Part 2A of Form ADV: Firm Brochure

Form ADV, Part 2A, Item 1

Cover Page

Blue Monarch Financial Inc.

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Reviewed and Revised 2.18.2026

FORM ADV PART 2
FIRM BROCHURE

This brochure provides information about the qualifications and business practices of Blue Monarch Financial Inc. If you have any questions about the contents of this brochure, please contact us at (469) 933-1125. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Blue Monarch Financial Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Blue Monarch Financial, Inc. is 330561.

Blue Monarch Financial Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Form ADV, Part 2A, Item 2

Material Changes

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. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (469) 933-1125.

Material Changes since the Last Update

Blue Monarch Financial, Inc. was established as a new Registered Investment Adviser firm in 2024 under the State of Texas rules. The following material changes have been made since the last update on October 31, 2025:

- Adding Jonathan D. Fraizer, CRD # 4364934, as an Investment Adviser Representative on January 28, 2026

- Removed Ashely Phelan, Non-Registered, as Vice President of BMF on February 11, 2026.

- Removed Thomas Phelan, CRD # 7884042, as an Investment Adviser Representative on January 26, 2026.

Form ADV, Part 2A, Item 3

Table of Contents

Item 1 - Cover Page 1

Item 2 - Material Changes 2

Item 3 - Table of Contents 3

Item 4 - Advisory Business 4

Item 5 - Fees and Compensation 6

Item 6 - Performance-Based Fees and Side-By-Side Management 8

Item 7 - Types of Clients 8

Item 8 - Methods of Analysis, Investment Strategies, and Risk of Loss 9

Item 9 - Disciplinary Information 11

Item 10 - Other Financial Industry Activities and Affiliations 11

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading 12

Item 12 - Brokerage Practices 13

Item 13 - Review of Accounts 14

Item 14 - Client Referrals and Other Compensation 14

Item 15 - Custody 14

Item 16 - Investment Discretion 15

Item 17 - Voting Client Securities 15

Item 18 - Financial Information 16

Item 19 - Requirements for State-Registered Advisers 16

Form ADV Part 2A, Item 4

Advisory Business

Blue Monarch Financial, Inc. (hereinafter called "BMF") is a Registered Investment Adviser firm based in Greenville, Texas, and incorporated under the laws of the State of Texas. BMF is owned by Brigette Engstrom. BMF is registered with the State of Texas and is subject to its rules and regulations.

Founded in May 2024, BMF provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, preparing written investment strategies, retirement income planning, long term care planning, tax planning, estate planning, wealth management, 401(k) rollover, and/or insurance planning. Our process in providing these services is to offer a simple but effective guideline to follow towards retirement that includes: 1. Sustainable Spending Plan 2. Retirement Income Plan 3. Plan for Living with Health Issues 4. Understand Your Relationship with the IRS 5. Estate Planning. Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification.

BMF provides investment advisory and other financial services through its registered Investment Advisory Representative(s) ("IAR") to accounts opened with BMF. The IARs of the firm are supervised by the CCO. Managed Accounts are available to individuals and high net worth individuals.

BMF provides discretionary and non-discretionary investment advisory services to some of its clients through various managed account programs. BMF will assist clients in determining the suitability of the Managed Account Programs for the client. The IAR is compensated through a comprehensive single-fee and the account may be assessed other charges associated with conducting a brokerage business. BMF and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, review the investment objectives and evaluate the investment vehicle selections
- Providing Firm Brochure (this document)

