

## **Firm Brochure**

(Part 2A of Form ADV)



**9115 SW Oleson Rd, Suite 200**

**Portland, OR 97223**

**P: (503) 808-9404**

**F: (503) 808-9223**

**[www.millerfinancial.biz](http://www.millerfinancial.biz)**

**February 9, 2023**

This brochure provides information about the qualifications and business practices of Miller Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at: (503) 808-9404, or by e-mail at: [todd@millerfinancial.biz](mailto:todd@millerfinancial.biz) or [ben@millerfinancial.biz](mailto:ben@millerfinancial.biz). 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.

Miller Financial Group, LLC is a Registered Investment Advisor. The title of “registered investment adviser” does not imply a certain level of skill or training.

Additional information about Miller Financial Group, LLC is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Miller Financial Group, LLC is 139249.

## **Item 2: Material Changes**

---

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. The previous annual amendment to the Form ADV Part 2 was dated March 14, 2022.

---

### **Material Changes since the Last Annual Update**

None.

---

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, at no charge, please contact us by telephone at: 503-808-9404 or by e-mail at: [todd@millerfinancial.biz](mailto:todd@millerfinancial.biz) or [ben@millerfinancial.biz](mailto:ben@millerfinancial.biz).

## Item 3: Table of Contents

<b>Item 1: Cover Page</b> .....	i
<b>Item 2: Material Changes</b> .....	ii
<b>Annual Update</b> .....	ii
<b>Material Changes since the Last Annual Update</b> .....	ii
<b>Full Brochure Available</b> .....	ii
<b>Item 3: Table of Contents</b> .....	iii
<b>Item 4: Advisory Business</b> .....	1
<b>Firm Description</b> .....	1
<b>Principal Owners</b> .....	1
<b>Types of Advisory Services</b> .....	2
<b>Tailored Relationships</b> .....	2
<b>Types of Agreements</b> .....	2
<b>Financial Planning Agreement</b> .....	2
<b>Advisory Service Agreement</b> .....	3
<b>Asset Management</b> .....	4
<b>Termination of Agreement</b> .....	4
<b>Item 5: Fees and Compensation</b> .....	4
<b>Description</b> .....	4
<b>Fee Billing</b> .....	4
<b>Other Fees</b> .....	5
<b>Expense Ratios</b> .....	5
<b>Past due Accounts and Termination of Agreement</b> .....	5
<b>Item 6: Performance-Based Fees</b> .....	6
<b>Sharing of Capital Gains</b> .....	6
<b>Item 7: Types of Clients</b> .....	6
<b>Description</b> .....	6
<b>Account Minimums</b> .....	6
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	6
<b>Methods of Analysis</b> .....	6
<b>Investment Strategies</b> .....	7
<b>Risk of Loss</b> .....	7

<b>Item 9: Disciplinary Information</b> .....	8
<b>Legal and Disciplinary</b> .....	8
<b>Item 10: Other Financial Industry Activities and Affiliations</b> .....	8
<b>Financial Industry Activities</b> .....	8
<b>Affiliations</b> .....	8
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> .....	9
<b>Code of Ethics</b> .....	9
<b>Participation or Interest in Client Transactions</b> .....	9
<b>Personal Trading</b> .....	9
<b>IRA Rollover Considerations</b> .....	9
<b>Item 12: Brokerage Practices</b> .....	11
<b>Selecting Brokerage Firms</b> .....	11
<b>Best Execution</b> .....	11
<b>Soft Dollars</b> .....	11
<b>Order Aggregation</b> .....	11
<b>Item 13: Review of Accounts</b> .....	12
<b>Periodic Reviews</b> .....	12
<b>Review Triggers</b> .....	12
<b>Regular Reports</b> .....	12
<b>Item 14: Client Referrals and Other Compensation</b> .....	12
<b>Incoming Referrals</b> .....	12
<b>Referrals Out</b> .....	12
<b>Item 15: Custody</b> .....	12
<b>Custody</b> .....	12
<b>Account Statements</b> .....	13
<b>Performance Reports</b> .....	13
<b>Item 16: Investment Discretion</b> .....	13
<b>Discretionary Authority for Trading</b> .....	13
<b>Limited Power of Attorney</b> .....	13
<b>Item 17: Voting Client Securities</b> .....	13
<b>Proxy Votes</b> .....	13
<b>Item 18: Financial Information</b> .....	14

<b>Financial Condition .....</b>	<b>14</b>
<b>Item 19: Requirements for State-Registered Advisers.....</b>	<b>14</b>
<b>Requirements for State-Registered Advisers .....</b>	<b>14</b>
<b>Ben Newell.....</b>	<b>16</b>
<b>Todd Newell.....</b>	<b>17</b>

## Item 4: Advisory Business

---

### **Firm Description**

Miller Financial Group, LLC (“Miller Financial”, “we” or “us”) was founded in 2012. It is a successor to Bruce W Miller dba Miller Financial Group which was founded in 1984. It was purchased by Ben Newell and Todd Newell on January 3, 2017.

