

Andromed

FORM ADV PART 2A · DISCLOSURE BROCHURE

Andromeda Wealth LLC

Firm Brochure

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This brochure provides information about the qualifications and business practices of Andromeda Wealth LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 305-347-9137. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Andromeda Wealth LLC (CRD #343233) is available on the SEC's website at www.adviserinfo.sec.gov

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.

MATERIAL CHANGES SINCE THE LAST UPDATE

Initial Filing.

FULL BROCHURE AVAILABLE

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

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Advisory Business

Firm Description

Andromeda Wealth LLC ("Andromeda") was founded in 2026. Diego Palm Pimentel is 100% owner.

Types of Advisory Services

ASSET MANAGEMENT

Andromeda offers discretionary and non-discretionary asset management services to advisory Clients. Andromeda will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

DISCRETIONARY

When the Client provides Andromeda discretionary authority the Client will sign a limited trading authorization or equivalent. Andromeda will have the authority to execute transactions in the account without seeking Client approval on each transaction.

NON-DISCRETIONARY

When the Client elects to use Andromeda on a non-discretionary basis, Andromeda will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, Andromeda will obtain prior Client approval on each and every transaction before executing any transaction.

FINANCIAL PLANNING AND CONSULTING

Andromeda offers the following financial planning and consulting services as outlined below:

Full Financial Plan

Financial planning services include a complete evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. Andromeda will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.
- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.

Consultation Services

This service is appropriate for clients who need assistance with individual topics. This is not a detailed financial review and will not provide/result in a complete financial plan. Client may select individual topics above, or other topics as may be deemed appropriate. The individual topics that will be included in this service will be outlined and agreed upon on the financial planning and consulting agreement.

If a conflict of interest exists between the interests of Andromeda and the interests of the Client, the Client is under no obligation to act upon Andromeda's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Andromeda. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written Client consent.

Wrap Fee Programs

Andromeda does not sponsor any wrap fee programs.

Client Assets Under Management

Andromeda has the following Client assets under management:

- Discretionary Amounts: $0
- Non-discretionary Amounts: $0
- Date Calculated: September 4, 2026

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Fees and Compensation

METHOD OF COMPENSATION AND FEE SCHEDULE

ASSET MANAGEMENT

Andromeda offers direct asset management services to advisory Clients. Andromeda charges an annual investment advisory fee based on the total assets under management as follows:

ASSETS UNDER MANAGEMENT	ANNUAL FEE	MONTHLY FEE
$0 to $2,999	$119.88	$9.99

ASSETS UNDER MANAGEMENT	ANNUAL FEE	MONTHLY FEE
$3,000 to $5,999	$155.88	$12.99
$6,000 to $9,999	$191.88	$15.99
$10,000 to $14,999	$227.88	$18.99
$15,000 to $20,000	$299.88	$24.99
Over $20,001	**1.50%**	**0.083%**

Andromeda charges a flat rate fee for accounts with assets under management of up to $20,000, such fee is in excess of the industry norm and similar advisory services may be obtained for less if account value is under $6,396, a flat fee percentage is charged for assets under management of over $20,000. For either option the entire portfolio is charged the same asset management fee. For example, a Client with $10,000 under management would pay $227.88 on an annual basis. For example, a Client with $75,000 under management would pay $1,125.00 on an annual basis. $75,000 x 1.50% = $1,125.00.

The annual fee is 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.). Andromeda considers cash to be an asset class, and as such is included in fee calculations. Also, to be noted, at times fees will exceed the money market yield. Fees are billed monthly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous month. If margin is utilized, the fees will be billed based on the net asset value of the account.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Andromeda with thirty (30) days written notice to Client and by the Client at any time with written notice to Andromeda. If cash and/or securities are deposited into or withdrawn from an existing account mid billing period a prorated fee will be charged for that portion of the account. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Andromeda. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

FINANCIAL PLANNING AND CONSULTING

Andromeda charges either an hourly fee for financial consulting services, or a fixed fee based on complexity and unique Client needs for full financial plans. Prior to the planning process the Client will be provided an estimated plan fee.

HOURLY FEES

Financial Consulting Services are offered based on an hourly fee of $250 per hour.

FIXED FEES

Full Financial Plans are offered based on a flat fee between $500 and $2,000.

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

Financial planning fees are negotiable. Services are completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client at a rate of the fee paid less the value of work already performed, calculated at the Firm's disclosed hourly rate of $250; if no work has been delivered, the client receives a full refund, or any unpaid earned fees will be due to Andromeda. Andromeda reserves the right to waive the fee should the Client implement the plan through Andromeda.

Client Payment of Fees

Fees for asset management services are:

- Deducted from a designated Client account. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed:

- Check – to be remitted by Client to Andromeda
- Electronic Payment via ACH Debit Card, or Credit Card (fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. