

## Item 1: Cover Page

# Wildflower Financial LLC

120 Church Street  
Santa Cruz, CA 95060

### **Form ADV - Part 2A - Firm Brochure**

831-854-7291

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

Dated January 23, 2023

This Brochure provides information about the qualifications and business practices of Wildflower Financial LLC, "Wildflower Financial". If you have any questions about the contents of this Brochure, please contact us at 831-854-7291. 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.

Wildflower Financial LLC is a State of California registered investment advisor. Registration of an investment advisor does not imply any level of skill or training. The oral and written communications of an advisor provide you with information about which you determine to hire or retain an advisor.

Additional information about Wildflower Financial LLC is available on the SEC's website at [www.Adviserinfo.sec.gov](http://www.Adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Wildflower Financial LLC is 289288.

## Item 2: Material Changes

The last annual update of this Brochure was filed on March 10, 2022. Since this filing, there have been no reported changes. In the future, any material changes made during the year will be reported here.

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Wildflower Financial LLC.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 289288.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at 831-854-7291.

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## Item 4: Advisory Business

### Description of Advisory Firm

Wildflower Financial LLC is registered as an Investment Adviser with the state of California. We may operate under the name Wildflower Financial. The firm was founded in August 2017.

Jennifer Lommen, CFP is the founder and sole owner of the firm. Wildflower Financial LLC is strictly a fee-only financial planning and investment management firm. Wildflower Financial LLC is a “fiduciary” when the firm’s services are subject to the provisions of ERISA of 1974, as amended. Wildflower Financial LLC reports no discretionary and \$5,525,602 in non-discretionary Assets Under Management as of December 31, 2022.

### Description of Advisory Services

#### **Comprehensive Financial Life Planning**

Wildflower Financial LLC provides comprehensive financial life planning for a flat annual fee. Clients have the opportunity to participate in regularly scheduled and impromptu meetings throughout the term of the engagement, depending on their individual situation.

Comprehensive financial life planning is a holistic process by which the advisor and client engage in a series of visioning exercises and conversations designed to help clarify the unique financial and life goals of each client. This serves to guide the advisor in the technical development and implementation of all aspects of the financial plan in order to ensure that the financial advice offered aligns with the goals the client has set forth within the comprehensive process. Comprehensive financial life planning fees are outlined in Item 5 of this brochure.

The intention of a comprehensive financial life planning engagement is to develop an ongoing relationship between client and advisor in order to address all of the clients financial and life changes, goals and concerns as they evolve over time.

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

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, work as an independent contractor or are planning for an exit from their current business. Under this type of engagement, 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 what we believe to be 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, plus strategies to save desired amounts.
- **College Savings:** 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. Recommendations as to savings strategies are included, 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 (if appropriate).
- **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 when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients 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:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' 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 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically 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 (e.g., working longer, saving more, spending less, 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 ("self-insuring").
- **Divorce Planning:** Separation or divorce can impact financial goals and plans. We can work with clients to help them gain an understanding your changed financial situation and provide context and information that may be useful to you as you engage with legal counsel. We can assist in cash flow and budgeting projections, net worth analysis, future income, property division and tax consequences related to decisions made during the divorce and separation process.
- **Tax Planning Strategies:** 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 account(s) 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 you wish to hire someone for such purposes.

### **Focused Financial Planning**

Focused financial planning involves a more limited engagement than comprehensive financial life planning. If a client desires to focus on only a small number of pressing financial topics, services are available on a flat fee basis. Not all situations are suitable for a focused financial planning engagement. If a focused financial planning session is appropriate, both client and advisor will work together to clearly define the scope of the engagement and topics to be covered. The client will be required to provide information necessary to complete the planning as defined in the engagement. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. A one-time meeting is scheduled in order to review all of the findings and recommendations made in the plan and to allow adequate time for questions. Clients are offered an opportunity for limited follow-up questions as they pertain to the specifics of the focused financial planning engagement. Fees pertaining to this service are outlined in Item 5 of this brochure. Ongoing monitoring, implementation assistance, and investment management are NOT included in a focused financial planning engagement.

