

## Item 1: Cover Page

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# **Mueller Financial Solutions Co.**

## **Form ADV Part 2A**

### **Investment Adviser Brochure**

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(719) 275-1651  
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March 2023

This Brochure provides information about the qualifications and business practices of Mueller Financial Solutions Co. (“we,” “us,” “our”). If you have any questions about the contents of this Brochure, please contact Jeffrey L. Mueller, President, Chief Executive Officer and Chief Compliance Officer, at (719) 275-1651 or [jeff@them Muellercompanies.com](mailto:jeff@them Muellercompanies.com).

Additional information about our Firm is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). 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.

We are a registered investment adviser. Please note that use of the term “registered investment advisor” and a description of the Firm and/or our employees as “registered” does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

## Item 2: Summary of Material Changes

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### **Annual Update**

In this Item of Mueller Financial Solutions, Co.'s (Mueller or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment.

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

Since the last Annual Amendment filing on March 30, 2022, the Firm has the following Material Changes to report:

- This Form was updated to include information regarding our fiduciary role when providing services to retirement investors and retirement accounts. Please see Item 4: Advisory Business for more information.
- This Form was updated to include disclosure of our conflict of interest related to the financial incentive we have in recommending the transfer of retirement plan assets to accounts that we manage. Please see Item 5: Fees and Compensation for more information.

### **Full Brochure Available**

Mueller's Form ADV may be requested at any time, without charge by contacting Jeffrey L. Mueller, President, Chief Executive Officer and Chief Compliance Officer, at (719) 275-1651 or [jeff@themuellercompanies.com](mailto:jeff@themuellercompanies.com).

Additional information about our Firm is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). 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.

## Item 3: Table of Contents

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Item 1: Cover Page .....	1
Item 2: Summary of Material Changes .....	2
Item 3: Table of Contents .....	3
Item 4: Advisory Business .....	4
Item 5: Fees and Compensation .....	7
Item 6: Performance-Based Fees and Side-by-Side Management .....	11
Item 7: Types of Clients.....	12
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss .....	13
Item 9: Disciplinary Information .....	15
Item 10: Other Financial Industry Activities and Affiliations .....	16
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .	17
Item 12: Brokerage Practices .....	19
Item 13: Review of Accounts .....	21
Item 14: Client Referrals and Other Compensation .....	22
Item 15: Custody .....	23
Item 16: Investment Discretion .....	24
Item 17: Voting Client Securities .....	25
Item 18: Financial Information .....	26
Form ADV Part 2B – Investment Adviser Brochure Supplement.....	27

## Item 4: Advisory Business

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### **Firm Description and Types of Advisory Services**

Mueller is an investment adviser. Mueller provides the following types of investment advisory services: Financial planning services and portfolio management services for individuals. Mueller principally gives advice on, but does not necessarily recommend, all types of securities ranging from government bonds to mutual funds and real estate. Mueller only recommends mutual funds. Most of Mueller's clients are individuals and high net worth individuals. Mueller also works with pension and profit-sharing plans, businesses, charitable organizations, trusts and estates.

### **Principal Owner**

Mueller was founded in 1997 and is owned by Jeffrey L. Mueller, President, Chief Executive Officer and Chief Compliance Officer and Shad Johnson, Investment Adviser Representative.

### **Types of Advisory Services**

#### **Financial Planning and Investment Planning**

Mueller specializes in assisting the client in determining goals and objectives and developing a plan of action to achieve those goals and objectives over the client's appropriate time horizon. Financial planning and investment planning engagements can be freestanding, and Mueller may not be involved in the implementation or monitoring aspects of the portfolio. When retained under those circumstances, Mueller has no responsibility to monitor or review the performance of items the client may or may not select.

Upon completion of a financial or investment planning review, the client may choose to have Mueller assist in the implementation of the plan.