Miller Financial follows strict fiduciary standards, putting our clients’ interests before our own and seeking to avoid conflicts of interest with our clients. We provide personalized confidential financial planning and investment management to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, investment management, education funding, retirement planning, and estate planning.

Miller Financial is strictly a fee-only financial planning and investment management firm. The firm does not receive commissions for purchasing or selling annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

Investment advice is an integral part of financial planning. In addition, Miller Financial advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment decisions are made by Miller Financial. On some occasions, client input is taken into account in making investment decisions. Miller Financial does not act as a custodian of client assets. The client always maintains asset control. Miller Financial places trades for clients under a limited power of attorney.

A written evaluation of each client’s initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client.

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

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

---

### **Principal Owners**

Ben Newell and Todd Newell are equal owners and principals of the firm. Ben Newell is the Chief Investment Officer and Todd Newell is the Chief Operations Officer.

---

### **Types of Advisory Services**

Miller Financial provides investment supervisory services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations and issues charts, graphs, formulas, or other devices which clients may use to evaluate securities.

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

Miller Financial provides a timing service. At certain times the advisor feels that there is a higher degree of risk to the marketplace, the advisor may make allocation changes which might include up to 100% in cash or money market accounts, or other market neutral type of investment products.

As of December 31, 2022, Miller Financial manages approximately \$65,288,540 in discretionary assets under management.

---

### **Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

---

### **Types of Agreements**

The following agreements define the typical client relationships.

---

#### **Financial Planning Agreement**

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. Fees are based upon time spent at a rate of \$250 per hour.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. Follow-up implementation work is billed separately at the rate of \$250 per hour.

---

### **Advisory Service Agreement**

A client may choose to have Miller Financial manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed, including those of their children. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; investment management (including performance reporting); education planning; retirement planning; estate planning; and tax planning, as well as the implementation of recommendations within each area.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

- 1.60% - on the first \$100,000;
- 1.40% - on the next \$150,000 (from 100,001 to 250,000); and
- 1.20% - on the next \$250,000 (from 250,001 to 500,000); and
- 1.00% - on the next \$500,000 (from 500,001 to 1,000,000); and
- .75% - on the assets above \$1,000,000.

The minimum account size is generally \$500,000. Fees are negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. Amendment of the agreement without prior written consent is prohibited. The client or Miller Financial may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

## **Asset Management**

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. Miller Financial does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through Miller Financial.

---

## **Termination of Agreement**

A client may terminate any of the aforementioned agreements at any time by notifying Miller Financial in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If a client does not receive a brochure at least 48 hours prior to entering into the investment advisory agreement, the advisory client has the right to terminate the contract without penalty within five business days. If the client made an advance payment, Miller Financial will refund any unearned portion of the advance payment.

Miller Financial may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, Miller Financial will refund any unearned portion of the advance payment.

## **Item 5: Fees and Compensation**

---

### **Description**

Miller Financial bases its fees on a percentage of assets under management or hourly charges. Refer to Financial Planning Agreement and Advisory Services Agreement above for a schedule of fees.

---

### **Fee Billing**

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Advisory Service Agreement fees are calculated on a formula basis and may be adjusted for complexity of individual situations.

For clients residing in Washington State, we will send a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. We will also include the name of the custodian(s) on your fee invoice. This information will be sent to you concurrent with the request for payment or payment of our advisory fees. We urge you to compare this information with the fees listed in the account statement.

---

### **Other Fees**

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

Fees are generally negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

---

### **Expense Ratios**

Mutual funds and Exchange-Traded Funds (ETFs) generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company or ETF charges 0.5% for their services. These fees are in addition to the fees paid by you to Miller Financial.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

---

### **Past due Accounts and Termination of Agreement**

Miller Financial reserves the right to stop work on any financial planning engagements that are more than 60 days overdue. In addition, Miller Financial reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Miller Financial's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 60 days.