### **Investment Management**

Clients who engage Wildflower Financial for comprehensive financial life planning services may additionally request investment management services. These services include initial and ongoing consultation with clients to determine risk tolerance, time horizon and other factors that may impact the client’s goals, values, needs and objectives. We work closely with each client to develop an appropriate investment policy statement that includes goals, liquidity needs, time horizon, risk tolerance, tax considerations and asset allocation targets. We also discuss a

client's prior investment history, family composition and other factors that may be relevant in the creation of a customized investment policy. Wildflower Financial does not offer investment management services to clients requesting a focused financial plan or as a stand alone offering.

Account supervision is guided by the stated objectives of the client (e.g., 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. In performing investment management services, Wildflower Financial operates on a non-discretionary basis, wherein the client authorizes each implementation of the recommendation we make. Fees pertaining to this service are outlined in Item 5 of this brochure.

### **Educational Seminars and Speaking Engagements**

We may provide seminars on an "as announced" basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual's person's need, nor does Wildflower Financial does not provide individualized investment advice to attendees during these seminars. Fees associated with these engagements are detailed in Item 5 below.

### **Wrap Fee Programs**

We do not participate in wrap fee programs.

### **CCR Section 260.235.2 Disclosure**

For clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our client. The client is under no obligation to act upon our recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through our firm.



## Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Wildflower Financial LLC is a fee-only financial planning firm. We are compensated exclusively through the fees we receive directly from our clients. We do not accept any sales commissions, referral fees or other forms of compensation from any third parties.

### Comprehensive Financial Life Planning

The fee for comprehensive financial life planning consists of an initial fee of \$0 - \$5,000, depending on the complexity of the client's financial and life situation and an ongoing annual fee that may be paid monthly or quarterly, in advance. The annual fee is based on complexity. The ongoing annual fee range is between \$6,000 and \$30,000 per year (\$500 and \$2,500 per month). Fees are negotiable prior to signing of the agreement and are calculated annually and are based on the client's total income, assets and the overall complexity of the client's financial situation. Fees are billed in advance and can be billed monthly or quarterly, per client preference, with the exception of investment management clients who choose to have fees withdrawn from investment accounts, in which case fees will be billed quarterly. The first monthly/quarterly fee is due upon executing our engagement agreement. Wildflower Financial will not bill an amount more than \$500 more than six months in advance. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

### Focused Financial Planning

Fees for focused financial planning services, as described in Item 4 of this brochure consist of an upfront flat fee of \$1,500 to \$7,500. Fees are negotiable prior to signing of the agreement

and are calculated based on the overall complexity of the client's financial situation and topic areas covered in the focused financial plan. 50% of the fee shall be due upon signing of the agreement and the remaining 50% shall be due upon completion and delivery of the focused financial plan. Wildflower Financial will not bill an amount more than \$500 more than six months in advance. Termination of the agreement must be made in writing by the client within 72 hours of signing of the agreement, in which case the paid portion of the fee will be refunded to the client. Beyond the initial 72 hour period, there is an expectation that the fee will be paid in full upon delivery of the plan.

### Hourly Rate

In special circumstances and upon consent of Jennipher Lommen, financial planning services may otherwise be offered on an hourly basis at a rate of \$300 per hour. Wildflower Financial LLC will not bill an amount above \$500 more than 6 months in advance. Hourly consultation is always in person and fees are due at the end of each in person hourly session.

### Investment Management

Clients who engage Wildflower Financial for comprehensive and ongoing financial planning services may additionally request investment management services, as described in Item 4 of this brochure. Fees for these services are included in the ongoing retainer fee calculation and are not based on a percentage of assets under management. Investment management clients will have the option of having their ongoing subscription fee drawn from their investment account on a quarterly, not monthly, basis. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client.

