wellfin360

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Form ADV Part 2A – Firm Brochure

May 22nd, 2026

This Brochure provides information about the qualifications and business practices of Wellfin360. If you have any questions about the contents of this Brochure, please contact us at 781-460-8118. 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.

Wellfin360 is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about Wellfin360 also is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 329254.

Item 2: Material Changes

Since the last annual filing of this form ADV Part 2 on March 28, 2025, the following material changes have been made to this version of the Disclosure Brochure:

- Item 5: We have updated our fee schedule.

- Item 5: Wellfin360 has added Hourly Financial Planning as a new service offering. Clients may now engage the Advisor on an hourly basis at a rate of $200 per hour for discrete financial planning questions or topics without entering into an ongoing or project-based engagement. This change expands the range of service options available to Clients.

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Item 4: Advisory Business

Description of Advisory Firm

Wellfin360 is an Investment Adviser principally located in the state of Massachusetts. We are a limited liability company founded in May of 2022. Wellfin360 became registered in 2024. Samanda Morales is the principal owner and Chief Compliance Officer (“CCO”).

As used in this brochure, the words “Wellfin360”, "we", "our firm", “Advisor” and "us" refer to Wellfin360 and the words "you", "your" and "Client" refer to you as either a client or prospective client of our firm.

Types of Advisory Services

Wellfin360 is a fee-only investment advisory firm. The only compensation we receive is from our Clients for advisory services. Wellfin360 offers the following services:

- Investment Management Services
- Financial Planning Services
- Educational Seminars / Speaking Engagements

Investment Management Services

Wellfin360 provides continuous investment advisory services to Clients based on each Client’s individual financial circumstances, goals, objectives, risk tolerance, and tax considerations. Through personal discussions with Clients, Wellfin360 develops an investment policy and/or investment plan with an asset allocation target and manages portfolios in a manner consistent with the Client’s stated objectives (e.g., capital appreciation, growth, income, or a combination thereof).

Wellfin360 primarily provides advice regarding investments in mutual funds, exchange-traded funds (“ETFs”), and cash and cash equivalents. At a Client’s request, Wellfin360 may also provide advice regarding securities held at the inception of the advisory relationship or other investment types not listed above.

When providing Investment Management Services, Clients grant Wellfin360 discretionary authority to buy and sell securities in their accounts without obtaining prior approval for each transaction. Additional information regarding investment discretion is described in Item 16 of this Brochure. Clients may impose reasonable restrictions on investing in certain securities, asset classes, or industry sectors, provided such restrictions are communicated to Wellfin360 in writing.

Wellfin360 provides investment management services directly to Clients and may also utilize unaffiliated third-party investment advisers, model providers, or investment solutions when appropriate, as described below.

XY Investment Solutions ("XYIS")

XY Investment Solutions, LLC, CRD No. 285967 ("XYIS"), an unaffiliated SEC-registered investment adviser, constructs and manages investment models ("Model Portfolios'') through a technology solution. XYIS supports investment advisers with investment strategies based on research, experience, and sound rationale. XYIS manages its Model Portfolios on a discretionary basis primarily by allocating Client assets among various mutual funds and exchange-traded funds ("ETFs''). XYIS may also allocate Client assets in individual debt and equity securities. XYIS' services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. While XYIS will buy and sell securities for the Model Portfolios, Wellfin360 is responsible for choosing the specific model and allocation on behalf of Clients.

Not all Clients will utilize XYIS investment models. The use of XYIS is dependent upon the Client's circumstances, objectives, custodial platform availability, and the Advisor's determination of suitability.

Financial Planning Services

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written report, providing the Client with a detailed financial plan designed to help achieve the Client's stated financial goals and objectives.

In general, the financial plan will address some or all of the following areas of concern. The Client and Wellfin360 will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

Financial planning services involve an evaluation of a Client's current and anticipated future financial condition using currently known variables to develop strategies related to cash flow, assets, liabilities, and long-term objectives. A defining aspect of financial planning is that all relevant financial information is considered in relation to the Client's overall financial and life circumstances.

Clients who engage Wellfin360 for Financial Planning Services may receive written planning materials or reports designed to address the Client's stated goals and objectives.