## Item 6: Performance-Based Fees

---

### Sharing of Capital Gains

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

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

## Item 7: Types of Clients

---

### Description

Miller Financial generally provides investment advice to individuals, pension and profit-sharing plans, trusts, estates, or charitable organizations, corporations or business entities. Because each client is unique, they must be willing to be involved in the planning and ongoing processes. Such involvement does not have to be time-consuming, however we want our clients to remain informed and have a sense of security about their investments.

Client relationships vary in scope and length of service.

### Account Minimums

The minimum account size is \$500,000 of assets under management for new accounts and is cumulative of all investment accounts of a family unit.

Miller Financial has the discretion to waive the account minimum. Accounts of less than \$500,000 may be set up when the client and Miller Financial anticipate the client will add additional funds to the accounts bringing the total to \$500,000 within a reasonable time. Other exceptions will apply to employees of Miller Financial and their relatives, or relatives of existing clients.

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

---

### Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that Miller Financial may use include Barron's, Valueline, AAI Research Data, Stock Investor Pro stock information, Standard and Poor's Market Research, Briefing.com and various internet sources.

---

### **Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. This means that we use passively managed index and exchange-traded funds as the core investments, and then add actively managed funds, stocks and bonds where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, short sales, and margin transactions.

---

### **Risk of Loss**

We use our best judgement and good faith efforts in rendering services to our clients. Because all investment programs have certain risks that are borne by the investor, we cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Except as may otherwise be provided by law, we are not liable to clients for:

- Any loss that clients may suffer by reason of any investment recommendation we made with that degree of care, skill, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; or
- Any independent act or failure to act by a custodian of client accounts.

It is the responsibility of the client to give us complete information and to notify us of any changes in their financial circumstances or goals.

## **Item 9: Disciplinary Information**

---

### **Legal and Disciplinary**

Miller Financial and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10: Other Financial Industry Activities and Affiliations**

---

### **Financial Industry Activities**

Miller Financial has no other industry activities.

### **Affiliations**

Other than a custodial relationship with TD Ameritrade and certain insurance companies that provide no-load annuity products, Miller Financial has no arrangements or affiliations that are material to its advisory business.

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

---

### **Code of Ethics**

The employees of Miller Financial have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

---

### **Participation or Interest in Client Transactions**

Miller Financial and its employees do not own or manage any companies or investments that we advise our clients to buy. However, we may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of Miller Financial's Compliance Manual.

---

### **Personal Trading**

The Chief Compliance Officer of Miller Financial is Todd Newell. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

---

### **IRA Rollover Considerations**

As part of our investment advisory services to you, we may recommend that you roll assets from your employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account (collectively, a "Plan Account"), to an individual retirement account, such as a SIMPLE IRA, SEP IRA, Traditional IRA, or Roth IRA (collectively, an "IRA Account") that we will manage on your behalf. We may also recommend rollovers from IRA Accounts to Plan Accounts, from Plan Accounts to Plan Accounts, and from IRA Accounts to IRA Accounts. When we provide any of the foregoing rollover recommendations we are acting as fiduciaries within the meaning of Title I of the ERISA and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts.

If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the advisory agreement you executed with our firm. This creates a conflict of interest because it creates a financial incentive for our firm to recommend the rollover to you (*i.e.*, receipt of additional fee-based compensation). You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm. Due to the foregoing conflict of interest, when we make rollover recommendations, we operate under a special rule that requires us to act in your best interests and not put our interests ahead of yours.

Under this special rule's provisions, we must:

- meet a professional standard of care when making investment recommendations (give prudent advice);
- never put our financial interests ahead of yours when making recommendations (give loyal advice);
- avoid misleading statements about conflicts of interest, fees, and investments;
- follow policies and procedures designed to ensure that we give advice that is in your best interests;
- charge no more than a reasonable fee for our services; and
- give you basic information about conflicts of interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of a rollover.

Note that an employee will typically have four options in this situation:

1. leaving the funds in your employer's (former employer's) plan;
2. moving the funds to a new employer's retirement plan;
3. cashing out and taking a taxable distribution from the plan; or
4. rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide you with a written explanation of the advantages and disadvantages of both account types and the basis for our belief that the rollover transaction we recommend is in your best interests.