#### **Platinum Asset Management**

Mueller provides Asset Management Services for clients with accounts totaling over \$75,000 using Platinum Asset Management. For Platinum Asset Management Clients, Mueller generally develops a written Investment Policy Statement (IPS) to establish a clear understanding between as to the client's Investment Goals, Objectives and Management Policies for the investment portfolio. The IPS covers the following areas, (as applicable): a review of the client's circumstances, the purpose of the portfolio and its time horizon, portfolio goals, tax considerations, investor goals, investment policy objectives, anticipated liquidity needs, investment philosophy and proposed asset allocation, investment selection, constraints, risk tolerance, monitoring intervals, and portfolio loans.

#### **Model Asset Management**

Mueller provides Asset Management Services for clients with accounts totaling under \$75,000 using Model Asset Management. In Model Asset Management, the client determines an

Allocation Selection (Conservative, MODERATE, Balanced, GROWTH or Aggressive) based upon discussions with Mueller.

### **Tailored Relationships**

Mueller tailors investment advisory services to the individual needs of the client. The goals and objectives for each client are documented in our client relationship management system. Mueller clients can impose restrictions on the investments in their account. Mueller may accept any reasonable limitation or restriction to discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to Mueller in writing.

### **Fiduciary Statement**

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries 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.

We have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. We must take into consideration each client's objectives and act in the best interests of the client. We are prohibited from engaging in any activity that is in conflict with the interests of the client. We have the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances, and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have a reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

Regulations prohibit us from:

- Employing any device, scheme, or artifice to defraud a client;
- Making any untrue statement of a material fact to a client or omitting to state a material fact when communicating with a client;
- Engaging in any act, practice, or course of business which operates or would operate as fraud or deceit upon a client; or
- Engaging in any manipulative act or practice with a client.

We will act with competence, dignity, integrity, and in an ethical manner, when working with clients. We will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

**Wrap Fee Programs**

Mueller does not participate in a Wrap Fee Program.

**Client Assets**

As of December 31, 2022, Mueller manages \$137,276,015 in assets under management. \$132,233,362 is managed on a discretionary basis, and \$5,042,653 is managed on a non-discretionary basis.

## Item 5: Fees and Compensation

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### **Compensation**

Mueller bases its fees on a percentage of assets under management, hourly charges, and fixed fees, as described below.

### **Compensation – Financial Planning**

Fees for financial planning services may be based on an hourly charge of \$125 to \$250 per hour or on a project fee basis (\$500 to \$15,000) depending on the nature and complexity of the project. Fee is due and payable in arrears upon completion of an agreed upon plan of action.

### **Compensation – Asset Management**

#### **Platinum Asset Management – Accounts totaling over \$75,000**

If a client chooses to implement financial planning recommendations through Mueller using Raymond James & Associates (Raymond James) as the custodian, Mueller will design the allocation, complete the paperwork, monitor the portfolio and implement the client's investment program.

<b>Assets Under Management</b>	<b>Annual Fee</b>
First \$200,000	1.50%
Next \$300,000	1.25%
Next \$500,000	1.00%
Over \$1,000,000	0.75%

The fee calculation (including the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the fee was calculated) is presented on the statement from the qualified custodian.

Fees are withdrawn from client accounts quarterly in advance, based on the market value of the account assets under management as of the close of business on the last business day of the previous quarter.

#### **Model Asset Management – Accounts totaling under \$75,000**

If a client chooses to implement financial planning recommendations through Mueller using Raymond James as the custodian, Mueller will design the allocation, complete the paperwork, monitor the portfolio and implement the client's investment program.

**The annual fee, per account, for Model Asset Management (accounts totaling \$75,000 and below) is a flat 1.5%.**

The fee calculation (including the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the fee was calculated) is presented on the statement from the qualified custodian.

Fees are withdrawn from client accounts quarterly in advance, based on the market value of the account assets under management as of the close of business on the last business day of the previous quarter.