Financial planning services may address some or all of the following areas, as agreed upon between the Client and Wellfin360:

- Business planning considerations
- Cash flow and debt management
- College savings planning
- Employee benefits analysis
- Estate planning considerations (coordination only; no legal services provided)
- Financial goal identification and prioritization

- Insurance and risk management considerations
- Investment analysis and asset allocation education
- Retirement planning
- Tax planning strategies

Wellfin360 does not provide legal or tax preparation services. Clients are encouraged to consult with qualified legal and tax professionals prior to implementing related strategies.

Financial Planning Services are offered on both an ongoing basis and a project-based basis.

Ongoing Financial Planning

Ongoing Financial Planning involves working one-on-one with a financial planner over an extended period of time. Clients are expected to collaborate with the planner to develop and assist in the implementation of their financial plan. Wellfin360 monitors the plan and may recommend changes as the Client's circumstances, goals, or objectives evolve.

Wellfin360 offers Ongoing Financial Planning through the following service levels:

Service Level	Description
Emerging Professionals	This service level is designed for early-career individuals and young professionals seeking ongoing financial planning support focused on establishing foundational financial structure. Services under this plan may include cash flow and budgeting analysis, debt management considerations, savings and emergency fund planning, retirement account education, employee benefits review, goal identification and prioritization, and general investment education. The scope of services is tailored to the Client's circumstances and may evolve over time as the Client's financial situation changes.
Growing Families and Mid-Career Professionals	This service level is designed for individuals and households experiencing increased financial complexity, such as growing families or mid-career professionals. Services under this plan may include ongoing cash flow and savings planning, retirement planning, investment analysis, insurance and risk management considerations, education funding strategies, tax planning strategies, and coordination of multiple financial goals.

Service Level	Description
	The scope and depth of services are based on the Client's needs, complexity, and planning priorities, and are reviewed periodically as circumstances evolve.
Business Owners and Self-Employed Professionals	Ongoing financial planning that considers both personal and business-related financial considerations. Services may include analysis and planning related to business cash flow, compensation planning, tax planning strategies, and coordination of personal and business financial goals.

Project-Based Financial Planning

Wellfin360 offers Project-Based Financial Planning through a limited-scope, one-time engagement delivered as a Comprehensive Financial Plan. This service is designed for Clients seeking assistance with specific financial planning questions, transitions, or objectives without entering into an ongoing advisory relationship.

Under this engagement, Wellfin360 works with the Client to identify the scope of planning to be addressed. Project-Based Financial Planning may include, but is not limited to, analysis and recommendations related to cash flow and debt management, retirement planning, investment allocation considerations, insurance and risk management review, education funding strategies, tax planning strategies, business or compensation planning considerations, and coordination of multiple financial goals. The specific topics covered are determined by mutual agreement between the Client and Wellfin360 and are documented in the Client's Advisory Contract.

As part of the engagement, Wellfin360 is responsible for obtaining and analyzing relevant qualitative and quantitative information necessary to understand the Client's financial circumstances, developing planning assumptions, and presenting planning observations and recommendations consistent with the agreed-upon scope. Clients may receive written planning materials or a written financial plan summarizing the analysis and recommendations. Implementation of recommendations is the responsibility of the Client unless otherwise agreed upon in writing.

Educational Seminars / Speaking Engagements

Wellfin360 offers educational seminars and speaking engagements to organizations, employers, nonprofits, educational institutions, and the general public on a variety of personal finance and financial literacy topics. These engagements are educational in nature only and are not intended to provide individualized investment advice, financial planning advice, or recommendations tailored to any specific participant.

Topics covered during educational seminars may include, but are not limited to, general financial planning concepts, budgeting and cash flow management, debt management strategies, savings and retirement planning concepts, employee benefits education, basic investing principles, risk management and insurance concepts, and financial wellness education. The specific subject matter, scope, and format of each seminar are determined in advance by mutual agreement between the Client and Wellfin360.

Information presented during seminars is general in nature and does not take into account the individual financial circumstances, objectives, or risk tolerance of any attendee. Wellfin360 does not review individual financial situations, provide personalized recommendations, or manage assets for seminar participants as part of these engagements. Attendees are encouraged to seek individualized advice through a separate advisory engagement if appropriate.

Educational seminars may be delivered in a virtual or in-person format and may be structured as a single presentation, workshop, panel discussion, or multi-session program, depending on the needs of the engaging organization.