Third-Party Money Managers

BMF, in providing the services agreed upon with the client, may recommend a third-party money manager (the "Sub-Advisor"), an unaffiliated investment adviser registered under applicable securities laws, as a Sub-Advisor to manage all or a portion of the managed assets in the Client's account. BMF offers these services based on the individual goals, objectives, time horizon, and risk tolerance of each client. If it is determined that the portfolio management services offered by a Sub-Advisor are in the best interest of the client, BMF will utilize the Sub-Advisor to manage the client assets. If this occurs, BMF will be responsible for the continuing supervision of the Client's account, and the actions of the Sub-Advisor in connection with the Client's account and the managed assets. Use of unaffiliated investment advisory firms as Sub-Advisor are recommended to assist us with the development and recommendation of appropriate investment options for your account(s). The Agreement with the Sub-Advisor will grant the Sub-Advisor discretionary authority to manage the assets. The Sub-Advisor recommended by BMF is a Registered Investment Adviser firm under applicable securities laws, and they may manage all or a portion of the managed assets in the client's account. BMF also will be responsible for the payment of any advisory fee or other charges of the Sub-Advisor with respect to the managed assets unless or except as specifically authorized in advance by the Client.

The Sub-Advisor provides to the client investment management solutions, direct asset management, a web-based client portal as well as business process support for BMF.

The Sub-Advisor recommends a Wrap Fee Program for the client's account(s). A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Clients with Wrap Fee Program accounts will be provided with the Sub-Advisor's Wrap Fee Brochure - Appendix 1 of Part 2A of Form ADV: Wrap Fee Brochure

BMF does have an affiliation with a Sub-Advisor / Registered Investment Adviser firm - Impact Partnership Wealth, LLC ("IPW") (CRD # 313928/ SEC#: 801-121239). More information about Impact Partnership Wealth, LLC can be found here:
https://adviserinfo.sec.gov/firm/summary/313928

By way of BMF's affiliation with a Sub-Advisor / Registered Investment Adviser firm - Impact Partnership Wealth, LLC ("IPW") (CRD # 313928/ SEC#: 801-121239) and its corresponding affiliation with a Sub-Advisor / Registered Investment Adviser firm - AE Wealth Management, LLC ("AEWM") also has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee.

More information about AE Wealth Management, LLC can be found here:
https://adviserinfo.sec.gov/firm/summary/282580

IPW/AEWM shall, on a monthly basis in arrears:

a. Deduct an amount equal to the gross investment advisory fee payable in relation to each Client Account, based upon the average daily balance of such account during the applicable billing period;

b. Deduct any fees payable to IPW in relation to the services provided hereunder;

c. Deduct and pay fees to all other service providers whose fees IPW has been directed to pay on Adviser's behalf;

d. Deduct any other amounts IPW is required or permitted to deduct, including deductions for fee adjustments and client refunds paid by IPW; and

e. Pay the remaining fees to Adviser within thirty (30) days of the end of the month for which payment is being made, unless such date falls on a non-banking day (i.e. holidays, weekends), in which case Adviser's payout will be made the last banking day prior to such date.

BMF currently has approximately eight (**8**) million dollars in assets under management.

Client also acknowledges that BMF does have a relationship with an independent qualified custodian(s).

Form ADV, Part 2A, Item 5

Fees and Compensation

The following types of fees will be assessed:

Asset Management – Fees are charged monthly in arrears and are based primarily on asset size and the level of complexity of the services provided. BMF and its supervised persons accepts compensation for the sale of securities or other investment products. In individual cases, BMF has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. Comparable services for lower fees may be available from other sources. Fees for the initial month will be prorated based upon the number of calendar days in the calendar month that the advisory agreement is in effect. Fees are based on the average daily balance of the assets for the month. Annual fees are a maximum of 1.65%. Consulting services are included in these fees for asset management services and include evaluation of the client financial circumstances, financial needs and goals, and review of options that are in the best interest of each client.

Fee Schedule for Asset Management:

Total Account Value	Maximum Annual Advisory Fee
All Account Values	1.65%

For clients utilizing a Sub-Advisor for asset management services, the fee stated above will include the Sub-Advisor's fee. Clients will receive the Sub-Advisors' Form ADV Part 2A or Wrap Fee Program Brochure reflecting such fees. Total fees charged by both parties will not exceed one point six-five (**1.65%**) percent of assets under management per year. As authorized

in the client agreement, the account custodian withdraws BMF's advisory fees directly from the clients' accounts according to the custodian's policies, practices, and procedures. The custodian will send the client a statement monthly which includes the amount of any fees paid to BMF for advisory services.