#### **Asset Management Using Other Brokers – Accounts totaling over \$75,000**

Mueller monitors client 401k, 457 or 403b programs, etc., as well certain annuities implemented through M.J. Smith and Associates, as described in Item 12. Mueller's services include monitoring of the client's overall portfolio's performance relative to the targets or goals established in their investment policy. These accounts are monitored for a fixed fee based on the percentage of the assets monitored. Mueller's services include monitoring of the client's overall portfolio's performance relative to the targets or goals established in their investment policy.

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
First \$200,000	1.25%
Next \$300,000	1.00%
Next \$500,000	0.75%
Over \$1,000,000	0.50%

For "Other Broker" accounts, clients pay fees directly to Mueller quarterly in arrears, based on the market value of the account assets excluding cash under management as of the close of business on the last business day of the quarter.

#### **Agreement Terms**

For platinum and model clients, a client may terminate the client agreement at any time by notifying Mueller in writing. If the client made an advance payment, Mueller retains the fee for the quarter of termination. For clients, whose assets are at other brokers, or for those cases where the client made a payment in arrears, Mueller will collect any earned yet unpaid fees.

#### **Other Compensation**

Neither Mueller nor any of its supervised persons (employees) accept compensation for the sale of securities or other investment products.

#### **Cash Balances**

Some of your assets may be held as cash and remain uninvested. Holding a portion of your assets in cash and cash alternatives, i.e., money market fund shares, may be based on your desire to have an allocation to cash as an asset class, to support a phased market entrance strategy, to facilitate transaction execution, to have available funds for withdrawal needs or to provide for asset protection during periods of volatile market conditions.



## **Retirement Plan Rollover Recommendations**

As part of our investment advisory services to our clients, we may recommend that clients roll assets from their employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account (collectively, a "Plan Account"), to an individual retirement account, such as a SIMPLE IRA, SEP IRA, Traditional IRA, or Roth IRA (collectively, an "IRA Account") that we will advise on the client's behalf. We may also recommend rollovers from IRA Accounts to Plan Accounts, from Plan Accounts to Plan Accounts, and from IRA Accounts to IRA Accounts.

If the client elects to roll the assets to an IRA that is subject to our advisement, we will charge the client an asset-based fee as set forth in the advisory agreement the client executed with our firm. This creates a conflict of interest because it creates a financial incentive for our firm to recommend the rollover to the client (i.e., receipt of additional fee-based compensation). Clients are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if clients do complete the rollover, clients are under no obligation to have the assets in an IRA advised on by our firm. Due to the foregoing conflict of interest, when we make rollover recommendations, we operate under a special rule that requires us to act in our clients' best interests and not put our interests ahead of our clients'.

Under this special rule's provisions, we must:

- meet a professional standard of care when making investment recommendations (give prudent advice);
- never put our financial interests ahead of our clients' when making recommendations (give loyal advice);
- avoid misleading statements about conflicts of interest, fees, and investments;
- follow policies and procedures designed to ensure that we give advice that is in our clients' best interests;
- charge no more than a reasonable fee for our services; and
- give clients basic information about conflicts of interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, clients should consider the costs and benefits of a rollover. Note that an employee will typically have four options in this situation:

1. leaving the funds in the employer's (former employer's) plan;
2. moving the funds to a new employer's retirement plan;
3. cashing out and taking a taxable distribution from the plan; or
4. rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide clients with

a written explanation of the advantages and disadvantages of both account types and document the basis for our belief that the rollover transaction we recommend is in your best interests.

### **General Information on Compensation and Other Fees**

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low-cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Lower fees for comparable services may be available from other sources.

Advisory fees charged by Mueller are separate and distinct from advisory fees and expenses charged by mutual funds in which client assets may be invested. A complete description of these fees and expenses may be found in each mutual fund prospectus.