Client Tailored Services and Client Imposed Restrictions

Wellfin360 tailors advisory services to meet the individual needs of Clients. Clients may impose reasonable restrictions on investment recommendations or planning considerations by providing written instructions to Wellfin360. Wellfin360 will notify Clients if any requested restriction cannot be accommodated.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

As of December 31st, 2025, Wellfin360 has $977,901 in discretionary and $586,718 in non-discretionary assets under management.

Item 5: Fees and Compensation

All advisory fees charged by Wellfin360 are subject to negotiation. Fee determinations are based on factors including, but not limited to, the scope of services provided, the complexity of the Client's financial situation, estimated time commitment, and the resources required to deliver services. Any fee arrangement agreed upon between Wellfin360 and the Client will be documented in the Client's Advisory Contract. No increase to the agreed-upon fees will occur without prior Client consent.

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior client consent.

Investment Management Services

The fee is based on a percentage of assets under management and is negotiable. The annualized fees for investment management services are based on the following fee schedule:

Assets Under Management	Annual Advisory Fee
$0 - $250,000	1.00%
$250,001 - $500,000	0.90%
$500,001 - $1,000,000	0.80%
$1,000,001 - $5,000,000	0.70%
$5,000,001 - $10,000,000	0.60%
$10,000,001 - $20,000,000	0.50%
$20,000,001 and Above	0.45%

The annual advisory fee is paid monthly in arrears based on the value of Client's account(s) as of the last day of the billing period. The advisory fee is a straight tier. For example, for assets under management of $2,000,000, a Client would pay 0.70%. The monthly fee is determined by the following calculation: ($2,000,000 x 0.70%) ÷ 12 = $1,166.67. The annual advisory fee is paid monthly in arrears based on the value of the Client's account(s) as of the last day of the billing period. Where Client assets are managed using an unaffiliated third-party investment adviser or investment platform, fees may be deducted by the third party in accordance with applicable agreements.

In addition to Wellfin360's advisory fee, Clients also bear the internal fees and expenses of mutual funds and exchange-traded funds (including Dimensional Fund Advisors funds, where applicable). These fees are separate from and in addition to Wellfin360's advisory fee and are disclosed in the applicable fund prospectus.

In determining the advisory fee, we may allow accounts of members of the same household to be aggregated. Wellfin360 relies on the valuation as provided by Client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods. Clients may make additions or withdrawals from their account at any time; however, Wellfin360 reserves the right to adjust our advisory fees on a pro-rata basis on account of any such cash-flow transactions.

Ongoing Financial Planning

Wellfin360 offers Ongoing Financial Planning services through tiered service levels designed to address a Client's planning needs and level of financial complexity. Fees are charged as a recurring fixed monthly fee and are paid monthly in arrears. Fees are negotiable and based on factors including, but not limited to, the Client's financial complexity, scope of services, estimated time commitment, and resources required to deliver services.

Ongoing Financial Planning services are offered under the following service levels:

Service Level	Description	Monthly Fee
Emerging Professionals	Ongoing financial planning for early-career individuals and young professionals focused on establishing financial structure.	$120 - $150
Growing Families and Mid-Career Professionals	Ongoing financial planning for individuals and households with increased financial complexity.	$220 – $400
Business Owners and Self-Employed Professionals	Ongoing financial planning that considers both personal and business-related financial considerations. Services may include analysis and planning related to business cash flow, compensation planning, tax planning strategies, and coordination of personal and business financial goals.	$500-$750*

*Fees are higher due to increased financial complexity and are determined based on the scope and complexity of services provided.

Project-Based Financial Planning (Focused Planning Project)

We charge a fixed fee of $1,500 to $3,000 for a Comprehensive Financial Plan. The fee is based on variables including, but not limited to, the Client's specific needs, complexity, estimated time, research, and resources required to provide the services. Fees are negotiable, and the final agreed-upon fee will be set forth in the Client's Advisory Contract.

Wellfin360 collects one-half (50%) of the project fee in advance, with the remaining balance due upon completion of the services (or as otherwise specified in the Advisory Contract). Wellfin360 will not require prepayment of $500 or more than six (6) months in advance of rendering the services.

Hourly Financial Planning

Wellfin360 offers financial planning services on an hourly basis for Clients who prefer to engage the Advisor for specific questions or discrete financial planning topics without entering into an ongoing or project-based engagement. The hourly rate is $200 per hour. Fees are negotiable, and the final agreed-upon fee will be set forth in the Client's Advisory Contract.