### Educational Seminars and Speaking Engagements

#### **Educational Seminars/ Speaking engagements**

Seminars are offered to organizations and the public on a variety of financial topics. Fees range from free to \$1,000 per seminar or free to \$200 per participant. Half of the fees are due prior to the engagement, and the other half is to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, the number of

hours of preparation needed, and the number of attendees. In the event of inclement weather or flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred.

In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide payment for 50% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

### **Speaking Engagements**

Jennipher Lommen is a public speaker. Generally, fees for her speaking engagements range from free to \$10,000 plus travel expenses, depending on sponsor, date, location, and program requested. For all speeches, 50% of the balance is due before the event and the remaining balance due at the conclusion of the event. Half of the fees are due prior to the engagement, and the other half is to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. The content is based on topics that are currently relevant in the financial planning environment.

In the event of inclement weather or flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred. In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred, and will provide

payment for 50% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Educational Seminars and Speaking Engagements may be provided pro-bono at Wildflower Financial's discretion.

### Other Types of Fees and Expenses

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

### CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

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

We do not offer performance-based fees.

## Item 7: Types of Clients

Wildflower Financial LLC provides financial planning and investment advisory services primarily to individuals and families and high net worth individuals and families. We maintain no minimum net worth or asset requirements.

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

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes 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. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

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

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

Wildflower Financial offers investment advice that is based on a globally diversified strategy involving a disciplined, research based approach that manages risk through appropriate asset allocation. We create portfolios that use low-cost investments that are diversified, tax efficient and appropriate for a client's overall risk tolerance, current financial situation and financial goals.

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

## **Material Risks:**

**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.

**Passive Market Strategies Risk:** Should a portfolio employ a passive, efficient markets approach, an investor will need to consider the potential risk that the broader allocation may at times generate lower-than-expected returns than that from a specific asset, and that the return on each type of asset is a deviation from the average return for the asset class. It is felt that this variance from the "expected return" is generally low under normal market conditions if the portfolio is made up of diverse, low or non-correlated assets.

**Research Data Risk:** When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

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

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer

maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

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

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

**Socially Conscious Investing Risk:** If you require your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well diversified among various asset classes. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

### **Securities Risks:**

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

**Common stocks** 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.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay 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, but rather are priced at a discount from their face values and their values accrete over time to face 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.

**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.

**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 risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

**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. The Adviser has no control over the risks taken by the underlying funds in which client's invest.



## Item 9: Disciplinary Information

### Criminal or Civil Actions

Wildflower Financial LLC and its management have not been involved in any criminal or civil action.

### Administrative Enforcement Proceedings

Wildflower Financial LLC and its management have not been involved in administrative enforcement proceedings.

### Self-Regulatory Organization Enforcement Proceedings

Wildflower Financial LLC and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Wildflower Financial LLC or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

No Wildflower Financial employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Wildflower Financial employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Wildflower Financial LLC does not have any related parties. As a result, we do not have a relationship with any related parties.

Wildflower Financial LLC only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Wildflower Financial LLC does not select other advisors for clients.

### Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding Wildflower Financial LLC, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

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

As a fiduciary, our firm and its associates 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. 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 Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### Code of Ethics Description

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

**Integrity** - Associated persons shall offer and provide professional services with integrity.

**Objectivity** - Associated persons shall be objective in providing professional services to clients.

**Competence** - Associated 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** - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.

**Confidentiality** - Associated 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** - Associated persons' conduct in all matter shall reflect credit of the profession.

**Diligence** - Associated persons shall act diligently in providing professional services. We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

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

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

### **Trading Securities At/Around the Same Time as Client’s Securities**

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as clients. We will not trade non-mutual fund securities 5 days prior to the same security for clients.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Custodians and/or Broker-Dealers**

Wildflower Financial LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

#### **1. Research and Other Soft-Dollar Benefits**

We currently do not receive soft dollar benefits.