In addition to Mueller account fees clients may also incur certain charges imposed by third parties which may include the following: mutual fund or money market 12b-1 and sub transfer fees; fund or money market management fees and administrative expenses; mutual fund transaction fees; IRA and qualified retirement plan fees and other charges required by law. Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

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

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Neither Mueller nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Mueller does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## Item 7: Types of Clients

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### **Types of Clients**

As described in Item 4, Mueller's clients include individuals, high net worth individuals, pension and profit-sharing plans, businesses, charitable organizations, trusts and estates.

### **Account Minimums**

Mueller does not require a minimum account size.

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

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### Methods of Analysis

Mueller employs a fundamental security analysis method. Using fundamental analysis, the Firm attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

### Investment Strategies

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. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy. Strategies may include long-term and short-term purchases.

### Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

**All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risk of loss:**

- **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.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, 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.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

Mueller reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. Mueller may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

## Item 9: Disciplinary Information

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mueller or the integrity of Mueller's management. Mueller has no information to disclose applicable to this Item.

## Item 10: Other Financial Industry Activities and Affiliations

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### **Financial Industry Activities – Broker-Dealers**

Mueller is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

### **Financial Industry Activities – Futures and Commodities**

Neither Mueller nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

### **Financial Industry Activities and Affiliations – Accountant or Accounting Firm**

Jeffrey L. Mueller is President of Mueller & Associates, PC, a certified public accounting firm providing traditional tax and accounting services.

### **Other Affiliations**

Jeffrey L. Mueller also acts as either the Managing Member or General Partner of two Real Estate Investment Liability Companies or Limited Partnerships. These entities represent personal investments with clients. The entities invest in local commercial or residential rental properties. As noted below, in Item 15: Custody, we comply with the SEC's Custody Rule with regard to the custody of the Fund assets; annually the Firm is subject to a Surprise Examination by an independent accountant.

### **Other Investment Advisors**

Mueller does not recommend or select other investment advisors for its clients.



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

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### **Code of Ethics**

Mueller employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Jeffrey L. Mueller, President, Chief Executive Officer and Chief Compliance Officer, reviews all employee trades each quarter. These reviews ensure that personal trading does not affect the markets, and that clients of Mueller receive preferential treatment.

Mueller's employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of Mueller's Code of Ethics by contacting Jeffrey L. Mueller at (719) 275-1651.

### **Participation or Interest in Client Transactions – Personal Securities Transactions**

Mueller and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of Mueller will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Mueller's clients. In addition, the Code requires pre-clearance of many transactions. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics and designed to reasonably prevent conflicts of interest between Mueller and its clients.

**Participation or Interest in Client Transactions – Financial Interest and Principal/Agency Cross**

Mueller and its employees do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest.

Mueller will not affect any principal or agency cross securities transactions for client accounts. Mueller will also not cross trades between client accounts.

## Item 12: Brokerage Practices

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### **Research and Other Soft Dollar Benefits**

Mueller does not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in “Directed Brokerage – Other Economic Benefits”.

### **Brokerage for Client Referrals**

Mueller does not receive client referrals from broker/dealers.

### **Directed Brokerage**

Clients are free to use any broker to implement advice provided by Mueller. Mueller can implement a client investment plan directly through the Investment Advisor Division of Raymond James & Associates on a fee only basis. Additionally, Mueller can implement annuities, C-Shares and other non-fee only investments by utilizing a broker Mueller recommends, M.J. Smith and Associates, Inc. Mueller has selected M.J. Smith and Associates, Inc. based on their cost, skills, reputation, dependability and compatibility.

Mueller, its principals and investment advisor representatives do not share in any of the commissions, transaction fees or service fees that may be received by Raymond James & Associates or M.J. Smith and Associates, Inc.

Clients generally direct Mueller to execute all transactions for the client’s account through a specified broker or dealer (the “Specified Broker”). A client may choose to direct Mueller to execute all transactions through a Specified Broker if, for example, the client will be receiving investment management consulting services from such Specified Broker.