An estimate of the total hours required will be provided to the Client prior to engaging these services. Wellfin360 will invoice the Client for actual hours worked. Payment is due upon receipt of the invoice.

Educational Seminars / Speaking Engagements

Wellfin360 offers educational seminars and speaking engagements to organizations and the public on a variety of financial topics. Fees range from $2,500 to $5,000 per seminar, or $75 to $150 per participant, subject to a minimum fee of $1,500 per engagement.

The applicable fee is based on factors including, but not limited to, the subject matter, level of customization, amount of research conducted, number of preparation hours required, delivery format, and number of attendees. Fees are negotiable, and the final agreed-upon fee will be outlined in the Client's Advisory Contract.

Wellfin360 collects one-half (50%) of the agreed-upon fee in advance, with the remaining balance due at the conclusion of the seminar.

Seminars may be delivered in a virtual or in-person format. If travel is required, both parties will agree in advance to the applicable travel terms, including costs related to transportation, lodging, and other reasonable travel expenses.

Fee Payment

For Investment Management services, we deduct our advisory fee from one or more account(s) held at an unaffiliated third-party custodian, as directed by the Client. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Clients may also pay by electronic funds transfer (EFT). We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments. Clients can also have their managed accounts directly debited. When an Outside Manager is used, the Outside Manager will debit the Client's account for both the Outside Manager's fee, and Wellfin360's's advisory fee.

For Financial Planning services and Educational Seminars / Speaking Engagements, fees are paid by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending custodians for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

Clients may incur fees from third-party professionals such as accountants and attorneys that Wellfin360 may recommend, upon Client request. Such fees are separate and distinct from Wellfin360's advisory fees.

Terminations and Refunds

For Investment Management services the Advisory Contract may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination.

For Ongoing Financial Planning services, the Advisory Contract may be terminated with written notice at least 30 calendar days in advance. In the event of early termination prior to the initial plan being delivered, fees will be prorated and any unearned fees will be refunded to the Client. Since ongoing fees are paid in arrears, no refund will be needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination, based on the percentage of work completed by the Advisor.

For Project-Based Financial Planning services, this service is not an ongoing engagement, thus upon receipt of the final fees, the Advisory Contract will automatically be terminated. Clients may terminate at any time provided written notice. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of the Advisory Contract for any unearned fee.

For Hourly Financial Planning services, either party may terminate the engagement at any time with written notice. Clients will be responsible for payment of fees for actual hours worked up to the date of termination. No refund will be owed for hours already rendered.

For Educational Seminars and Speaking Engagements, Advisor or Clients may cancel the event with 30 days' advance written notice. Should the Client cancel the event within 30 days of the event (with the exception of weather or similar unforeseen causes), the Client will be responsible for reimbursement of any non-refundable travel expenses already incurred and a prorated fee for any work conducted in preparation of the event, based on the percentage of work done and the flat fee agreed upon by both parties.

Sale of Securities or Other Investment Products

Advisor and its supervised persons do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning and investment management services to individuals, high net-worth individuals, charitable organizations, or other small businesses.

We do not have a minimum account size requirement.

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

Below is a brief description of our methods of analysis and primary investment strategies or when we provide securities recommendations in the context of a financial plan.

Methods of Analysis

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical analysis involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

Use of Outside Managers: Wellfin360 may utilize unaffiliated third-party investment advisers or advisory programs ("Outside Managers") in certain Client accounts. Our analysis of Outside Managers involves the examination of the experience, expertise, investment philosophies, and past performance of the Outside Managers in an attempt to determine if that Outside Manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the Outside Manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the Outside Manager's compliance and business enterprise risks. A risk of investing with an Outside Manager who has been successful in the past is that they may not be able to replicate that success in the future. In addition, we do not control the underlying investments in an Outside Manager's portfolio. There is also a risk that an Outside Manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the Outside Manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Investment Strategies

Asset Allocation

In implementing our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. We attempt to closely monitor our asset allocation models and make changes periodically to keep in line with the target risk tolerance model.

Passive Investment Management

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Long-term/Short-term purchases

We purchase securities and generally hold them in the Client's account for a year or longer. Short-term purchases may be employed as appropriate when:

- We believe the securities to be currently undervalued, and/or

- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: Actively managed mutual funds tend to have a higher turnover rate than passive funds. A high portfolio turnover would result in higher transaction costs and in higher taxes when shares are held in a taxable account. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value and an ETF purchased at a premium may ultimately be sold at a discount; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Mutual Funds When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

Wellfin360 and its management persons have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Wellfin360 and its management persons have not been involved in any administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Wellfin360 and its management persons have not been involved in any self-regulatory organization (SRO) proceeding.

Clients can obtain the disciplinary history of Wellfin360 or any of its representatives from the Massachusetts Securities Division upon request by calling (617) 727-3548.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Neither Wellfin360 or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Affiliations

Neither Wellfin360 or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Related Persons

Neither Wellfin360 or its management persons have any relationship or arrangement with any outside financial industry related parties.

Recommendations or Selections of Other Investment Advisers

From time to time, we may recommend or utilize unaffiliated third-party investment advisers, model providers, and/or platform solutions (e.g., XY Investment Solutions) as part of delivering our advisory services. We remain responsible for the selection and monitoring of these solutions as described in Item 4.

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

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings.

Code of Ethics Description

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- ⇒ **Integrity** - Access persons shall offer and provide professional services with integrity.
- ⇒ **Objectivity** - Access persons shall be objective in providing professional services to Clients.
- ⇒ **Competence** - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- ⇒ **Fairness** - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- ⇒ **Confidentiality** - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- ⇒ **Professionalism** - Access persons conduct in all matters shall reflect the credit of the profession.
- ⇒ Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons' transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by Wellfin360"s Chief Compliance Officer in advance of the transaction in an account. Wellfin360 maintains a copy of access persons' personal securities transactions as required.

Trading Securities At/Around the Same Time as Client's Securities

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients' accounts in the purchase or sale of securities.

Item 12: Brokerage Practices

Factors Used to Select Custodians

Wellfin360 does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

With this in consideration, our firm recommends Charles Schwab and Altruist Financial LLC, as independent and unaffiliated SEC registered broker-dealer firms and members of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC").

Research and Other Soft-Dollar Benefits

We do not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Charles Schwab and Altruist Financial LLC may provide us with certain services that may benefit us.

Charles Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or

its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

1. **Services that benefit you.** Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.

2. **Services that may not directly benefit you.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
    - provide access to Client account data (such as duplicate trade confirmations and account statements)
    - facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
    - provide pricing and other market data
    - facilitate payment of our fees from our Clients' accounts
    - assist with back-office functions, recordkeeping, and Client reporting

3. **Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
    - Educational conferences and events
    - Consulting on technology, compliance, legal, and business needs
    - Publications and conferences on practice management and business succession

4. **Your brokerage and custody costs.** For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

Altruist

Wellfin360 offers investment advisory services through the custodial platform offered by Altruist Financial LLC, an unaffiliated SEC-registered broker-dealer and FINRA/SIPC member ("Altruist"). Wellfin360's Clients establish brokerage accounts through Altruist. Wellfin360 maintains an institutional relationship with Altruist whereby Altruist provides certain benefits to Wellfin360, including a fully digital account opening process, a variety of available investments, and integration with software tools that can benefit Wellfin360 and its Clients.

Brokerage for Client Referrals

We receive no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

Our firm recommends Clients establish account(s) at Charles Schwab and Altruist to execute transactions through. We will assist with establishing your account(s) at Charles Schwab Altruist Financial LLC however, we will not have the authority to open accounts on the Client's behalf. Not all investment advisers require their Clients to use their recommended custodian. By recommending that Clients use Charles Schwab Altruist Financial LLC, we may be unable to achieve most favorable execution of Client transactions, and this practice may cost Clients more money. We base our recommendations on the factors disclosed in Item 12 herein and will only recommend custodians if we believe it's in the best interest of the Client.

If Clients do not wish to utilize our recommended custodian, we permit Clients to direct brokerage. We will be added to your account through a limited trading authority. However, due to restraints from not having access to an institutional platform, we are unable to achieve most favorable execution of Client transactions. Clients directing brokerage may cost Clients more money. For example, in a directed brokerage account, the Client may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or the Client may receive a higher transaction price at their selected custodian versus our recommended custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or access persons may participate in block trading with your accounts; however, they will not be given preferential treatment.

