



MILE WEALTH
MAKING IT LOOK EASY

Form ADV Part 2A – Firm Brochure

MILE Wealth Management LLC

100 Spectrum Center Drive, Suite 900

Irvine, CA 92618

949-441-4410

www.milewealth.com

March 31, 2026

Item 1: Cover Page

This Firm Brochure provides information about the qualifications and business practices of MILE Wealth Management LLC. If you have any questions about the contents of this Brochure, please contact us at 949-441-4410. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

MILE Wealth Management LLC is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training.

Additional information about MILE Wealth Management LLC is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using the firm’s identification number 288519.

Item 2: Material Changes

From time to time, we may amend this Firm Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. This complete Brochure or a summary of material changes shall be provided to each client annually and if a material change occurs in our business practices.

Since the last annual amendment to our Brochure dated March 27, 2026, we have made the following material changes:

- We now only offer Comprehensive Financial Planning Services in conjunction with Investment Management Services. This service is provided for clients with at least \$600,000 in assets under management and for no additional fee. Please see Item 4 below for a description of our services and Item 5 for a description of the associated fees.

At any time, you may view our current Brochure on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov, by searching for our firm name or by our CRD number 288519. You may also request a copy of this Brochure at any time by contacting us at 949-441-4410 or visiting our website at www.milewealth.com.

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Item 4: Advisory Business

Description of Advisory Firm

MILE Wealth Management LLC (“MWM”) was founded in April 2017 and became registered as an investment adviser in May 2017. Mark Wilson is the principal owner of MWM. Information regarding his formal education and business background can be found on the accompanying Form ADV Part 2B (“Brochure Supplement”).

MWM currently reports \$120,121,620 in assets managed on a discretionary basis and \$0 in assets managed on a non-discretionary basis as of December 31, 2025.

Types of Advisory Services

Investment Management Services

With our Investment Management Services, we manage individually tailored investment portfolios on an ongoing basis. We provide continuous advice to clients regarding the investment of their funds based on their individual needs. Through personal discussions in which goals and objectives based on the client's particular circumstances are established, we develop their personal investment policy or investment plan with an asset allocation target. We then create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss the client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (such as maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. We typically recommend mutual funds, exchange-traded funds, stocks, and bonds for our clients' portfolios, but could also recommend other types of investments when appropriate based on the client's circumstances. We provide this service on a discretionary basis, which means we are not required to give you advance notice or seek your consent for any changes to your portfolio.

Financial Planning Services

Financial Planning Services involve an evaluation of the client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. We will guide the client through a process to establish their goals and objectives, and the client will be required to provide information as necessary to help us analyze their current financial situation and develop a financial plan specific to your needs. 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.

In general, the financial plan will address any or all of the following areas of concern. The client and MWM will work together to select the specific areas to cover, which may include, but are not limited to, the following:

- **Business Planning:** We will provide advice for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. We work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit, along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves and strategies to save desired amounts.
- **College Savings:** This analysis includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. We will provide recommendations for savings strategies and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren.

- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies, such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning, if requested. From time-to-time, we will participate in meetings or phone calls between you and your attorney upon your request.
- **Financial Goals:** We will help you identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** We will review your existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile insurance.
- **Investment Analysis:** This analysis may involve developing an asset allocation strategy to meet your financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker-dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 below.
- **Retirement Planning:** Our retirement planning analysis typically includes projections of your likelihood of achieving your financial goals, focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections, by adjusting certain variables (such as working longer, saving more, spending less, or taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.
- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (that is, "self-insuring").
- **Tax Planning Strategies:** Strategic advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of accounts or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state, or local tax laws and rates that may impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area, if requested. We will participate in meetings or phone calls between you and your tax professional upon your request.

Financial planning recommendations are provided on a non-discretionary basis. This means you have the option to implement any of the recommendations we make, and you are not obligated to implement any of

our recommendations. Unless the client engages our Investment Management Services, we do not have any control over the timing or accuracy of any investment transactions executed by the client. Although the financial plan could consider your tax situation or estate plan, we are not an accounting or law firm. We recommend you work closely with your attorney, accountant, or other professionals in implementing your plan. We are happy to work with your professionals to coordinate your financial plan with your estate planning and tax planning needs.

To accommodate different levels of planning needs, our Financial Planning Services are offered as ongoing, project-based, or hourly engagements. Each of these services is described in more detail below.