Where a client directs Mueller to effect all transactions for the client’s account through a Specified Broker, Mueller does not negotiate brokerage commissions with respect to transactions executed by the Specified Broker for the client’s account. Rather, the client and the Specified Broker agree on the commission rate that the Specified Broker will charge for transactions effected for the amount. As a result, and depending upon (a) the client’s arrangement with the Specified Broker, (b) such factors as the number of securities, instruments or obligations being bought or sold for the client, whether round or odd lots are being acquired for the client and the market for the security, instrument or obligation, and (c) the fact that the client will be foregoing any benefit from savings on execution costs that Mueller could obtain for its clients through negotiating volume commission discounts on batched transactions, the client may pay higher commissions than those paid by Mueller’s clients who have not directed Mueller to execute transactions through a specified broker or dealer.

In addition, the client may not receive the lowest available price with respect to certain transactions effected for the client’s account. Conflicts may arise between the client’s interest

in receiving best execution on transactions effected for its account and Mueller's interest in receiving future client referrals from the Specified Broker. In its investment management contracts with clients who have directed Mueller to execute transactions through a Specified Broker, Mueller generally requires the client to acknowledge the potential for such conflicts of interest. With full disclosure, Mueller believes that no conflict of interest that is detrimental to the client will result, since through full disclosure, the clients will have the opportunity to determine what is in their best interests.

#### **Directed Brokerage – Other Economic Benefits**

Mueller may have the opportunity to receive traditional "non-cash benefits" from RJFS such as customized statements; receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk servicing RJFS Advisors exclusively; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; ability to have investment advisory fees deducted directly from client accounts; access to an electronic communication network for client order entry and account information; access to mutual funds which generally require significantly high minimum initial investments or those that are otherwise only generally available to institutional investors; reporting features; receipt of industry communications; and perhaps discounts on business-related products.

RJFS may also provide general access to research and perhaps discounts on research products. Any research received is used for the benefit of all clients. Mueller has no written or verbal arrangements whereby it receives soft dollars. While Mueller endeavors at all times to put the interest of the clients first as part of its fiduciary duty, clients should be aware that the receipt of any additional compensation itself creates a conflict of interest and may affect the judgment of these individuals when making recommendations.

Mueller may also receive waivers or reductions of conference registration fees, travel, and promotional premium items that have nominal value. Mueller believes these economic benefits do not, either individually or collectively, impair the Firm's independence. Prior to the acceptance of any consideration, employees must obtain authorization and approval from Jeffrey L. Mueller, President, Chief Executive Officer and Chief Compliance Officer.

#### **Trade Aggregation**

Trade aggregation is the act of trading a large block of a security in a single order. Shares of a purchased security are then allocated to the appropriate accounts in the appropriate proportion. The main purposes of order aggregation are (i) for ease of trading and (ii) to obtain a lower transaction cost associated with trading a larger quantity. Mueller does not aggregate or block trades. As a result, clients purchasing securities around the same time may receive a less favorable price than other clients. In addition, not aggregating trades may result in higher transaction costs, as a client will not benefit from lower transaction cost which might be achieved if the trade was aggregated.

## **Item 13: Review of Accounts**

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### **Reviews**

The day-to-day supervision of the accounts, including monitoring changes in market conditions, is the responsibility of Jeffrey L. Mueller, President, Chief Executive Officer and Chief Compliance Officer. Jeffrey L. Mueller is responsible for communicating with the client, updating changes to the client's situation and regularly reviewing the client's portfolio including the asset allocation and the specific assets included in the account. Shad E. Johnson, Investment Adviser Representative, also reviews accounts. The client review includes comparing the portfolio and current security positions with the goals and objectives as outlined by the Investment Policy Statement, reviewing changes to the client's investment circumstances, evaluating the specific holdings, re-balancing the portfolio and communicating the current status of the portfolio and any recommended actions to the client.

Clients' accounts are reviewed regularly; formal reviews, including contact with clients, typically occur at least 1 time a year.