BMF uses a flat fee payment structure for calculations. For example, if a client invests a lump sum of $1.5 million in total Assets Under Management ("AUM"), then the below calculation applies:

Calculation Example:

Total Amount = $1.5 million x 1.65% = $24,750

All BMF client accounts will be in WRAP accounts. This means that the Client will NOT be charged for transaction and brokerage costs. These costs will be covered by BMF and/or the Sub-Advisor.

You should carefully review the statement from your custodian/broker-dealer's statement and verify the calculation of fees. Your custodian/broker-dealer does not verify the accuracy of fee calculations. Clients are urged to compare the account statements received from the custodian with any reports received from BMF and notify the firm promptly of any discrepancies.

Fees are charged in arrears on a monthly basis, meaning that advisory fees for a month are charged on the last day of the month. Clients may terminate investment advisory services obtained from BMF, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with BMF. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon written notice delivered to and received by BMF. Clients who terminate investment advisory services during a month are charged a prorated advisory fee based on the date of BMF's receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable, and any prepaid and unearned fees will be immediately refunded.

Additional Fees and Expenses

In addition to advisory fees paid to BMF as explained above, clients may pay custodial service, account maintenance, transaction, and other fees associated with maintaining the account. These fees vary by broker and/or custodian. Clients should ask BMF for details on transaction fees or other custodial fees specific to their account, as these fees are not included in the annual advisory fee. BMF does not share any portion of such fees. Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with BMF and are compensation to the fund manager. Clients are urged to read the mutual fund prospectus prior to investing.

Neither BMF nor any of the firm's supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Mutual fund companies impose internal fees and expenses on clients. These fees are in addition to the costs associated with the investment advisory services as described above. Complete details of such internal expenses are specified and disclosed in each mutual fund company's prospectus. Clients are strongly advised to review the prospectus(es) prior to investing in such securities.

Mutual funds purchased or sold in broker-dealer accounts may generate transaction fees that would not exist if the purchase or sale were made directly with the mutual fund company. Mutual funds held in broker-dealer accounts also charge management fees. These mutual fund management fees may be more or less than the mutual fund management fees charged if the client held the mutual fund directly with the mutual fund company.

Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of BMF or paying the advisory fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive BMF's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary.

Please refer to **Item 12** "**Brokerage Practices**" of this brochure for additional information.

Form ADV, Part 2A, Item 6

Performance-Based Fees and Side-By-Side Management

Blue Monarch Financial Inc. does not charge performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or appreciation of the assets of a client. Our fees are calculated as described in Fees and Compensation section above, and are not charged on the basis of performance of your advisory account.

Form ADV, Part 2A, Item 7

Types of Clients

BMF offers investment advisory services to individuals and high net worth individuals. There is no minimum account size to open and maintain an advisory account.

Form ADV, Part 2A, Item 8

Methods of Analysis, Investment Strategies, and Risk of Loss

BMF's methods of analysis and investment strategies incorporate the client's needs and investment objectives, time horizon, and risk tolerance. BMF is not bound to a specific investment strategy for the management of investment portfolios, but rather consider the risk tolerance levels pre-determined gathered at the account opening, as well as on an on-going basis. Examples of methodologies that our investment strategies may incorporate include:

Asset Allocation – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk.

Dollar-Cost Averaging – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging lessens the risk of investing a large amount in a single investment at the wrong time.

Technical Analysis – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

Long-Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short-Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. These risks include market risk, interest rate risk, issuer risk, and general economic risk. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

BMF's primary goal for investing is to help the client maintain purchasing power over the long term. This may result in short term variability and loss of principal. Time horizon and risk tolerance are key determinates of the proper asset allocation. BMF's approach focuses on taking

appropriate risks for which clients are compensated (i.e. market risk) and seeking to limit or eliminate risks that do not provide compensation over the long term (i.e. individual stock risk or lack of portfolio risk).

