

Firm Brochure

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Mullennium Finance, LLC. Being registered as a registered investment advisor does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at: 435-655-0508, or by email at: Bill@BillMullen.org. 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.

A copy of this Firm Brochure will be given to every client and prospect.

Additional information about Mullennium Finance, LLC. is available on the SEC's website at www.adviserinfo.sec.gov

February 1, 2018

Item 2: Material Change

Annual Update

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

Material Changes since the Last Update

This update is in accordance with the required annual updates for Registered Investment Advisors in 2017 for ADV dated 1/2/2018.

Cover Page: Statement is added that this brochure will be given to all clients and prospects. In addition, the ADV Part 2 will be given to all clients and prospects.

Item 5 page 5: Fees and Compensation: Consultation & Financial Services: Hourly fees have been reduced to \$150. Minimum fee for financial plan is explained with an example. Return of excess fees explained when projects are completed in less time than quoted. There is no charge for annual reviews for financial plans in the first three years. Calculations for fees for money under management with Matson Money are explained & an example is given so that a client can calculate their fees. Credit for prorate fees is explained and an example is given so that client can calculate their credit. It is stated that there is no fee for periodic reviews of funds under management. Clients are made aware of where in their quarterly statements to find their fee schedule and fees for the upcoming quarter. Prorate credit for any previously charged fees are listed separately. Statement is made that invoices are not sent separately but fees are clearly stated on every quarterly statement from Matson Money. It is also stated that Matson Money does not charge a separate fee.

Item 11 Page 14: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading: Clarified that a copy of the Code of Ethics will be given to any client or prospect.

Part 2B Form ADV page 21: Requirements for State Registered Advisors. Complaint from November 2008 is clarified. Also the rights of all clients under Utah law are summarized.

Full Brochure Available

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

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Form ADV – Part 2A – Firm Brochure

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Item 4: Advisory Business

Firm Description

Mullennium Finance, LLC (“Advisor”) has been registered as an Investment Advisor since its original registration with the State of Utah in October of 2007. William T. Mullen is 100% owner.

Advisor solicits for third party money managers and personalized confidential financial planning and to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Advisor is a fee based financial planning and advisory firm. The Managing Member is a licensed insurance agent and may offer insurance products as well as tax planning services for a fee to clients.

Advisor does not act as a custodian of client assets.

Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed.

Types of Advisory Services

Advisor furnishes financial planning and investment advice through consultations and is a solicitor for third party money managers.

On more than an occasional basis, Advisor furnishes advice to clients on matters not involving securities, such as taxation issues and trust services that often include estate planning.

PENSION CONSULTING SERVICES

Mullennium Finance is available to provide advice to pension plans and their trustees. As a fee-based Advisor, Mullennium Finance can provide an independent review and consultation with respect to such matters as: (1) identifying investment objectives and restrictions; (2) assistance with design, construction, custodial selection, and investment selection; (3) allocating plan assets to various objectives; (4) selecting money managers to manage plan assets in ways designed to achieve objectives; (5) selecting mutual funds that plan participants can choose as their funding vehicles; and (6) monitoring performance of money managers and mutual funds using parameters established in the investment policy or similar document, and making recommendations for changes as deemed appropriate.

GENERAL CONSULTATION SERVICES

Mullennium Finance is available to provide Consultation Services on an hourly or project basis (based on hours and effort). Consultation Services can be helpful to address general issues relating to investments, portfolios, or other issues of interest to clients. The Advisor can tailor services as desired by the client. Where Consultation Services are not comprehensive in nature or focus only on certain areas of client interests, needs or is otherwise limited, clients must understand that a client's overall financial and investment needs and objectives may not be considered as a result of time and/or service restraints placed on the Advisor's services. Services terminate upon the delivery of services unless otherwise agreed in the Client Agreement. The advice provided by the Advisor may include recommendations for updates and reviews and the client's responsibility to follow-up and secure additional services under a new or amended agreement. Clients are welcome to implement advice and recommendations in whole or in part, if desired, via the financial or insurance provider of their choice.