For Platinum Accounts, the Investment Policy Statement (described in Item 4 above) is an integral part of reviewing accounts and is updated (as necessary) and presented to clients at least annually.

Other factors that would trigger a more frequent review are material market events, political or economic conditions, tax laws, new investment information or changes in a client's personal situation.

### **Reporting**

Clients are provided periodic written summaries of their portfolio, evaluations of their account performance and confirmations of all purchase/sale transactions. Clients also receive detailed monthly or quarterly statements of account activity, holdings and values from custodians.

### **Financial Planning – Reviews and Reporting**

Financial Planning clients will be reviewed and receive reports as contracted for at the inception of the engagement.

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

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### **Other Compensation**

Mueller does not receive any formal economic benefits (other than normal compensation) from any firm or individual for providing investment advice.

### **Compensation – Brokerage**

Mueller may recommend that clients establish brokerage accounts RJFS or M.J. Smith and Associates, Inc., FINRA-registered broker-dealers, members SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although Mueller may recommend that clients establish accounts at either firm, it is the client's decision as to where to custody assets. Mueller is independently owned and operated and not affiliated with RJFS or M.J. Smith and Associates, Inc.

See disclosure in Item 12 regarding compensation, including economic benefits received in connection with giving advice to clients.

### **Compensation – Client Referrals**

Mueller does not make or accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## Item 15: Custody

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### **Custody – Fee Debiting**

Clients may authorize Mueller (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and Mueller. The custodian is advised in writing of the limitation of Mueller's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to Mueller.

### **Custody – First Party Money Transfers**

Clients may provide Mueller with written ongoing authorization to wire money between the client's accounts held with the qualified custodian directly to an outside financial institution (i.e., a client's bank account). A copy of this authorization is provided to the qualified custodian. The authorization includes the client's name and account number(s) at the outside financial institution(s) as required.

### **Custody – Trusteeship**

Mueller or a related person acts as trustee for client trusts. This form of custody is offered on a limited basis. Mueller complies with the SEC's Custody Rule with regard to the custody of the trust assets; annually the Firm is subject to a Surprise Examination by an independent accountant.

### **Custody – Pooled Investment Vehicles**

As described in Item 10 above, Jeffrey L. Mueller acts as either the Managing Member or General Partner of two Real Estate Investment Liability Companies or Limited Partnerships. These entities represent personal investments with clients. The entities invest in local commercial or residential rental properties. Jeffrey L. Mueller does not have check-signing authority over the assets in these entities. Mueller complies with the SEC's Custody Rule with regard to the custody of the Fund assets; annually the Firm is subject to a Surprise Examination by an independent accountant. The custodian sends at least quarterly statements to these pooled investment vehicles.

### **Custody – Account Statements**

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that Mueller provides. Mueller statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

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Mueller may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows Mueller to execute trades on behalf of clients.

When such limited powers exist between Mueller and the client, Mueller has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, Mueller may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to Mueller in writing.

If Mueller has not been given discretionary authority, Mueller consults with the client prior to each trade.



## Item 17: Voting Client Securities

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### **Proxy Voting**

Mueller does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies; clients receive these proxies directly from either custodians or transfer agents.

If requested, Mueller may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact Jeffrey L. Mueller at (719) 275-1651 for information about proxy voting.

## **Item 18: Financial Information**

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Mueller has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Mueller is not required to provide a balance sheet; Mueller does not serve as a custodian for client funds or securities and does not require prepayment of fees of both more than \$1,200 per client, and more than six months in advance.

**Mueller Financial Solutions Co.**  
**Form ADV Part 2B**  
**Investment Adviser Brochure Supplement**

303 North 7th Street  
Canon City, CO 81212  
(719) 275-1651

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

**Supervisor's Name: Jeffrey L. Mueller**

**Supervisor of:**  
Shad E. Johnson

March 2023

This Brochure Supplement provides information about the Firm's ("we," "us," "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact Jeffrey L. Mueller, President, Chief Executive Officer and Chief Compliance Officer, at (719) 275-1651 or [jeff@themuellercompanies.com](mailto:jeff@themuellercompanies.com) if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search this site using a unique identifying number, known as a CRD number for each employee.