Below are some more specific risks of investing:

Market Risk. The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by the client or an underlying fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

Management Risk. BMF's investment approach may fail to produce the intended results. If our perception of the performance of a specific asset class or underlying fund is not realized in the expected time frame, the overall performance of client's portfolio may suffer.

Equity Risk. Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

Fixed Income Risk. The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

Municipal Securities Risk. The value of municipal obligations can fluctuate over time, and may be affected by adverse political, legislative and tax changes, as well as by financial developments that affect the municipal issuers. Because many municipal obligations are issued to finance similar projects by municipalities (e.g., housing, healthcare, water and sewer projects, etc.), conditions in the sector related to the project can affect the overall municipal market. Payment of municipal obligations may depend on an issuer's general unrestricted revenues, revenue generated by a specific project, the operator of the project, or government appropriation or aid. There is a greater risk if investors can look only to the revenue generated by the project. In addition, municipal bonds generally are traded in the "over-the-counter" market among dealers and other large institutional investors. From time to time, liquidity in the municipal bond market (the ability to buy and sell bonds readily) may be reduced in response to overall economic conditions and credit tightening.

Investment Companies Risk. 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). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. BMF has no control over the risks taken by the underlying funds.

Form ADV, Part 2A, Item 9

Disciplinary Information

Blue Monarch Financial Inc. or its Principal Executive Officers have not had any reportable disclosable events in the past ten (**10**) years.

Form ADV, Part 2A, Item 10

Other Financial Industry Activities and Affiliations

Only BMF's Chief Compliance Officer, Brian Megenity, is currently affiliated / registered with other Broker-dealer firms and other Registered Investment Adviser firms.

All other Investment Adviser Representative(s) of BMF are not affiliated / registered with other Broker-dealer firms and other Registered Investment Adviser firms.

Neither BMF nor its Investment Adviser Representative(s) are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

BMF operates as two (2) distinct business entities. One business entity is a Registered Investment Adviser firm. The other business entity that BMF operates is an insurance agency. The insurance agency and their agents provide various insurance products. Due to this, insurance agents may refer insurance clients to BMF, the Registered Investment Adviser firm. At the same time, Investment Adviser Representative(s) may refer advisory clients to the insurance agency. Clients should be aware that these recommendations for service involve a conflict of interest. To mitigate this, BMF always acts in the best interest of the client and maintains a fiduciary responsibility, including referrals for advisory clients. Clients are in no way required to utilize the insurance agency and may always select an insurance agent of their choosing.

Investment Adviser Representative(s) of BMF are not licensed insurance agents of BMF. Therefore, the Investment Adviser Representative(s) of BMF do not offer BMF Clients advice or products from those insurance activities. Thus, BMF Clients should be aware there are never recommendations for insurance-related services being made by Investment Adviser

Representative(s) of BMF.

Prior to selecting other third-party investment advisors (sub-advisors), BMF will ensure they are properly licensed or reported.

Form ADV, Part 2A, Item 11

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

BMF's Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of BMF's Associated Persons are expected to strictly adhere to these guidelines. Persons associated with Blue Monarch Financial Inc. are also required to report any violations to the Code of Ethics. Additionally, the firm maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

BMF and its employees may buy or sell securities that are also held by clients. It is the expressed policy of the advisor that no person employed by our firm purchase or sell any security prior to the transaction being implemented for an advisory account; therefore, preventing such employees from benefiting from transactions placed on behalf of the advisory clients.

BMF or its Investment Adviser Representative may have an interest or position in a certain security, which may also be recommended to the client. As these situations may present a conflict of interest, BMF has established the following restrictions in order to ensure its fiduciary responsibilities should this issue ever arise:

1. A director, officer or employee of BMF shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing public. No owner/employee of BMF shall prefer their own interest to that of the client.
2. BMF maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.
3. BMF requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.
4. BMF may block personal trades with those of clients but will ensure that clients are not at a disadvantage.

BMF has reasonably disclosed all conflicts of interest related to it or its supervised persons.

BMF's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting the Chief Compliance Officer, Brian Megenity, at (469) 933-1125.