FINANCIAL PLANNING SERVICES

The Advisor is available to provide Financial Planning Services on an hourly or project basis (based on hours and effort). This service is included for clients with investible assets of \$100k or more that are receiving the Advisor's Investment Management Services. Advice may be provided on financial and cash management, risk management, financial issues relating to divorce or marital issues, estate planning, tax issues, retirement planning, educational funding, goal setting, or other needs as identified by the client. The Advisor may offer comprehensive planning services or the client may desire advice on certain planning components. The Advisor can tailor services as desired by the client.

The first step in the planning process is the client will complete a 12 page Confidential Data Form. Upon completion of the form, the Advisor meets with the client and reviews the data. If after the review, it is determined that the Advisor can be of assistance, the Advisor will prepare a project outline and a Client Agreement for the proposed project.

The Advisor generally utilizes Money Tree Silver for financial planning. The Money Tree Silver is a software program that provides the basis of a one-time financial plan which can provide clients with a snapshot view of their current financial status in relation to their stated future goals. The plans prepared normally contain detailed suggestions for greater strategic and economic efficiencies and can be used as a helpful resource to assist clients in achieving their stated financial and personal goals. In preparing plans the Advisor and client may give more weight to lifestyle planning rather than simply creating the static numbers relating to how much a person may need to set aside to achieve a certain goal. Therefore, in many cases, the emphasis of planning revolves around not what the goals are but identification of and discussions as to why the stated goals are important to the client.

In the Advisor's experience, its approach to planning adds two tremendously valuable aspects to the traditional financial planning model. First, many times the clients themselves have not taken a hard look at what is really important to them. They may have an idea of what they want but have never really sat down to analyze what makes it so important to them. As clients better understand the "whys", they may gain more passion about accomplishing their stated goals. Thus, the financial planning process becomes more to them than just saving or investing for an unknown future. Secondly, the process helps the Advisor understand the client's stated desires and goals at a greater depth. As plans are formulated they become more individualized and less "canned", therefore the ability for the Advisor to help and guide the client is tremendously enhanced.

Money Tree Silver also adds another very unique feature that sets it apart from most traditional financial planning models in that the plans are not prepared within the static vacuum of a single professional discipline. Rather than having the Advisor alone completing the entire plan, the Advisor reviews the basic content with other professionals from the accounting and legal professions to give input, to temper, and help make unified recommendations designed to balance the benefits and structures of all three professional views as it relates to the specific client's stated needs. (non-public personally identifiable information is not shared with unaffiliated professionals without the client's prior approval). Having all three professions making recommendations in a unified effort rather than each providing advice independently and leaving the client to try to rectify the differences that frequently occur, provides a great resource and benefit to clients.

When Financial Planning Services only focus on certain areas of client interests, needs or is otherwise limited, clients must understand that a client's overall financial and investment needs and objectives may not be considered as a result of time and/or service restraints placed on the Advisor's services. Clients requiring assistance on issues relating to matters outside of investment advisory topics should consult their personal tax adviser, legal counsel, or other professionals for expert opinions. When providing plan-related services, the advice and recommendations (in addition to plan service providers) are limited to plan offerings.

The advice provided by the Advisor may include recommendations for updates and reviews.

Implementation of any advice or recommendations pertaining to non-securities matters (such as insurance), in whole or in part, is entirely at the client's discretion via the service provider(s) of the client's choice.

Mullennium Finance can also provide a review of existing plans prepared by the Advisor (annually or as the client requests) in order to review their then-current financial condition, stated goals and risk tolerance.

SOLICITOR FOR OTHER INVESTMENT ADVISORS

When deemed suitable, the Advisor will recommend the services of Matson Money as a third party unaffiliated Independent Manager. Clients who invest with Matson Money ('Independent Manager') are provided a copy of Matson Money's (a) their most recent ADV Part 2; (b) Disclosure Statement/Co-Adviser's Disclosure Statement and (c) the Mullennium Finance ADV Part 2;

The Advisor will determine which of the Independent Managers' portfolio programs may be appropriate, depending upon the client's circumstances, stated goals and objectives, strategy desired, account size, risk tolerance, or other factors. Clients are matched to one of seven Matson Money portfolios based on a) their investment time horizon b) the risk tolerance and c) their past investment experience.

If the Client and Advisor agree in writing, the Advisor shall continue to render advisory services to the client relative to the ongoing monitoring and review of account performance, for which the Advisor shall receive an annual advisory fee which is based upon a percentage of the market value of the assets being managed by the designated Independent Manager(s). The Advisor's fee shall be invoiced quarterly in advance or arrears as coordinated through the Client's selected Independent Manager. The Advisor's fee for its services may therefore be: a) deducted via the qualified custodian and paid directly to the Advisor; or b) shall be paid to the Advisor by the Independent Manager and represents a portion of the Independent Manager's advisory fees.

SEMINARS

Mullennium Finance holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminar is 1 hour and is educational in nature. No specific investment or tax advice is given. The seminars focus on retirement issues such as health care, estate planning, life insurance, and investments. Mullennium Finance does not charge a fee for attendance to these seminars

Client Tailored Services and Client Imposed Restrictions

Mullennium Finance focuses on providing individualized services. The Advisor can tailor services to focus only on certain portfolio components, depending upon the client's wishes and/or the nature of the engagement. However, where client services or information are limited, clients must understand that comprehensive financial and/or investment needs and objectives may not be fully considered due to the client's option to receive limited services, the lack of information received, and/or client disclosure.

The client and Advisor may complete a risk assessment or similar process, depending upon the nature of services to be provided. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or

beliefs unless otherwise agreed by the Advisor in writing. Clients are welcome to set parameters on the Advisor's limited discretionary authority in writing as to types of investments and amounts purchased or sold.

Agreements may not be assigned without written client consent.

Wrap Fee Programs

Advisor does not participate in wrap fee programs, but third party advisors may.

Client Assets under Management

Advisor does not manage client assets.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

Advisor bases its fees on hourly charges, fixed fees and solicitor fees from third party money managers. With respect to insurance products, commissions may be involved.

PENSION CONSULTING SERVICES

Advisor may charge both hourly and/or ongoing management fees depending on the plan and the services requested by the client. The Services to be provided and the advisory fees are determined at engagement.

CONSULTATION AND FINANCIAL PLANNING SERVICES

Advisor fees are determined at the time of engagement based upon the time and effort required and/or the nature and complexity of services. The Advisor's hourly fee is \$150. The Advisor requires a two-hour minimum engagement. In lieu of an hourly engagement, the Advisor may propose a project fee which will be based on time and effort. The project fee is calculated by using the Advisor's hourly rate and provides the client with a set fee the client can expect to pay. The minimum fee for Financial Planning or Consultation Services is \$500 (3.33 hours of services); the maximum fee is \$3,000. Lower fees for comparable services may be available from other sources.

If the time spent on a project turns out to take fewer hours than originally projected, the client will receive a refund based on prorating the actual time spent.

The Advisor may require a fixed fee equal to ½ the proposed project fee in order to schedule services. In these cases, the project balance is due upon the delivery of services. Should the client's condition change during the course of services such that new advice, recommendations or research are required, additional

fees may apply. The Advisor will not engage in additional services that result in fees without the client's approval.

Fees for the Advisor's annual review of a financial plan will be agreed upon at the time of engagement and are dependent upon the complexity of the financial situation and the estimated number of hours involved, including preparation and research. There is no charge of annual reviews for the first 3 years.

Fees for money under management with Matson Money, 5955 Deerfield Blvd, Mason Ohio 45040 are quoted at the time of engagement. They range from .50 % to 1.00% annually and are charged quarterly in advance. Client fees and fees charged are shown on the quarterly statements as provided by Matson Money. Clients can calculate their charged fee by taking the value of their account at the end of a quarter and multiply it by their annual fee divided by four. For example, if an account was valued a \$400,000 at the end of a quarter and the annual fee was 1%, their fee for the upcoming quarter would be \$1,000; ($1\%/4=.25\% \times \$400,000=\$1,000$). If a client were to withdraw funds from their account during a quarter, they would be credited for the days that the withdrawal amount was not in the account during the quarter. For example, taking the example from above, if a client withdrew \$50,000 from their account after 30 days in the previous quarter and there were 89 days in the previous quarter they would receive credit for 59 days (89 days in the quarter minus 30 days). If at the end of the new quarter the account was valued at \$360,000, the fee for the upcoming quarter would be \$817.13;

$(1\%/4 = .25\% \times \$360,000 = \900 . Fee for upcoming quarter

Credit for 59 days in the previous quarter: $\$1000/89=\$11.2360/\text{day}$

$\$50,000/\$400,000 = .125\% \times \$11.2360 = \$1.4045$ credit per day for \$50,000

59 days of credit x \$1.4045 per day = \$89.87

$\$900$ fee for upcoming quarter minus $\$89.87$ credit from previous quarter= $\$817.13$

There is no fee for periodic reviews of funds invested with Matson Money.