## Item 2: Educational Background and Business Experience

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### **Education and Business Background**

Mueller requires that each investment adviser representative have a college degree, industry certifications or equivalent related business experience.

### **Supervised Persons**

***Jeffrey L. Mueller***

Born 1951

**CRD #: 4421457**

### **Business Background:**

Mueller Financial Solutions Co.

1997 to Present

President, Chief Executive Officer and Chief Compliance Officer

Mueller & Associates, P. C.

1997 to Present

President and Chief Executive Officer

### **Formal Education after High School:**

University of Southern Colorado

Bachelor of Science in Accounting

### **Professional Designations:**

Certified Public Accountant / Personal Financial Specialist (CPA/PFS)

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***Shad E. Johnson***

Born 1967

**CRD #: 2471965**

### **Business Background:**

Mueller Financial Solutions Co.

2013 to Present

Investment Adviser Representative

Fintegra, LLC

2009 to 2013

Representative

Sunflower Bank Trust Dept.

2006 to 2013

Trust Officer

### **Formal Education after High School:**

Eastern New Mexico University

Bachelor of Science in Communications

### **Professional Designations:**

N/A

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### **Professional Certifications**

Our Supervised Persons maintain professional designations, which required the following minimum requirements:

<b><i>Certified Public Accountant (CPA)</i></b>	
<b>Issued By</b>	State Boards of Accountancy
<b>Prerequisites</b>	Candidate must meet the following requirements: <ul style="list-style-type: none"><li>• Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA);</li><li>• Successful passing of the Uniform CPA Examination</li></ul>
<b>Education Requirements</b>	At minimum, a college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting)
<b>Exam Type</b>	Uniform CPA Examination
<b>Continuing Education Requirements</b>	Completion of 40 hours of continuing professional education each year (or 80 hours over a two-year period) in order to maintain a CPA license

<b><i>Personal Financial Specialist (PFS)</i></b>	
<b>Issued By</b>	American Institute of Certified Public Accountants (AICPA)
<b>Prerequisites</b>	Candidate must meet the following requirements: <ul style="list-style-type: none"><li>• Must hold an unrevoked CPA license;</li><li>• Fulfill 3,000 hours of personal financial planning business experience;</li><li>• Complete 80 hours of personal financial planning continuing professional education credits;</li><li>• Pass a comprehensive financial planning exam (PFS Exam); and</li><li>• Be an active member of the AICPA</li></ul>
<b>Education Requirements</b>	Must meet minimum education requirements for CPA.
<b>Exam Type</b>	PFS Exam
<b>Continuing Education Requirements</b>	Completion of 60 hours of financial planning continuing professional education credits every three years

### **Item 3: Disciplinary Information**

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Neither Mueller nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

## **Item 4: Other Business Activities**

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As disclosed in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations, Jeffrey L. Mueller is President of Mueller & Associates, PC, a certified public accounting firm providing traditional tax and accounting services.

Jeffrey L. Mueller is a member of two Real Estate Investment Liability Companies or Limited Partnerships. These entities represent personal investments with clients. The entities invest in local commercial or residential rental properties.

## **Item 5: Additional Compensation**

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No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

## **Item 6: Supervision**

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Jeffrey L. Mueller, President, Chief Executive Officer and Chief Compliance Officer, is responsible for supervising Mueller's advisory activities and managing Mueller's team of supervised persons.

Jeffrey L. Mueller supervises these persons by holding regular meetings, which may include staff, investment, compliance and other ad hoc meetings. Jeffrey L. Mueller reviews client reports, emails and trading, as well as personal securities transactions and holdings reports.

Jeffrey L. Mueller may be reached at (719) 275-1651.