Form ADV, Part 2A, Item 12

Brokerage Practices

In order for BMF to provide asset management services, we request you utilize the brokerage and custodial services of Charles Schwab & Co., Inc. ("Schwab") or Fidelity Investments ("Fidelity"), for which we have existing relationships. BMF and Schwab or Fidelity are not affiliated companies. In considering which independent qualified custodian will be the best fit for BMF's business model, we are evaluating the following factors, which is not an all-inclusive list:

- Financial strength
- Reputation
- Reporting capabilities
- Execution capabilities
- Pricing, and
- Types and quality of research

While you are free to choose any broker-dealer or other service provider, we recommend that you establish an account with a brokerage firm with which we have an existing relationship. Such relationships may include benefits provided to our firm, including, but not limited to research, market information, and administrative services that help our firm manage your account(s). We believe that recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by the recommended broker-dealers, including the value of research provided, the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

BMF does not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

BMF does not have any formal soft dollar arrangements.

When BMF buys or sells the same security for two or more clients (including our personal accounts), we may place concurrent orders to be executed together as a single "block" in order to facilitate orderly and efficient execution. Each client account will be charged or credited with the average price per unit. We receive no additional compensation or remuneration of any kind because we aggregate client transactions. No client is favored over any other client. If an order

is not completely filled, it is allocated pro-rata based on an allocation statement prepared by BMF prior to placing the order. Because of an order's aggregation, some clients may pay higher transaction costs, or greater spreads, or receive less favorable net prices on transactions than would otherwise be the case if the order had not been aggregated.

Form ADV, Part 2A, Item 13

Review of Accounts

Client accounts are reviewed at least quarterly by BMF's Chief Compliance Officer, Brian Megenity. Brian Megenity reviews clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at BMF are assigned to this reviewer.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Each client will receive at least quarterly a written report that details the clients' account which may come from the custodian.

Clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports.

Form ADV, Part 2A, Item 14

Client Referrals and Other Compensation

BMF does not compensate any individual or firm for client referrals. In addition, BMF does not receive compensation for referring clients to other professional service providers.

Form ADV, Part 2A, Item 15

Custody

BMF has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian. BMF has written authorization from the client to deduct advisory fees from the account held with the qualified custodian. By way of BMF's affiliation with a Sub-Advisor / Registered Investment Adviser firm - Impact Partnership Wealth, LLC ("IPW") (CRD # 313928/ SEC#: 801-121239) and its corresponding affiliation with a Sub-Advisor / Registered Investment Adviser firm - AE Wealth Management, LLC ("AEWM") also has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee.

More information about AE Wealth Management, LLC can be found here: https://adviserinfo.sec.gov/firm/summary/282580

Each time a fee is directly deducted from a client account, the affiliated Sub-Advisor / Registered Investment Adviser firms of IPW and AEWM concurrently:

- Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
- The affiliated Sub-Advisor / Registered Investment Adviser firms of IPW and AEWM sends the client an invoice or statement of the fee. The invoice or statement identifies the value of the assets under management on which the fee is based, and the time period covered by the fee.

Therefore, as a BMF client, you will receive account statements generated with the assistance from BMF's affiliated Sub-Advisor/Registered Investment firms of IPW/AEWM indicating the independent, qualified custodian holding your funds at least on a quarterly basis. The account statement from your qualified custodian will indicate the amount of advisory fees deducted from your account(s) each billing cycle. Please note that due to technical relationship reasons, your account statements will not have BMF listed as your Registered Investment Adviser firm, but rather that of IPW/AEWM. For now, this is a normal occurrence that has been identified and solutions are being worked on towards rectifying this matter. However, you may be rest assured that your Registered Investment Adviser firm is BMF.

Clients should carefully review statements received from the custodian. BMF's affiliated Sub-Advisor/Registered Investment firms of IPW/AEWM sends quarterly invoices detailing the manner and amount of advisory fees to all clients.

BMF notifies the Commissioner in writing that the investment adviser intends to use the safeguards provided in this section.