As an alternative to providing you with a rollover recommendation, we may instead take an entirely educational approach in accordance with the U.S. Department of Labor's Interpretive Bulletin 96-1. Under this approach, our role will be limited only to providing you with general educational materials regarding the pros and cons of rollover transactions. We will make no recommendation to you regarding the prospective rollover of your assets and you are advised to speak with your trusted tax and legal advisors with respect to rollover decisions. As part of this educational approach, we may provide you with materials discussing some or all of the following topics: the general pros and cons of rollover transactions; the benefits of retirement plan participation; the impact of pre-retirement withdrawals on retirement income; the investment options available inside your Plan Account; and high level discussion of general investment concepts (e.g., risk versus return, the benefits of diversification and asset allocation, historical returns of certain asset classes, etc.). We may also provide you with questionnaires and/or interactive investment materials that may provide a

means for you to independently determine your future retirement income needs and to assess the impact of different asset allocations on your retirement income. You will make the final rollover decision.

## **Item 12: Brokerage Practices**

---

### **Selecting Brokerage Firms**

Miller Financial does not have any affiliation with product sales firms. Our clients' assets are held by independent third-party custodians. Specific custodian recommendations are made to clients based on their need for such services. Miller Financial recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Generally speaking, Miller Financial recommends that clients establish custodial brokerage accounts with TD Ameritrade Institutional, a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors like us services which include custody of securities, trade execution, clearance and settlement of transactions. We work with TD Ameritrade primarily for administrative convenience and also because TD Ameritrade offers a good value to our clients for the transaction costs and other costs incurred. Miller Financial recommends insurance companies who specialize in no-load or low-load annuity products.

Miller Financial does not receive fees or commissions from any of these arrangements.

---

### **Best Execution**

Miller Financial reviews the execution of trades at each custodian periodically. The review process is documented in Miller Financial's Compliance Manual. Trading fees charged by the custodians is also reviewed periodically. Miller Financial does not receive any portion of the trading fees.

---

### **Soft Dollars**

Miller Financial does not receive soft dollar benefits.

---

### **Order Aggregation**

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## **Item 13: Review of Accounts**

---

### **Periodic Reviews**

Account reviews are performed quarterly by Ben Newell and Todd Newell, Owners and Principals. Account reviews are performed more frequently when market conditions dictate.

---

### **Review Triggers**

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

---

### **Regular Reports**

Investment advisory clients receive periodic communications on at least a quarterly basis. The written updates may include a net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives.

---

## **Item 14: Client Referrals and Other Compensation**

---

### **Incoming Referrals**

Miller Financial has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

---

### **Referrals Out**

Miller Financial does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

---

## **Item 15: Custody**

---

### **Custody**

With the exception of having the ability to debit fees from client accounts, Miller Financial does not maintain custody of client funds. Clients provide written authority to have fees debited from their accounts when they review and sign our Investment Advisory Agreement. Clients also provide the custodian authority to release fee payments from their accounts when they sign the custodial account application.

---

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Miller Financial shall have no liability to the client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation (“SIPC”) or any other insurance which may be carried by the custodian. The client understands that SIPC provides only limited protection for the loss of property held by a custodian.

---

### **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Miller Financial.

## **Item 16: Investment Discretion**

---

### **Discretionary Authority for Trading**

Miller Financial accepts discretionary authority to manage securities accounts on behalf of clients. Miller Financial has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, Miller Financial consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. Miller Financial does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

---

### **Limited Power of Attorney**

A limited power of attorney gives trading authorization. The client must sign a limited power of attorney so that we may execute trades on their behalf.

## **Item 17: Voting Client Securities**

---

### **Proxy Votes**

Miller Financial does not vote proxies on securities. Clients may vote their own proxies. When assistance on voting proxies is requested, Miller Financial will provide

recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

---

### **Financial Condition**

Miller Financial does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. We do have discretionary authority over client funds or securities, but we have no financial commitments that would impair our ability to meet contractual and fiduciary commitments to our clients. Neither Miller Financial, nor any of the principals, have been the subject of a bankruptcy petition.

## **Item 19: Requirements for State-Registered Advisers**

---

### **Requirements for State-Registered Advisers**

Refer to the following ADV Part 2B Brochure Supplement for required information on the owners and Principals Ben Newell and Todd Newell.