Comprehensive Financial Planning Services

Our ongoing Comprehensive Financial Planning Services involve working one-on-one with MWM over an extended period of time. This service is designed for individuals seeking a comprehensive financial plan paired with continuous support for implementation, progress monitoring, and plan updates as their circumstances evolve. We will work the client on an ongoing basis to develop an outline of their overall financial picture and lay out their future goals and objectives. This service is only available to clients engaging our Investment Management Services and with at least \$600,000 in assets under management.

Upon engagement, the client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, credit scores/reports, employee benefits, retirement planning, insurance, investments, college planning, and estate planning. Once the client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis, and potential changes to their current situation will be reviewed with them.

The client's financial situation and goals will be monitored throughout the year, and follow-up phone calls and emails will be made to the client to confirm that any agreed-upon action steps have been carried out. There will be an ongoing review of the financial plan to ensure its accuracy and ongoing appropriateness. We will provide assistance with the implementation of our recommendations, update our projections as progress is made toward goals, adjust the plan as the client's financial circumstances change, and answer any questions regarding the plan as they arise.

Project-Based Financial Planning Services

Our Project-Based Financial Planning Services are designed for individuals seeking a financial plan without the need for ongoing implementation or monitoring support. Engagements are structured on a project basis and deliver a one-time, customized financial plan tailored to the client's unique needs. Clients will receive a written or an electronic report, providing a financial plan designed to achieve their stated goals and objectives. With this engagement, we do not provide ongoing review or updates of the financial plan. Clients can implement any planning recommendations or investment transactions on their own.

Hourly Financial Planning Services

Our Hourly Financial Planning Services are designed for individuals seeking guidance on a specific financial topic or question. Engagements are billed hourly and provide a one-time, limited-scope financial plan tailored to their specific needs. Clients will receive a written or an electronic report, providing them with a limited-scope financial plan designed to achieve their stated financial goals and objectives. We will provide analysis and recommendations regarding specific topics, depending on the clients' needs. With this engagement, we do not provide ongoing review or updates of the financial plan. Clients can implement any planning recommendations or investment transactions on their own.

Client-Tailored Services

We offer the same suite of services to all of our clients. However, specific client financial plans and investment strategies and their implementation are dependent upon the client's unique needs and financial situation (such as income, tax levels, and risk tolerance levels). We conduct a data-gathering process to

determine the client's goals and investment objectives, and use that information to construct a client-specific plan or to aid in the selection of a portfolio that matches their restrictions, needs, and targets.

We will contact or attempt to contact you annually to confirm if there have been any changes in your financial situation or investment objectives or determine if you wish to impose or modify account restrictions. Because our advisory services are based on your specific financial circumstances, you are urged to promptly notify us any time you experience changes to your circumstances, so we can determine if any changes to your investment strategy or our recommendations are necessary.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Please note, unless a client has received our Firm Brochure at least 48 hours prior to signing their advisory agreement, the agreement may be terminated by the client within five business days of signing without incurring any penalties or fees.

How we are paid depends on the type of advisory service we provide. Please review the fee and compensation information below. Fees could be negotiable based on factors such as the complexity of your financial situation or total assets under management. Complexity considers various factors of the client's financial circumstances, such as income, assets, liabilities, marital and family status, employment status, and number of financial areas that need to be addressed. In addition, we reserve the right to offer fee waivers or discounts at our sole discretion. Therefore, some clients could pay different fees than the fee schedules shown below. Your exact fee and other terms will be outlined in your advisory agreement.

Advisory Services Fees

Investment Management Services

For our Investment Management Services, the standard advisory fee is based on the market value of the client's assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 – \$1,000,000	0.80%
\$1,000,001 – \$3,000,000	0.50%
\$3,000,001 – \$5,000,000	0.40%
\$5,000,001 – \$10,000,000	0.30%
\$10,000,001 and above	0.20%

This is a blended fee across all aggregated accounts within a household over which MWM has discretion, including cash and cash equivalents. This means that different fees are applied to the different levels of assets as shown in the above chart, resulting in a combined weighted fee. For example, a client household with aggregated accounts valued at \$5,000,000 would pay an effective fee of 0.52% or \$26,000 for the year. The quarterly fee is determined by the following calculation: $((\$1,000,000 \times 0.80\%) + (\$2,000,000 \times 0.50\%) + (\$2,000,000 \times 0.40\%)) \div 4 = \$6,500$.

The minimum annual fee is \$4,800 per year. Fees are prorated and paid in arrears on a quarterly basis, based on the account values as of the last day of the previous quarter. For clients with more than \$600,000 in assets under management, Comprehensive Financial Planning Services are included for no additional fee. Deposits or withdrawals made near the end of billing periods may cause account values used on MWM billing statements to differ from brokerage account statements. Fees are typically directly debited from client accounts, or the client may choose to pay by check or electronic funds transfer.

If there are cash flows of \$10,000 or greater into or out of a client portfolio on any single day in the billing period, that movement of money will be segregated from the rest of the account and charged based on the number of days that money was managed by MWM. For example, if a client transfers \$75,000 into an account three days prior to the quarter end, an adjustment will be made so that \$75,000 will only be charged for the three days that it was managed by MWM.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the number of days remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the account.

Comprehensive Financial Planning Services

Comprehensive Financial Planning Services are only provided in conjunction with Investment Management Services and for clients with more than \$600,000 in assets under management. This service is included in the fee for Investment Management Services outlined above, and no other fees will be charged.

This service may be terminated with 30 days' written notice. Upon termination, the final fee will be prorated based on the number of days remaining in the billing period. After deducting the final fee, the balance of any unearned fee will be refunded to the client promptly.

Project-Based Financial Planning Services

Project-Based Financial Planning Services are offered for a fixed fee, typically ranging between \$500 to \$3,500, based on complexity. The fixed fee will be agreed upon before the start of any work and outlined in your advisory agreement. With this engagement, half of the fee is due at the beginning of the process and the remainder is due at completion of work. However, MWM will not bill an amount of \$1,200 or more six months or more in advance. Fees for this service may be paid by electronic funds transfer or check.

Typically, this engagement will automatically terminate upon completion of the project, or it may be terminated earlier upon written notice. If termination occurs prior to completion of the engagement, the initial half of the fee paid upfront will be non-refundable, and no further fees will be charged.

Hourly Financial Planning Services

Hourly Financial Planning Services are typically offered at a rate of \$250 to \$350 per hour, depending on complexity. The fee is due at completion of the engagement. In the event of early termination by client, any fees for the hours already worked will be due. Fees for this service may be paid by electronic funds transfer or check.

Typically, this engagement will automatically terminate upon completion of the agreed-upon work, or it may be terminated earlier upon written notice. If termination occurs prior to completion of the engagement, the client will be responsible for payment of services provided prior to termination.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses. 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 and electronic fund transfer fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds 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 below further describes the factors that we consider in selecting or recommending broker-dealers for clients' transactions and determining the reasonableness of their compensation (such as commissions).

We 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 charge performance-based fees, which are fees based on a share of capital gains in client accounts. In addition, we do not perform side-by-side management, which refers to the practice of simultaneously managing accounts that pay performance-based fees and those that do not.

Item 7: Types of Clients

We provide Investment Management and Financial Planning Services to individuals, including high net worth individuals.

We do not require a minimum amount of investable assets to receive our services. However, the minimum annual fee for our Investment Management Services is \$4,800 per year and we only provide Comprehensive Financial Planning Services, in conjunction with Investment Management Services, to clients with at least \$600,000 in assets under management.

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

Methods of Analysis

Our primary method of analysis when building client portfolios is Modern Portfolio Theory. Modern Portfolio Theory is a theory of investing that attempts to maximize a portfolio's expected return for a given amount of portfolio risk or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets. Modern Portfolio Theory assumes that investors are risk-averse, meaning that investors will prefer the less risky option given two portfolios that offer the same expected return. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile (that is, if, for that level of risk, an alternative portfolio exists which has better-expected returns).

Investment Strategies

We primarily practice passive investment management as the investment strategy for client portfolios. Passive investing involves building portfolios that are comprised of various distinct asset classes, which are weighted in a manner to achieve a desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio, which are typically index mutual funds or exchange-traded funds. Passive investment management is characterized by low portfolio expenses (that is, 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). Risks of passive investing include limited responsiveness to short-term market fluctuations or economic shifts, potential underperformance relative to actively managed strategies in certain market conditions, and exposure to broad market declines that affect entire asset classes.

Risk of Loss

All investments involve risk and may result in a loss of your original investment, which you should be prepared to bear. While there is risk in all investments, some carry a greater degree of risk or higher costs.

There is no guarantee your investment strategy will result in your goals being met, nor is there any guarantee of profit or protection from loss. Where applicable, we encourage you to read the fund prospectus or other investment offering documents to fully understand the risks associated with each investment.

General Risks

General risks associated with investing include, but are not limited to:

- **Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors, or types of investment. From time to time, these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.
- **Inflation Risk:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.
- **Interest Rate Risk:** Fixed income security 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, and 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.
- **Liquidity Risk:** Certain securities may be less liquid (that is, harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, it may be difficult to sell or liquidate investments at prices considered reasonable or favorable or find buyers at any price.
- **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.
- **Small and Medium Cap Company Risk:** Market capitalization ("cap") is the total value of a company's outstanding shares of stock, which is used to determine a company's size and overall value in the stock market. Securities of companies with small and medium market caps 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 investment portfolio.
- **Strategy Risk:** Investment strategies or techniques may not work as intended.
- **Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the portfolio's performance.

Investment-Specific Risks

Apart from the general risks outlined above, which apply to all types of investments, specific securities may have other risks, including, but not limited to:

- **Bank Obligations:** Bank obligations, including bonds and certificates of deposit, may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.
- **Corporate Bonds:** Corporate bonds are a way for companies to borrow money from investors. Generally, the company pays investors periodic interest and repays the amount borrowed either

periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest. Instead, they are priced at a discount from their face value, and their value increases over time to full value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

- **Exchange-Traded Funds:** Exchange-traded funds ("ETFs") are investment funds that hold a mix of securities, like stocks or bonds, to mirror the performance of a specific market index or commodity. They can track things like stock indexes, industries, bonds, or precious metals. Some ETFs simply follow an index, while others are actively managed. While many ETFs are straightforward, some use complex strategies that may be harder to understand. The value of ETFs can fluctuate due to market conditions, and they are subject to the same risks as the assets they track, such as market volatility or interest rate changes. Some ETFs may have low trading volume, making them harder to buy or sell shares at a desirable price. Actively managed or leveraged ETFs may carry additional risks, including higher costs and more unpredictable price movements.
- **Municipal Bonds:** Municipal bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate, reinvestment, inflation, market, call or redemption, credit, liquidity, and valuation risk.
- **Mutual Funds:** Mutual funds are pooled investment vehicles, including money market instruments, stocks, bonds, or other investments. Professional money managers research, select, and monitor the performance of the securities the fund purchases. It is easier to achieve diversification through ownership of mutual funds than through ownership of individual stocks or bonds. Even with no-load or load-waived funds, there are mutual fund expenses paid to the fund company. Investors could have to pay taxes on capital gains distributions received by the fund but not distributed to the investor. Mutual funds are subject to market risk, meaning their value can rise or fall based on overall market conditions.
- **Stocks:** Stock represents ownership of a company. Its value may go up and down in price quite dramatically and, in the event of an issuer's bankruptcy or restructuring, could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks. Even if a company is profitable, stock prices are subject to market risk, which is attributable to investor attitudes. Stock ownership in more established companies is more conservative, while younger companies provide the most risk and reward opportunities.

Item 9: Disciplinary Information

As a registered investment adviser, MWM is required to disclose material facts about any legal or disciplinary events that could be material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. MWM does not have any legal or disciplinary events regarding our firm or management to disclose.

Item 10: Other Financial Industry Activities and Affiliations

Neither MWM nor any of our supervised persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. In addition, neither MWM nor any of our supervised persons are registered, or have an application pending to register, as a futures commission

merchant, commodity pool operator, commodity trading advisor, or associated person of the foregoing entities.

Based on the services our clients need, we could recommend an unaffiliated registered broker-dealer as the qualified custodian and broker for clients' accounts. We have established a relationship with a custodian to help facilitate our management of client accounts. Further information regarding this custodial relationship is provided in Item 12 below.

Other than the items disclosed above, MWM does not engage in any relationship or arrangement with financial services entities that create any conflicts of interest between us and our clients. MWM only receives compensation directly from our clients for our advisory services. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

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

Code of Ethics

As a fiduciary, our firm and supervised persons have 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. As such, we have adopted a formal Code of Ethics to govern our business practices. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the *Code of Ethics and Standards of Conduct* adopted by the Certified Financial Planner Board of Standards, Inc. Additionally, we accept the obligation not only to comply with the mandates and requirements of all applicable laws and regulations, but to act in an ethical and professionally responsible manner in all professional services and activities.

The Code of Ethics does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield supervised persons from liability for personal trading or other conduct that violates a fiduciary duty to our clients. A summary of the Code of Ethics' principles is outlined below:

- **Integrity:** Supervised persons shall offer and provide professional services with integrity.
- **Objectivity:** Supervised persons shall be objective in providing professional services to clients.
- **Competence:** Supervised 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:** Supervised persons shall perform professional services in a manner that is fair and reasonable and shall disclose conflicts of interest in providing such services.
- **Confidentiality:** Supervised 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:** Supervised persons' conduct in all matters shall reflect credit upon the profession.
- **Diligence:** Supervised 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 supervised 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.

Participation or Interest in Client Transactions

Neither our firm or any of our supervised persons are authorized to recommend to a client or effect a transaction for a client involving any security in which our firm or an associated person has a material

financial interest, such as in the capacity as an underwriter or adviser to the issuer. We do not manage any proprietary funds or private investments, nor do we engage in principal transactions or agency cross transactions.

Personal Trading

Our firm and supervised persons may buy or sell securities the same as, similar to, or different from those we recommend to clients for their accounts. Such transactions could be executed at or around the same time as client transactions. Investing in securities in which clients also invest presents a potential conflict of interest.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading, our Code of Ethics requires our firm and supervised persons to place client interests ahead of their own in all investment decisions and prohibits trading in a manner that disadvantages clients. Further, we may restrict or prohibit certain transactions in the accounts of our firm or supervised persons. Any exceptions or trading pre-clearance must be approved by the firm principal in advance. We maintain required personal securities transactions and holdings records per securities regulations.

Item 12: Brokerage Practices

Factors Used to Select Custodians

MWM does not have an affiliation with any custodian we recommend. Specific custodian recommendations are made to clients 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 (that is, buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (such as wire transfers, check requests, or bill payments);
- Breadth of available investment products (such as stocks, bonds, mutual funds, or exchange-traded funds);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (such as commission rates, margin interest rates, or other fees) and willingness to negotiate the prices;
- Reputation, financial strength, security, and stability; and
- Prior service to us and our clients.

With this in consideration, our firm recommends Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer and member of the Financial Industry Regulatory Authority, Inc. (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). Although clients may request us to use a custodian of their choosing, we generally recommend that clients open brokerage accounts with Schwab to help facilitate our

management of their accounts. The client will ultimately make the final decision of the custodian to be used to hold their investments by signing the selected custodian's account opening documentation.

Research and Other Soft Dollar Benefits

MWM does 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, Schwab may provide us with certain services and products that may benefit us. All such benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like ours. They provide our clients and us with access to their institutional brokerage services (such as trading, custody, reporting, and related services), many of which are not typically available to Schwab retail clients. Schwab also makes available various support services, some of which 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 (that is, we do not have to request them) and at no charge to us. The benefits received by MWM do not depend on the number or value of brokerage transactions directed to Schwab. These services are available to all advisers who participate in the custodial program and are not provided in exchange for us directing client trades to Schwab. Therefore, the services and benefits that we receive from Schwab are not considered soft dollar arrangements.

As part of our fiduciary duties to clients, we must at all times put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by MWM in and of itself creates a potential conflict of interest and may indirectly influence our choice of Schwab for custody and brokerage services. This conflict of interest is mitigated, as we regularly review the factors used to select custodians to ensure our recommendation remains appropriate.

Following is a more detailed description of Schwab's support services:

- **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. These services generally benefit you and your account.
- **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 provides access to client account data (such as duplicate trade confirmations and account statements); facilitates trade execution and allocates aggregated trade orders for multiple client accounts; provides pricing and other market data; facilitates payment of our fees from our clients' accounts; and assists with back-office functions, recordkeeping, and client reporting.
- **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; and publications and conferences on practice management and business succession.
- **Your Brokerage and Custody Costs:** For our clients' accounts that Schwab maintains, they generally do not charge you separately for custody services, but instead are compensated by charging you commissions or other fees on trades that they execute or that settle into your account. Certain trades

(for example, many mutual funds and exchange-traded funds) may not incur commissions or transaction fees.

Brokerage for Client Referrals

We do not receive client referrals from any custodian, broker-dealer, or third-party in exchange for using that custodian, broker-dealer, or third-party.