Clients will see both their annual fee schedule and the fees charged for the upcoming quarter, including any credits if applicable, on a separate page on their quarterly statements. Separate invoices are not sent.

Matson Money does not charge a separate fee.

SOLICITOR FEES FOR RECOMMEND OTHER INVESTMENT ADVISORS

Advisory fees are based upon a percentage of the market value of the assets being managed by the designated Independent Manager(s). The investment management

fees charged by the designated Independent Manager(s) are exclusive of and in addition to, Mullennium Finance's investment management fee as set forth in this ADV Part 2A.

Mullennium Finance's compensation is based on a portion of the total annual advisory fee charged to client. Mullennium's fee is between .50% and 1%. Lower fees for comparable services may be available from other sources. The Advisor's normal investment management fee is reduced and based upon the nature and complexity of services to be provided by the Advisor; the portfolio size; and special considerations if applicable.

In conjunction with these services, Mullennium Finance does not initiate/coordinate the deduction of fees via clients' custodial accounts. However, clients utilizing Matson Money can elect by written agreement to have the total investment management fees debited directly from their account by the qualified custodian holding the client's funds and securities as a convenience. In such cases, Matson Money forwards Mullennium Finance' advisory fees directly to the Advisor's account. If at any time questions pertaining to fees arise, clients should promptly contact the Advisor directly with any questions or concerns.

Clients may incur additional fees charged by third-party service providers, such as those described herein (commissions; custodial fees; etc.), and as described in the selected Independent Manager's disclosure documents

SEMINARS

Mullennium Finance does not charge fees for seminars.

Client Payment of Fees

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Advisor, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Prepayment of Client Fees

Financial planning fees will be billed half of the estimated fee at the signing of the agreement with the balance due upon delivery of the completed plan.

If the client cancels after five (5) days, any unearned fees will be refunded to the client, or any unpaid earned fees will be due to Advisor.

External Compensation for the Sale of Securities to Clients

Advisor does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of Advisor.

Managing Member William T Mullen is also a licensed insurance agent in Utah with Columbus Life and Stone Hill National Insurance Agency. From time to time he will offer clients products and/or clients services from this activity. 20% of Mr. Mullen's time may be spent on offering annuity and insurance products when it fits the overall financial plan of a client.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by the fact that Mr. Mullen has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any products or services. When fees and/or commissions are involved, Mr. Mullen will provide in writing, the amount of those fees and/or commissions. Clients have the option to purchase these products or services through another insurance agent.

Item 6: Performance-Based Fees

Sharing of Capital Gains

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

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

Item 7: Types of Clients

Description

Advisor generally provides investment advice to individuals, high net worth individuals, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

Advisor does not require a minimum to open an account.

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

Methods of Analysis and Investment Strategies

Advisor utilized the Matson Money for asset management services. Matson Money

uses structured portfolios based on Dimensional Fund Advisors of Austin Texas and the Center for Research in Security Prices at the University of Chicago. Matson Money has three basic tenets. First, Markets are Efficient. Second, Modern Portfolio Theory (MPT) and use of the efficient frontier. Third, the Three Factor Model as developed by Eugene Fama of the University of Chicago and Kenneth French of Dartmouth College. Potential clients are educated in all aspects of these three tenets. Even with this academic approach to investing it is made clear that clients can lose money using this approach to investing.

The Advisor takes the position that investors cannot beat the market over the long-term but investors can perhaps achieve market returns provided they are well diversified, remain invested and do not try to time the market. The Advisor also recommends refraining from stock picking and track record investing. Investing in securities involves risk of loss that clients should be prepared to bear.

The main sources of information include academic white papers and studies, financial newspapers and magazines, research material prepared by others, corporate rating services, annual reports, prospectuses and filings with the Securities and Exchange Commission.