Outside Managers used by Wellfin360 may block Client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13: Review of Accounts

Periodic Reviews

Samanda Morales, CEO and CCO of Wellfin360, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. Clients who engage us for investment management services will have their account(s) reviewed regularly on a quarterly basis by Samanda Morales, CEO and CCO. The account(s) are reviewed with regards to the Client's investment policies and risk tolerance levels.

Triggers of Reviews

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Review Reports

Clients will receive trade confirmations from the custodian(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Wellfin360 does not provide written performance or holdings reports to Investment Management Clients outside of what is provided directly by their custodian.

Item 14: Client Referrals and Other Compensation

Compensation Received by Wellfin360

Wellfin360 is a fee-only firm that is compensated solely by its Clients. Wellfin360 does not receive commissions or other sales-related compensation. Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

Client Referrals from Solicitors

Wellfin360 does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

Wellfin360 does not hold, directly or indirectly, Client funds or securities, or have any authority to obtain possession of them. All Client assets are held at a qualified custodian.

If Wellfin360 deducts its advisory fee from Client's account(s), the following safeguards will be applied:

i. The Client will provide written authorization to Wellfin360, permitting us to be paid directly from Client's accounts held by the custodian.
ii. The custodian will send at least quarterly statements to the Client showing all disbursements from the accounts, including the amount of the advisory fee.

In jurisdictions where required, Wellfin360 will send an itemized invoice to the Client at the same time it instructs the custodian to debit the advisory fee. Itemization includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

We urge you to carefully review custodial statements and compare them to the account invoices or reports that we may provide to you and notify us of any discrepancies. Clients are responsible for verifying the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility. Our invoices or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

For those Client accounts where we provide Investment Management Services, Wellfin360 has discretionary authority and limited power of attorney to determine the securities and the amount of securities to be bought or sold for a Client's account without having to obtain prior Client approval for each transaction. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account(s). Additionally, the discretionary relationship will be outlined in the Advisory Contract and signed by the Client. Clients may limit our discretion by requesting certain restrictions on investments. However, approval of such requests are at the firm's sole discretion.

If Wellfin360 engages an unaffiliated third-party investment adviser, model provider, or investment program to assist in implementing a Client's investment strategy, Wellfin360 may have the discretion to direct such manager to buy or sell securities consistent with the Client's objectives, restrictions, and the terms of the applicable Advisory Contract and account documentation.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than $500 in fees six months or more in advance.

Item 19: Requirements for State-Registered Advisers

Principal Officers

Samanda Morales serves as Wellfin360's sole principal and CCO. Information about Samanda Morales's education, business background, and outside business activities can be found in her ADV Part 2B, Brochure Supplement attached to this Brochure.

Outside Business

All outside business information, if applicable, of Wellfin360 is disclosed in Item 10 of this Brochure.

Performance-Based Fees

Neither Wellfin360 nor Samanda Morales is compensated by performance-based fees.
Please refer to Item 6 of this brochure.

Material Disciplinary Disclosures

No management person at Wellfin360 has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Wellfin360 nor Samanda Morales have any relationship or arrangement with issuers of securities.

Form ADV Part 2B – Brochure Supplement

May 22nd, 2026

For

Samanda Morales

CEO and Chief Compliance Officer

This brochure supplement provides information about Samanda Morales that supplements the Wellfin360 ("Wellfin360") brochure. A copy of that brochure precedes this supplement. Please contact Samanda Morales if the Wellfin360 brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Samanda Morales is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 7839891.

Item 2: Educational Background and Business Experience

Samanda Morales
Born: 1977

Samanda Morales brings over 23 years of financial services experience, combining deep institutional expertise with entrepreneurial leadership and a commitment to comprehensive financial planning.

Her career foundation includes 19 years at Bank of New York Mellon, where she developed expertise in complex financial structures, accounting services, and institutional operations. Prior to BNY Mellon, she served as a Trust Officer at State Street Bank, specializing in mutual fund custody and accounting. This institutional background provides her with unique insight into fiduciary responsibility, accounting strategies, and sophisticated financial management—expertise she now applies to serving individuals, families, and business owners through Wellfin360.

As an entrepreneur, community leader, and Chair of the Board of Trustees at Salem State University, Samanda understands the financial complexities professionals face when balancing personal wealth building with business ventures and career transitions.