Clients Directing the Broker-Dealer or Custodian

We do recommend a specific custodian for clients to use. However, clients may custody their assets at a custodian of their choice. We do not direct client trades to a particular broker; all transactions are executed through the custodian that holds the client's account. By allowing clients to choose a specific custodian, we may be unable to achieve the most favorable execution of client transactions, which may cost clients more money over using a lower-cost custodian.

Aggregating Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage, a practice commonly referred to as block trading or order aggregation. 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 supervised persons may participate in block trading with client accounts; however, they will not be given preferential treatment.

Item 13: Review of Accounts

Investment Management Services

Client accounts managed under our Investment Management Service will be reviewed on at least a quarterly basis by Mark Wilson, President and Chief Compliance Officer of MWM. The account is reviewed with regard to the client's investment policies and risk tolerance levels and the account's performance to ensure the applied investment strategy remains appropriate. Events that may trigger a special review would be unusual or volatile performance, additions or deletions of client-imposed restrictions, excessive draw-down, or buy and sell decisions from the firm or per the client's needs.

Clients will receive trade confirmations from their custodian for each transaction in their accounts, as well as monthly or quarterly statements and annual tax reporting statements showing all activity in the accounts, such as receipt of dividends and interest. MWM does not provide any written reports to clients.

Financial Planning Services

For our Ongoing Financial Planning Services, we will review the financial plan and the client's progress towards goals or our recommendations at least annually. Additionally, we will update the financial plan to reflect the client's current financial situation, desired goals, and anticipated future needs.

With our Project-Based and Hourly Financial Planning Services, we typically do not provide any ongoing review, monitoring, or reporting.

Item 14: Client Referrals and Other Compensation

Other than the benefits from custodians disclosed in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third-party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

MWM does not accept custody of client funds or securities. However, we could be deemed to have limited custody when we directly withdraw our advisory fees from client accounts or if we are able to initiate transactions from client accounts to third-parties using a standing letter of authorization.

Deduction of Advisory Fees

Under applicable securities regulations, we are deemed to have custody of client funds or securities if we debit our investment advisory fees directly from client accounts. When MWM directly debits our fee:

- The client will provide written authorization to MWM, permitting us to be paid directly from their accounts held by the custodian.
- MWM will send notice to the custodian of the fee to be deducted at the same time or after we have sent the client an invoice that itemizes the fee.
- The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee deducted.

Clients should receive at least quarterly statements from the qualified custodian that holds and maintains their investment assets. We urge you to carefully review such statements and compare them to the invoices that we may provide to you. Our invoices may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Use of Standing Letters of Authorization

Qualified custodians offer clients the ability to establish a standing letter of authorization (“SLOA”) that allows their adviser to initiate transfers between client accounts at the same custodian, to initiate transfers to external accounts, or to request checks to be distributed from the client’s account. These transactions can be first-party transfers (that is, transfers between internal or external accounts with the same account holder or checks distributed to the client at the client’s address of record) or third-party transfers (that is, transfers or checks to other parties). Under applicable securities regulations, advisers are considered to have custody of client funds and securities if the adviser has the ability to initiate transfers from client accounts to third-parties under a SLOA. However, an adviser is not deemed to have custody in the event of a first-party transaction.

When a client establishes a SLOA for a third-party transfer, we will comply with each of the requirements and conditions outlined below:

- The client will provide instruction to the custodian in writing, which includes their signature, the third-party’s name, and either the third-party’s address or the third-party’s account number at a custodian to which the transfer should be directed.
- The client will authorize us in writing, either on the custodian’s form or separately, to direct transfers to the third-party either on a specified schedule or from time to time.
- The client’s custodian will perform appropriate verification of the instruction, such as a signature review or other method to verify their authorization, and will provide a transfer of funds notice to them promptly after each transfer.

- The client has the ability to terminate or change the instruction with their custodian at any time.
- We have no authority or ability to designate or change the identity, the address, or any other information about the third-party contained in the client's instruction.
- We will maintain records showing that the third-party is not a related party to or located at the same address as our firm or supervised persons.
- The custodian will send the client an initial written notice confirming the instruction and an annual written notice reconfirming the instruction.

Item 16: Investment Discretion

Investment Management Services

For client accounts managed under our Investment Management Services, we maintain discretion over the accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. However, these transactions are subject to the investment strategy we have established with the client. 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. Additionally, the discretionary relationship will be outlined in the advisory agreement signed by the client.