Investment Strategy and Method of Analysis Material Risks

Mullennium Finance takes the general position that investors with diverse portfolios have a better chance of making a profit because it is difficult to accurately predict the movement of the economy.

Obviously, no single strategy can be relied upon to outperform the market. As outlined below, the Advisor's goal in its analysis is not to time the market.

Mullennium Finance primarily utilizes long-term investing and rarely uses short-term trading. Even less frequently, margin and option transactions may be utilized.

Mullennium Finance seeks to utilize investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Short sales, margin transactions and options writing

generally hold greater risk and clients should be aware that there is a chance of material risk of loss using any of those strategies.

Investments in individual stocks can be risky. Some risks can be controlled and some risks can be guarded against but no investment strategy can carry guarantees from loss. Certain market risks cannot be controlled, such as market or economic conditions. Certain strategies may be employed to adjust portfolios or the Advisor and client may agree to hold the portfolio's course. The Advisor generally designs portfolio strategies for the long-term, unless otherwise specifically requested in writing. Therefore, the Advisor does not attempt to time the market.

Investments in mutual funds may bear a risk of investment loss. Clients who invest should also be prepared to bear a loss of investment proceeds.

Thoughtful investment selections that meet a client's stated goals and risk profile may help keep individual stock and bond risks at an acceptable level.

Fixed income investments generally are utilized as a portfolio diversification element as well as for income deriving investments outside of equity exposure.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- *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 today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from

investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- *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.

Item 9: Disciplinary Information

Criminal or Civil Actions

The firm and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

The firm and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

No affiliated representatives of Advisor are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Advisor nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Member William T. Mullen is also a licensed insurance agent in Utah with Columbus Life Insurance and Stone Hill National Insurance Agency. In addition, he prepares tax returns for approximately 8 individuals. Less than 1% of Mr. Mullen's time is spent on such tax preparation. From time to time he will offer clients products and/or clients services from this activity. Another 20% of Mr. Mullen's time may be spent on offering annuity and insurance products when it fits the overall financial plan of a client.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by the fact that Mr. Mullen has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or tax preparer of their choosing.

If other investment advisors are recommended the advisory does not receive any compensation.

Recommendations or Selections of Other Investment Advisers and Conflicts of Interest

Advisor may select other advisors. This situation creates a conflict of interest. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of Advisor. The process of selection is detailed in Item 4 of this brochure; the fees are detailed in Item 5 of this brochure. Prior to introducing any clients to third party advisors, Mullennium Finance will make sure they are properly licensed or notice filed in the state in which the client resides.

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

Code of Ethics Description

Mullennium Finance takes the issue of regulatory compliance seriously and is committed to maintain compliance with state and applicable federal securities laws. Additionally, the Advisor has a position of public trust and it is our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable. Mullennium Finance places great value on ethical conduct. Therefore, the ultimate goal of our internal policies is to challenge our staff to live up not only to the letter of the law, but also to the ideals set forth by the Advisor.

Clients may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered Investment Advisor, Mullennium Finance is a fiduciary to each and every client. As fiduciaries, Investment Advisors owe their clients several specific duties. According to the United States Securities Commission (“SEC”), to which most state regulators defer in this instance, an Investment Advisor’s fiduciary duties include:

- Providing advice that is suitable;
- Providing full disclosure of material facts and potential conflicts of interest (such that the client has complete and honest disclosure in order to make an informed decision about services of the Advisor and about investment recommendations);
- The utmost and exclusive loyalty and good faith;
- Best execution of transactions under the available circumstances;
- The Advisor’s reasonable care to avoid ever misleading clients;
- Only acting in the best interests of clients.

It is the Advisor’s policy to protect the interests of each of the Advisor’s clients and to place the clients’ interests first and foremost in each and every situation. Mullennium Finance will abide by honest and ethical business practices to include, but is not limited to:

- The Advisor will not induce trading in a client’s account that is excessive in size or frequency in view of the financial resources and character of the account.
- The Advisor will make investment decisions with reasonable grounds to believe that the decisions are suitable for the client on the basis of information furnished by the customer and we will document suitability.
- The Advisor and Advisory Representatives will not borrow money from clients.
- The Advisor will not recommend the purchase of a security without the reasonable belief that the security is registered, or the security or transaction is exempt from registration in states where we provide investment advice and based upon information the Advisor receives.

