of the first month. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by MultiGenerational will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuation to ensure accurate billing.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

##### The MGB Investing Starter Kit Workshop

The MGB Investing Starter Kit Workshop services for a fixed fee of \$97.79. Fees may be negotiable based the overall relationship with the Advisor.

#### **B. Fee Billing**

##### Wealth Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective month end date. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by MultiGenerational to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

##### The MGB Investing Starter Kit Workshop

The MGB Investing Starter Kit Workshop is paid one hundred percent (100%) upfront.

---

**MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than MultiGenerational, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by MultiGenerational are separate and distinct from these custody and execution fees.

In addition, all fees paid to MultiGenerational for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of MultiGenerational, but would not receive the services provided by MultiGenerational which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by MultiGenerational to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

MultiGenerational may be compensated for its investment management services at the end of the month after services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### The MGB Investing Starter Kit Workshop

MultiGenerational is compensated for the workshop in advance of the workshop. If the Client decides to not attend the workshop, the Advisor will refund any fees collected prior to the workshop.

### **E. Compensation for Sales of Securities**

MultiGenerational does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

---

MultiGenerational does not charge performance-based fees for its investment advisory services. The fees charged by MultiGenerational are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

MultiGenerational does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

---

MultiGenerational offers investment advisory services to individuals, estates, businesses, and retirement plans. MultiGenerational generally does not impose a minimum relationship size.

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

---

---

**MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)



## **A. Methods of Analysis**

MultiGenerational primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from MultiGenerational are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, MultiGenerational generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. MultiGenerational will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, MultiGenerational may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. MultiGenerational will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from

---

**MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)



the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Inflation Risk, also known as Purchasing Power Risk, arises from the decline in value of securities cash flow due to inflation, which is measured in terms of purchasing power. Inflation Protection Bonds such as TIPS are the only protection offered against this risk. Floaters, the resetting of the interest rates, can help reduce inflation risk. All other bonds have fixed interest rates for the life of the bond, which exposes the investor to this risk.

Interest Rate Risk is the risk that an investment's value will change due to a change in the absolute level of interest rates, spread between two rates, shape of the yield curve, or in any other interest rate relationship. These changes can be reduced by diversifying or hedging, since the changes usually affect securities inversely.

Economic Risk is the chance that macroeconomic conditions like exchange rates, government regulation, or political stability will affect an investment, usually one in a foreign country.

Market Risk, also called systematic risk, is the possibility of an investor experiencing losses due to factors that affect the overall performance of the financial markets in which they are involved. This type of risk can be hedged against, but cannot be eliminated through diversification. Sources of market risk include recessions, political turmoil, changes in interest rates, natural disasters and terrorist attacks.

Political Risk, also known as geopolitical risk, is risk an investment's returns could suffer as a result of political changes or instability in a country. This becomes more of a factor as the time horizon of an investment gets longer. Instability affecting investment returns could stem from a change in government, legislative bodies, other foreign policy makers or military control.

Regulatory Risk is the risk that a change in laws and/or regulations will materially impact a security, business, sector or market. These changes can increase the costs of operating a business, reduce the attractiveness of an investment, or change the competitive landscape, and are made by either the government or a regulatory body.

Liquidity Risk stems from the lack of marketability of an investment that cannot be bought or sold quickly enough to prevent or minimize a loss. It is typically reflected in unusually wide bid-ask spreads or large price movements. Typically, the smaller the size of the security or its issuer, the larger the liquidity risk.

Credit Risk traditionally refers to the risk that a lender may not receive the owed principal and interest, which results in an interruption of cash flows and increased costs for collection. Credit risk is the probable risk of loss resulting from a borrower's failure to repay a loan or meet contractual obligations. While impossible to know exactly who will default on obligations, with proper assessment and credit risk management, the severity of loss can be lessened. A lender's or investor's reward for assuming credit risk include the interest payments from the borrower or issuer of a debt obligation.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

#### **Item 9 – Disciplinary Information**

**There are no regulatory or disciplinary events involving MultiGenerational or its owner.** MultiGenerational values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are

---

**MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)

available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 322228.

---

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

---

The sole business of MultiGenerational and Ms. Lewis is to provide investment advisory services to its Clients. Neither MultiGenerational nor Ms. Lewis are involved in other business endeavors. MultiGenerational does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

---

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

---

### **A. Code of Ethics**

MultiGenerational has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with MultiGenerational ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. MultiGenerational and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of MultiGenerational's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at 917-971-6155 or via email at [hello@multigenerational.black](mailto:hello@multigenerational.black).

### **B. Personal Trading with Material Interest**

MultiGenerational allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. MultiGenerational does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. MultiGenerational does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

MultiGenerational allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by conducting a coordinated review of personal accounts and the accounts of the Clients. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While MultiGenerational allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will MultiGenerational, or any Supervised Person of MultiGenerational, transact in any security to the detriment of any Client.**

---

## **Item 12 – Brokerage Practices**

---

### **A. Recommendation of Custodian[s]**

MultiGenerational does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize MultiGenerational to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, MultiGenerational does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where MultiGenerational does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by MultiGenerational. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. MultiGenerational may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

MultiGenerational will generally recommend that Clients establish their account[s] at Altruist Financial LLC ("Altruist"), a FINRA-registered broker-dealer and member SIPC. Altruist will serve as the Client's "qualified custodian". MultiGenerational maintains an institutional relationship with Altruist, whereby the Advisor receives economic benefits. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **MultiGenerational does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - MultiGenerational does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where MultiGenerational will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). MultiGenerational will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. MultiGenerational will execute its transactions through the Custodian as authorized by the Client. MultiGenerational may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

## **Item 13 – Review of Accounts**

---

### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Leslie Lewis, Chief Compliance Officer of MultiGenerational. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major

changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify MultiGenerational if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referrals and Other Compensation**

---

### **A. Compensation Received by MultiGenerational**

MultiGenerational is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. MultiGenerational does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. MultiGenerational may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, MultiGenerational may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

MultiGenerational has established an institutional relationship with Altruist to assist the Advisor in managing Client account[s]. Access to the Altruist platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Altruist. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

### **B. Client Referrals from Solicitors**

MultiGenerational does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

---

MultiGenerational does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct MultiGenerational to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by MultiGenerational to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

## **Item 16 – Investment Discretion**

---

MultiGenerational generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to

---

**MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)

by MultiGenerational. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by MultiGenerational will be in accordance with each Client's investment objectives and goals.