## **Brochure Supplement**

(Part 2B of Form ADV)



**9115 SW Oleson Rd, Suite 200**

**Portland, OR 97223**

**P: (503) 808-9404**

**F: (503) 808-9223**

**[www.millerfinancial.biz](http://www.millerfinancial.biz)**

**February 9, 2023**

This brochure supplement provides information about Todd K. Newell and Benjamin T. Newell and supplements Miller Financial Group, LLC's Form ADV Part 2A Brochure. You should have received a copy of that Brochure. Please contact us at: (503) 808-9404, or by e-mail at: [todd@millerfinancial.biz](mailto:todd@millerfinancial.biz) or [ben@millerfinancial.biz](mailto:ben@millerfinancial.biz) to request a copy or if you have any questions about the contents of this supplement.

Additional information about Todd K. Newell and Benjamin T. Newell is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

---

**Education and Business Standards**

Miller Financial requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning or work experience that provides a suitable and comparable skillset. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

---

**Ben Newell**

Phone: 503-808-9404 Email: [ben@millerfinancial.biz](mailto:ben@millerfinancial.biz) CRD Number: 5787124

**Item 2: Education and Business Experience**

Personal:

- Year of birth: 1983

Educational Background:

- Oregon State University – 2001-2005 Bachelor of Science - Business Administration

Business Experience

- Edward Jones – Registered Representative – 05/2010 – 12/2011
- Miller Financial Group – 01/2012 – 10/2012
- Miller Financial Group, LLC – 10/2012 - Present

**Item 3: Disciplinary Information**

There are no legal or disciplinary events material to the evaluation of Ben Newell.

**Item 4: Other Business Activities**

Ben Newell is not involved in any other investment related business activity or occupation other than through Miller Financial Group.

**Item 5: Additional Compensation**

Ben Newell does not receive additional compensation or economic benefit from third parties for providing advisory services to clients of Miller Financial Group.

**Item 6: Supervision**

Ben Newell prepares investment policies, forms and procedures for those clients to whom he is primary advisor representative and firm contact. Todd Newell, Chief Compliance Officer, (503) 808-9404, is responsible for supervising the services and advice provided to clients of Miller Financial Group.

**Item 7: Requirements for State-Registered Advisors**

Ben Newell has never been subject to any arbitration claim or any other proceedings (civil, self-regulatory organization or administrative) related to investments, fraud, theft, bribery or dishonest, unfair or unethical practices. He has never been the subject of any bankruptcy petition.

**Todd Newell**

Phone: 503-808-9404 Email: [todd@millerfinancial.biz](mailto:todd@millerfinancial.biz) CRD Number: 1005622

**Item 2: Education and Business Experience**

Personal:

- Year of birth: 1959

Educational Background:

- George Fox University – 1978-1982 Bachelor of Science – Business Administration

Business Experience:

- John Hancock Financial Services – Financial Planner/Sales Mgr. – 07/1981 – 02/1993
- Provident Life & Accident, PHA, Johnson & Higgins – Employee Benefit Rep./Broker – 1992-1996
- George Fox University – Director of Estate and Planned Giving – 1996-2003
- Providence Medical Foundations – Director of Estate and Planned Giving – 07/2003 – 07/2005
- Northwest Christian Community Foundation – Executive Director – 07/2005 – 09/2006
- A Jesus Church Family, Inc. – Operations Pastor – 09/2006 – 05/2015
- Miller Financial Group, LLC – Jun 1, 2015-present

**Item 3: Disciplinary Information**

There are no legal or disciplinary events material to the evaluation of Todd Newell.

**Item 4: Other Business Activities**

Todd Newell is not involved in any other investment related business activity or occupation other than through Miller Financial Group.

**Item 5: Additional Compensation**

Todd does not receive additional compensation or economic benefit from third parties for providing advisory services to clients of Miller Financial Group.

**Item 6: Supervision**

Todd Newell, Chief Compliance Officer, (503) 808-9404, is responsible for supervising the services and advice provided to clients of Miller Financial Group. He prepares investment policies, forms and procedures for those clients to whom he is primary advisor representative and firm contact.

**Item 7: Requirements for State-Registered Advisors**

Todd Newell has never been subject to any arbitration claim or any other proceedings (civil, self-regulatory organization or administrative) related to investments, fraud, theft, bribery or dishonest, unfair or unethical practices, nor has he been . He has never been the subject of any bankruptcy petition.