- The Advisor will not recommend that the client place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of a broker/dealer that is not licensed, based upon information available to the Advisor.
- The staff of the Advisor will report all required personal securities transactions as set forth in the Advisor's policies and procedures manual (non-reportable securities holdings include mutual funds and government securities, for example. List available upon request).

In addition to the above, the Advisor emphasizes the unrestricted right of clients to decline to implement any advice rendered, in whole or part.

All applicable securities rules and regulations will be strictly enforced. The Investment Advisor will not permit and has instituted controls against insider trading. Advisory Representatives and administrative personnel who do not follow the Advisor's Code of Ethics or who in any way violate securities rules and regulations, or who fail to report known or suspected violations will be disciplined or terminated, depending upon severity. Such persons could also face action by the state and/or SEC regulators. Clients are welcome to request a copy of the Advisor's Code of Ethics by contacting the Advisor's office.

The firm will provide a copy of the Code of Ethics to any client or prospective client

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Advisor and its employees do not recommend to clients securities in which we have a material financial interest.

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

Advisor acknowledges the Advisor's fiduciary responsibility to place the investment needs of clients ahead of the Advisor and its staff. The interests of clients are held in

the highest regard. The Advisor or individuals associated with the Advisor may have similar investment goals and objectives and as a result may buy or sell securities for their personal accounts that may be identical to or different from those recommended to clients.

Thus, at times the interests of the Advisor's or staff members' accounts may coincide with the interests of clients' accounts. However, at no time will the Advisor or any related person receive an added benefit or advantage over clients with respect to these transactions. The Advisor and its associated persons will not place itself in a position to have added benefit as a result of advice given to

clients. The staff of Mullennium Finance shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. William Mullen, the Managing Member and Chief Compliance Officer of the Advisor is responsible for the monitoring of personal trading conducted by staff.

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

Advisor does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Advisor does not have any affiliation with product sales firms and does not recommend brokers. Brokers will be recommended by the third party money manager being used.

- *Directed Brokerage*
Advisor utilized Third Party Money Managers and therefore it does not take direction from clients as to what broker-dealer to use.
- *Best Execution*
Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. Advisor does not have discretionary authority and therefore best execution is not applicable.
- *Soft Dollar Arrangements*
Advisor does not maintain any soft dollar arrangements.

Aggregating Securities Transactions for Client Accounts

Advisor does not trade for its or its clients' accounts and therefore aggregation of securities transactions is not applicable.

Item 13: Review of Accounts

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

Client Accounts involve ongoing monitoring of clients' managed portfolios. Internal reviews are conducted no less than quarterly but may occur more frequently based upon individual circumstances and the nature and/or complexity of the

portfolio. Internal reviews may also occur as a result of market conditions; reported changes in the client's financial situation, at the time of significant deposits or withdrawals; or at the Advisor's discretion. Reviews are conducted by William Mullen, CFP® the Managing Member and Chief Compliance Officer. The Advisor requests that clients keep in regular contact with the Advisor. Clients should meet with the Advisor at least annually to ensure the investment plan/strategies continue to be aligned with the clients' stated individual needs, goals, objectives, time horizon and risk tolerance. However, clients are obligated to promptly inform the Advisor of any change in the client's financial condition or circumstances in order to provide the Advisor with an opportunity to consider the current information and if any changes in the investment strategy/plan are appropriate.

The Advisor is also available to provide Consultation Services or Financial Planning Services, however these services are not ongoing and therefore do not provide for reviews or follow-up services unless otherwise agreed in the Client Agreement. Therefore, Consultation Services and Financial Planning Services terminate upon the delivery of services. The advice or recommendations provided may include recommendations for reviews or follow-up services. In such cases, it is the client's obligation to secure additional or follow-up services with the Advisor at the client's discretion.

Review of Client Accounts on Non-Periodic Basis

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

Content of Client Provided Reports and Frequency

Clients receive account statements either monthly or quarterly for managed accounts. Account reports are issued by the Third Party Money Manager's Custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

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

There are times when an external source, such as an insurance company, might offer an economic benefit as an incentive to sell their product(s).