#### **2. Brokerage for Client Referrals**

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

#### **3. Clients Directing Which Broker/Dealer/Custodian to Use.**

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients money over using a lower-cost custodian.

## Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Jennipher Lommen, Principal and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs. Additionally, clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Financial Planning clients who do not engage Wildflower Financial for Investment management, may request a review of an existing portfolio as part of the financial planning process.

## Item 14: Client Referrals and Other Compensation

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

Wildflower Financial LLC does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which Wildflower Financial LLC directly debits their advisory fee:

- I. Wildflower Financial LLC will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- II. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.

- III. The client will provide written authorization to Wildflower Financial LLC, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Advisor is not affiliated with the custodian. The custodian does not supervise the advisor, its agents or activities.

## Item 16: Investment Discretion

At the client's request, Wildflower Financial may execute the sale and/or purchase of investments where authorized to do so by the client on a non-discretionary basis. Non-discretion refers to the requirement to obtain client approval prior to initiating any investment transactions on the client's behalf. This individual trading authorization is in addition to a limited power of attorney granting us limited access to your accounts. When selecting securities and determining amounts, Wildflower Financial observes the investment policies of the clients for which it advises.

## Item 17: Voting Client Securities

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

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

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with 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 clients, and we have not been the subject of a bankruptcy proceeding. We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

## Item 19: Requirements for State-Registered Advisors

Jennipher Sue Lommen

Born: 1971

### Educational Background

Bachelor of Arts, Women's Studies, University of California at Santa Cruz (1993)

### Business Experience

- 06/2017 - Present, Wildflower Financial LLC, Owner & CCO
- 09/2014 - 06/2017, Natural Bridges Financial Advisors, Financial Advisor
- 12/2013 - 04/2015, H&R Block, Tax Preparer
- 06/2006 - 12/2013, Homemaker
- 06/2004 - 06/2006, Santa Cruz Waldorf High School, School Administrator

### Professional Designations, Licensing & Exams

- CERTIFIED FINANCIAL PLANNER™ Professional, Certified Financial Planner Board of Standards, Inc.
- Enrolled Agent (EA), National Association of Enrolled Agents
- Registered Life Planner® (RLP®)

See description of these designations in Item 2 of the ADV Part 2B below.

#### Other Business Activities

Jennipher Sue Lommen is not involved in any outside business activities.

#### Performance Based Fees

Wildflower Financial is not compensated by performance-based fees.

#### Material Disciplinary Disclosures

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

#### Material Relationships That Management Persons Have With Issuers of Securities

Neither Wildflower Financial LLC, nor Jennipher Sue Lommen, have any relationship or arrangement with issuers of securities.

#### Additional Compensation

Jennipher Sue Lommen does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Wildflower Financial LLC.

#### Supervision

Jennipher Sue Lommen, as Owner and Chief Compliance Officer of Wildflower Financial LLC, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

#### Requirements for State Registered Advisers

Jennipher Sue Lommen has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



### Conflicts of Interest

Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the client prior to entering into any Advisory or Financial Planning Agreement.

### Business Continuity Plan

Wildflower Financial LLC maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including death of the investment adviser or any of its representatives.

# Item 1: Cover Page - ADV Part 2B

## Wildflower Financial LLC

120 Church Street  
Santa Cruz, CA 95060  
January 23, 2023

831-854-7291

### Form ADV Part 2B – Brochure Supplement

*For:*

Jennipher Sue Lommen, CRD# 6595879  
Owner and Chief Compliance Officer

This brochure supplement provides information about Jennipher Sue Lommen that supplements the Wildflower Financial LLC (“Wildflower Financial”) brochure. A copy of that brochure precedes this supplement. Please contact Jennipher Lommen if the Wildflower Financial brochure is not included with this supplement or if you have any questions about the contents of this supplement. Additional information about Jennipher Lommen is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6595879.