Educational Background

- Present - CFP, American College of Financial Services
- 2024 - AFCPE, Association for Financial Counseling & Planning Education
- 2023 - LEADS Fellowship and Leadership Program, Harvard Business School
- 2021 - Intuit Academy Bookkeeping Specialization, Intuit Booking
- 2020 - CPFWC/CFEI, National Financial Educators Council
- 1998 - BS in Business Administration, Salem State College

Business Experience

- 02-2025 – Present, 360 Business Solutions LLC, Owner
- 05/2022 - Present, Wellfin360, CEO and CCO
- 05/2022 – Present, Salem State University, Chair of Board of Trustees
- 02/2020 - Present, Ahora Inc, Co Founder and CEO
- 11/2019 - 12/2020, MBS LLC, Business Consultant
- 01/2016 - 11/2019, Bank of NY Mellon, Project Manager - Accounting Services
- 01/2006 - 12/2015, Bank of NY Mellon, Associate - Daily Valuation & Implementation Group
- 10/2001 – 10/1/2005, Bank of NY Mellon, Trust Officer – Valuation & Accounting Group

Professional Designation(s)

Accredited Financial Counselor® (AFC) is a certification offered by the Association for Financial Counseling and Planning Education (AFCPE), aimed at professionals dedicated to helping individuals and families enhance their financial well-being. AFC professionals specialize in several core areas: they provide comprehensive financial education to help clients grasp complex financial concepts and apply them to their

personal situations; guide clients in managing and reducing debt through strategies tailored to individual needs; assist in creating and maintaining budgets that support achieving financial goals while ensuring daily financial stability; and encourage effective savings habits, aiding clients in planning for significant future expenditures like education, retirement, or major purchases. This certification equips professionals with the tools to offer substantial support and guidance in various aspects of financial management.

Certified Personal Financial Wellness Consultant℠ (CPFWC℠) A Certified Personal Financial Wellness Consultant℠ (CPFWC℠) is a professional who has demonstrated expertise in enhancing personal financial wellness through rigorous training provided by the National Financial Educators Council (NFEC). Upon earning their certification, CPFWCs are exceptionally qualified to engage in a broad range of activities aimed at improving the financial health of individuals and communities alike.

The CPFWC℠ program is designed to meet the highest educational standards, ensuring that all consultants not only receive comprehensive training but also practical experience in financial coaching. This hands-on approach is integral to developing effective, real-world financial consulting skills.

Certified Financial Education Instructor – Financial Literacy Certification (CFEI) The NFEC's Certified Financial Education Instructor program helps individuals acquire the expertise, credibility, and self-assurance they need to teach money management lessons effectively. Those that earn the CFEI financial literacy certification report that they experience greater enjoyment teaching and achieve better results among the audiences who attend their presentations.

The CFEI coursework meets standards for the highest academic rigor while providing practical lessons that increase your impact as a financial educator. You will develop skills and learn techniques that help you motivate, engage, and move participants of all ages to take positive financial action.

Graduation from the NFEC's financial literacy certification program demonstrates that you are qualified to teach the subject matter and increases your credibility as a financial education instructor. Graduates of the coursework take their place among the most highly-qualified personal finance educators in the nation, with proven ability to teach essential money management concepts effectively to people of all ages.

Item 3: Disciplinary Information

Samanda Morales has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Samanda Morales is the Co-Founder and CEO at Ahora Inc. Ahora Inc. is a mission-oriented non-profit organization that empowers low-income individuals through financial coaching and literacy. As the co-founder and CEO, Ms. Morales contributes by presenting strategic approaches to boost and foster donor and community engagement. Moreover, as a certified personal finance education instructor, she has facilitated personal finance workshops in diverse communities, such as Lynn, Salem, and Boston. She dedicates 3-4 hours per week to this activity. This is not investment related and does not pose a conflict of interest.

Samanda Morales is Owner of 360 Business Solutions LLC, a company providing business consulting and Fractional CFO services. She dedicates approximately 20 hours per week to this activity (7 hours per week during trading hours). This is not investment related and does not pose a conflict of interest.

Item 5: Additional Compensation

Samanda Morales does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through Wellfin360.

Item 6: Supervision

Samanda Morales as Chief Compliance Officer of Wellfin360, supervises the advisory activities of our firm. Samanda Morales is bound by and will adhere to the firm's policies and procedures and Code of Ethics. Clients may contact Samanda Morales at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Samanda Morales has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.