This represents a conflict of interest because it gives an incentive to recommend products and services based on the incentive. This

conflict is mitigated by the fact that Mr. Mullen has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any products or services. When an incentive is involved, Mr. Mullen will provide in writing the description of the incentive and an estimate of the monitorial value of the incentive.

Advisory Firm Payments for Client Referrals

Advisor does not compensate for client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by Third Party Money Manager.

Item 16: Investment Discretion

Discretionary Authority for Trading

Advisor does not accepts discretionary authority to manage securities accounts on behalf of clients.

Item 17: Voting Client Securities

Proxy Votes

Advisor does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because Advisor does not serve as a custodian for client funds or securities and Advisor does not require prepayment of fees of more than \$500 per client and six months or more in advance.

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

Advisor has no condition that is reasonably likely to impair our ability to meet

contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

Neither Advisor nor its management has had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Mr. Mullen does not receive any performance based fees.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

A customer filed a written complaint against Mr. Mullen in November 2008 alleging misrepresentation of the variable annuity they purchased in February 2005. The case was settled in August 2009 and Mr. Mullen did not contribute to the settlement. Mr. Mullen presented the product to the clients exactly as it was explained to him by Ohio National Life Insurance Co. Neither the State of Utah Insurance Department nor the Board of Certified Financial Planners took any disciplinary action against Mr. Mullen.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Supervised Person Brochure

Part 2B of Form ADV

William T. Mullen

Mullennium Finance, LLC
4315 Hidden Cove Road
Park City, UT 84098
PHONE: 435-655-0508
FAX: 435-655-0759
EMAIL: Bill@BillMullen.org
WEBSITE: www.BillMullen.org

This brochure supplement provides information about William T. Mullen that supplements the Mullennium Finance, LLC's brochure. You should have received a copy of that brochure. Please contact William T. Mullen if you did not receive Mullennium Finance, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about William T. Mullen is available on the SEC's website at www.adviserinfo.sec.gov.

February 1, 2018

Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure

Principal Executive Officer

William T. Mullen CFP®

Professional

Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- When you achieve your CFP designation, you must renew your certification every year, pay \$360 certification fee and complete 30 hours of continuing education of every 2 years.

Education and Business Standards

Educational Background:

- Year of birth: 1937
- Manhattan College; B.S., Mathematics; 1961
- Virginia Tech; M.B.A., Finance; 1982

Business Experience:

- Mullennium Finance, LLC; Managing Member/Investment Adviser Representative; 1995 – Present
- Stone Hill National Insurance Agency; Licensed Insurance Agent; 1994 - Present
- Tricor Financial, LLC; Registered Representative; 2009 – 2010

- Royal Alliance Associates, Inc.; Registered Representative; 2006
–
2009
- Walnut Street Securities, Inc.; Registered Representative; 1996
–
2006

Disciplinary Information

None to report

Other Business Activities

Managing Member William T. Mullen is also a licensed insurance agent in Utah with Columbus Life Insurance and Stone Hill National Insurance Agency. In addition, he prepares tax returns for approximately 8 individuals. Less than 1% of Mr. Mullen's time is spent on such tax preparation. From time to time he will offer clients products and/or clients services from this activity. Another 20% of Mr. Mullen's time may be spent on offering annuity and insurance products when it fits the overall financial plan of a client.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by the fact that Mr. Mullen has a fiduciary responsibility to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or tax preparer of their choosing.

Additional Compensation

Mr. Mullen receives additional compensation in his capacity as an insurance agent and tax preparer, but he does not receive any performance based fees.

Supervision

Since Mr. Mullen is the sole owner and Investment Adviser Representative of Mullennium Finance, LLC he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Requirements for State-Registered Advisers

Arbitration Claims: A customer filed a written complaint against Mr. Mullen in November 2008 alleging misrepresentation of the variable annuity they purchased in February 2005. The case was settled in August 2009 and Mr. Mullen did not contribute to the settlement.

The State of Utah does not require a client to mediate any dispute nor does it require that a client submit a matter to an arbitrator. Nothing in this brochure or any other agreement that the clients signs limits the clients' rights under Utah law.

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None