# Item 2: Educational Background and Business Experience

Jennipher Sue Lommen

Born: 1971

## Educational Background

Bachelor of Arts, Women's Studies, University of California at Santa Cruz (1993)

## Business Experience

- 06/2017 - Present, Wildflower Financial LLC, Owner & CCO
- 09/2014 - 06/2017, Natural Bridges Financial Advisors, Financial Advisor
- 12/2013 - 04/2015, H&R Block, Tax Preparer
- 06/2006 - 12/2013, Homemaker
- 06/2004 - 06/2006, Santa Cruz Waldorf High School, School Administrator

## Professional Designations, Licensing & Exams

- **Registered Life Planner® (RLP®):** The RLP designation is administered by the Kinder Institute of Life Planning and denotes an adviser with advanced training in client relationship skills and holistic financial advice. RLPs learn a structured client interview process that gives them a greater ability to discover a client's values and life goals. This allows RLPs to develop financial recommendations and strategies that better serve the client's long-term interests. Initial requirements include: 1. Two-day workshop: The Seven Stages of Money Maturity 2. Five-day workshop: Advanced EVOKE™ Training 3. Six-month mentorship that includes further EVOKE™ training through case studies, peer reviews and support, group conference calls led by experienced RLP mentors, and one-on-one guidance from experienced RLP mentors. In addition, planners must adhere to Kinder Institute's code of ethics standards.
- **CFP (Certified Financial Planner)®:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical

requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

**Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

**Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

**Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

**Ethics** – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

**Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

**Ethics** – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

**Enrolled Agent:** An Enrolled Agent (EA) is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S.

Department of the Treasury to represent taxpayers before all administrative levels of the Internal Revenue Service for audits, collections, and appeals. The license is earned in

one of two ways, by passing a comprehensive examination which covers all aspects of the tax code, or having worked at the IRS for five years in a position which regularly interpreted and applied the tax code and its regulations. All candidates are subjected to a rigorous background check conducted by the IRS. The IRS Restructuring and Reform Act of 1998 allow federally authorized practitioners (those bound by the Department of Treasury's Circular 230 regulations) a limited client privilege. This privilege allows confidentiality between the taxpayer and the Enrolled Agent under certain conditions. The privilege applies to situations in which the taxpayer is being represented in cases involving audits and collection matters. It is not applicable to the preparation and filing of a tax return. This privilege does not apply to state tax matters, although a number of states have an accountant-client privilege. In addition to the stringent testing and application process, the IRS requires Enrolled Agents to complete 72 hours of continuing professional education, reported every three years, to maintain their Enrolled Agent status. National Association of Enrolled Agents (NAEA) members are obligated to complete 90 hours per three year reporting period. Because of the knowledge necessary to become an Enrolled Agent and the requirements to maintain the license, there are only about 46,000 practicing Enrolled Agents. Only Enrolled Agents are required to demonstrate to the IRS their competence in matters of taxation before they may represent a taxpayer before the IRS. Unlike attorneys and CPAs, who may or may not choose to specialize in taxes, all Enrolled Agents specialize in taxation. Enrolled Agents are the only taxpayer representatives who receive their right to practice from the U.S. government (CPAs and attorneys are licensed by the states). Enrolled Agents are required to abide by the provisions of the Department of Treasury's Circular 230, which provides the regulations governing the practice of Enrolled Agents before the IRS. NAEA members are also bound by a Code of Ethics and Rules of Professional Conduct of the Association.

### Item 3: Disciplinary Information

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

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

Jennipher Sue Lommen is not involved in any outside business activities.

## **Item 5: Additional Compensation**

Jennipher Sue Lommen does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Wildflower Financial LLC.

## **Item 6: Supervision**

Jennipher Sue Lommen, as Owner and Chief Compliance Officer of Wildflower Financial LLC, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

## **Item 7: Requirements for State Registered Advisers**

Jennipher Sue Lommen has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.