---

## **Item 17 – Voting Client Securities**

---

MultiGenerational does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

---

## **Item 18 – Financial Information**

---

Neither MultiGenerational, nor its management, have any adverse financial situations that would reasonably impair the ability of MultiGenerational to meet all obligations to its Clients. Neither MultiGenerational, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. MultiGenerational is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

---

## **Item 19 – Requirements of State Registered Advisers**

---

### **A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

The education and business background of MultiGenerational's current management persons/executive officers, Leslie Lewis can be found on the individual's Form ADV Part 2B brochure supplement and Paul Bryant below.

Paul E. Bryant has been the Co-Owner of MultiGenerational since 04/2021. Ms. Lewis earned a Bachelors of Arts Degree from Morehouse College in 2009. Mr. Bryant was an Analyst at JP Morgan Chase from 2009 to 2022 and is currently a Consultant for McKinsey and Company.

### **B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the individual's Form ADV Part 2B brochure supplement.

### **C. How Performance-based Fees are Calculated and Degree of Risk to Clients**

MultiGenerational does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **D. Material Disciplinary Disclosures for Management Persons of this Firm**

No management person at MultiGenerational or MultiGenerational has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

### **E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

Neither MultiGenerational, nor its management persons, has any relationship or arrangement with issuers of securities.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Leslie M. Lewis**  
**Chief Executive Officer and Chief Compliance Officer**

**Effective: March 21, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Leslie M. Lewis (CRD# 7630146) in addition to the information contained in the MultiGenerational.Black Inc. (“MultiGenerational” or the “Advisor”, CRD# 322228) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the MultiGenerational Disclosure Brochure or this Brochure Supplement, please contact us at 917-971-6155 or by email at [hello@multigenerational.black](mailto:hello@multigenerational.black).

Additional information about Ms. Lewis is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 7630146.



## Item 2 – Educational Background and Business Experience

---

Leslie M. Lewis, born in 1973, is dedicated to advising Clients of MultiGenerational as the Chief Executive Officer and Chief Compliance Officer. Ms. Lewis earned a Masters of Fine Arts from UCLA School of Theater Film and Television in 2004. Ms. Lewis also earned an AB from Harvard University in 1995. Additional information regarding Ms. Lewis's employment history is included below.

### Employment History:

Chief Executive Officer and Chief Compliance Officer, MultiGenerational.Black Inc.	10/2022 to Present
Actor, Producer, Briar Patch Productions	01/2012 to Present
Writer, Publisher, Bookmark Publications	12/2014 to Present
Freelance Writer, Business Insider	02/2022 to Present
Speaker, Bank of America	03/2022 to 03/2022
Actor, Magis Theatre Company	01/2017 to 02/2017
Actor, Acuity Productions	07/2015 to 08/2015
Yoga Teacher, Love Yoga Center	10/2013 to 12/2014

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Ms. Lewis.*** Ms. Lewis has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Lewis.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Lewis.***

However, we do encourage you to independently view the background of Ms. Lewis on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 7630146.

## Item 4 – Other Business Activities

---

### Board Member

Ms. Lewis is a board member Emeritus of the Reginald F Lewis Foundation. Ms. Lewis spends less than 10% of her time per month.

### Bookmark Publications

Ms. Lewis is a publisher and author of Bookmark Publications. Ms. Lewis' role is to oversee published titles. Ms. Lewis spends less than 10% of her time per month.

### Briar Patch Productions

Ms. Lewis is a producer of Briar Patch Productions. Ms. Lewis' role is to review and oversee production opportunities in theater and film. Ms. Lewis spends less than 10% of her time per month.

## Item 5 – Additional Compensation

---

Ms. Lewis has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

---

Ms. Lewis serves as the CEO and Chief Compliance Officer of MultiGenerational. Ms. Lewis can be reached at 917-971-6155.



MultiGenerational has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of MultiGenerational. Further, MultiGenerational is subject to regulatory oversight by various agencies. These agencies require registration by MultiGenerational and its Supervised Persons. As a registered entity, MultiGenerational is subject to examinations by regulators, which may be announced or unannounced. MultiGenerational is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Item 7 – Requirements for State Registered Advisors**

---

- A. Ms. Lewis has not been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Ms. Lewis has not been the subject of a bankruptcy petition.

## Privacy Policy

---

Effective: October 12, 2022

### Our Commitment to You

MultiGenerational.Black Inc. ("MultiGenerational" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. MultiGenerational (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

MultiGenerational does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

---

**MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)

## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> MultiGenerational does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where MultiGenerational or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> MultiGenerational does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 917-971-6155 or via email at [hello@multigenerational.black](mailto:hello@multigenerational.black).

---

**MultiGenerational.Black Inc.**

99 Wall Street, Suite 2223, New York, NY 10023

Phone: 917-971-6155

[www.multigenerational.black](http://www.multigenerational.black)