Financial Planning Services

Our recommendations provided under our Financial Planning Services with regard to accounts for which we do not provide Investment Management Services are made on a non-discretionary basis. Clients are responsible for initiating any transactions necessary to implement our recommendations.

Item 17: Voting Client Securities

We acknowledge our fiduciary obligation to vote proxies on behalf of those clients that have delegated to us or for which we are deemed to have proxy voting authority. We will vote proxies on behalf of a client solely in the best interest of that client and have established general policies and procedures for voting proxies. We can also abstain from voting if, based on factors such as expense or difficulty of the exercise, we determine that a client's interests are better served by abstaining. Further, because proxy proposals and individual company facts and circumstances can vary, we can vote in a manner that is contrary to the general guidelines if we believe that doing so would be in a client's best interest. If a proxy proposal presents a conflict of interest between us and a client, then we will disclose the conflict of interest to the client prior to the proxy vote and, if participating in the vote, will vote in accordance with the client's wishes. Clients can obtain a complete copy of the proxy voting policies and procedures by contacting us in writing and requesting such information. Each client can also request information concerning the manner in which proxy votes have been cast with respect to portfolio securities held by the client during the prior annual period.

Item 18: Financial Information

As an investment adviser, we are required to provide certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our clients, and we have not been the subject of a bankruptcy proceeding. We do not have custody of client funds or securities, nor do we require or solicit prepayment of more than \$1,200 in fees per client six months in advance.



MILE WEALTH
MAKING IT LOOK EASY

Form ADV Part 2B – Brochure Supplement

MILE Wealth Management LLC

100 Spectrum Center Drive, Suite 900

Irvine, CA 92618

949-441-4410

www.milewealth.com

March 31, 2026

Mark D. Wilson

President and Chief Compliance Officer

Item 1: Cover Page

This Brochure Supplement provides information about Mark Wilson that supplements the Firm Brochure for MILE Wealth Management LLC (“MWM”). A copy of that Brochure precedes this Supplement. Please contact Mark Wilson if the MWM Brochure is not included with this Supplement or if you have any questions about the contents of this Supplement.

Additional information about Mark Wilson is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using his identification number 3044340.

Item 2: Educational Background and Business Experience

Mark D. Wilson

- **CRD Number:** 3044340
- **Born:** 1966

Educational Background

- **University of California, Irvine:** Bachelor of Science, Information and Computer Science – 1989

Business Experience

- **MILE Wealth Management LLC:** President and Chief Compliance Officer – 4/2017 to Present
- **CapGainsValet LLC:** President – 9/2016 to Present
- **The Tarbox Group, Inc.:** Chief Investment Officer – 9/1997 to 2/2017

Professional Designations, Licensing, and Exams

- **CERTIFIED FINANCIAL PLANNER®:** The CERTIFIED FINANCIAL PLANNER® (“CFP®”) certification is granted by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”) to individuals who meet rigorous professional standards in financial planning. It is a voluntary certification recognized for its emphasis on education, examination, experience, and ethics. To earn the CFP® certification, individuals must complete certain education and experience requirements; pass the CFP® Certification Examination, which tests the application of financial planning knowledge in real-life scenarios; and agree to be bound by the CFP Board’s *Code of Ethics and Standards of Conduct*, which sets forth the ethical and practice standards for CFP® professionals. To maintain their certification, CFP® professionals must complete continuing education requirements every two years, including ethics training, and must renew their commitment to the *Code of Ethics and Standards of Conduct* and their fiduciary obligations. CFP® professionals who fail to comply with the above standards and requirements could be subject to the CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification. For more information, refer to the CFP website at www.cfp.net.

Item 3: Disciplinary Information

Mark Wilson has never been involved in an arbitration claim of any kind or been found liable in any criminal or civil actions, self-regulatory organization proceeding, administrative proceeding, or other hearings or formal adjudications.

Item 4: Other Business Activities

Mark Wilson spends 5% of his time as President of CapGainsValet LLC. The firm provides consulting services as an independent contractor to registered investment advisory firms and runs a website that provides publicly available mutual fund information to investors.

Item 5: Additional Compensation

As the owner of MWM, Mark Wilson receives economic benefit from the overall profitability of the firm, but he does not receive any additional compensation from non-clients for providing advisory services.

Item 6: Supervision

Mark Wilson, as President and Chief Compliance Officer of MWM, is responsible for supervision. Supervision is administered through the application of and adherence to written policies and procedures. He may be contacted at 949-441-4410.