Form ADV, Part 2A, Item 16

Investment Discretion

Before BMF can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, you may grant the firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary authority for investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to BMF in writing. Please refer to **Section 4 "Advisory Business"** of this Brochure for more information on our discretionary management services.

By providing BMF with discretionary authority over your account you are also providing IPW/AEWM the needed discretionary authority to execute transactions in your account(s).

Form ADV, Part 2A, Item 17

Voting Client Securities

We do not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

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 any electronic solicitation to vote proxies.

Form ADV, Part 2A, Item 18

Financial Information

BMF is not required to provide financial information to our clients because we do not require or solicit the prepayment of more than five hundred (**$500**) dollars (**6**) six or more months in advance. BMF has not been the subject of a bankruptcy petition at any time during the past ten (**10**) years.

Form ADV, Part 2A, Item 19

Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons Education and Business Background:

Brigette Engstrom
CEO

Business Background:

Blue Monarch Financial Inc., CEO, March 2024 – Present

Blue Monarch Financial Services, CEO, October 2023 - Present

Alliance for Federal Employees, Inc., CEO, July 2022 – Present

Educational Background:

University of Texas at Austin, Bachelor of Science in Nursing, Graduated: 2003

Brian Megenity
Chief Compliance Officer

Business Background:

Blue Monarch Financial Inc., Chief Compliance Officer, October 2025– Present

Mr. Megenity is the Chief Compliance Officer of BMF. Mr. Megenity has a B.B.A. and M.B.A. from Georgia State University. Mr. Megenity has extensive experience serving in various compliance roles in the financial services industry, including the last 20 plus years as president of B/D Consulting Associates, Inc., a boutique consulting firm providing compliance services to various financial services firms. In this role, Mr. Megenity provides outsourced services to a number of independent financial services firms, including serving as Chief Compliance Officer of BMF. The services Mr. Megenity provides on behalf of B/D Consulting Associates Inc. comprises substantially all of his professional time. In 2001, Mr. Megenity agreed to an acceptance, waiver and consent with FINRA providing that Mr. Megenity, while serving as a registered representative of a FINRA member firm, acted as a general securities principal without proper registration. As a result, Mr. Megenity paid an administrative fine of $2,500 and his association with a FINRA member firm was suspended for ten business days. Additional information regarding this event is set forth in Mr. Megenity's Form U4, which is available at https://brokercheck.finra.org/individual/summary/2889637.

Professional Designations:

- FINRA Series 7, 14, 24, 27, 62, 63, 66, 79 and 99 registrations

Educational Background:

Georgia State University, Atlanta, Georgia
Master of Business Administration, 1992

Major: Finance

Georgia State University, Atlanta, Georgia
Bachelor of Business Administration, 1990, Graduated Summa Cum Laude

Major: Finance

Jonathan Frazier
Investment Adviser Representative

Business Background:

Blue Monarch Financial Inc., Investment Adviser Representative, January 2026– Present

Mr. Frazier is an Investment Adviser Representative with BMF. Mr. Frazier has extensive experience

serving in various compliance roles in the financial services industry, leading customer complaint oversight, regulatory testing, surveillance, branch office examinations, and compliance technology. Most recently, Mr. Frazier directed these functions for an organization with more than eleven thousand (**11,000**) registered representatives and over six thousand (**6,000**) branch offices.

Professional Designations:

FINRA Series 6, 7, 24, 26, 63, 65, and SIE registrations

Educational Background:

University of North Georgia, Dahlonega, Georgia

Major: Bachelor of Business Administration ("BBA"), approximately fifty (**50**) hours of course work completed of the minimum of one hundred twenty (**120**) semester credit hours for graduation.https://brokercheck.finra.org/individual/summary/4364934

Other Disclosable Items:

- None of the Principal Executive Officers and Management persons listed have had any customer complaints and any disciplinary events required to be disclosed in this section have been disclosed.
- Neither Blue Monarch Financial Inc. nor any of its supervised persons charge performance-based fees.
- Neither Blue Monarch Financial Inc. nor any of its Management persons have any relationships or arrangements with any issuers of securities.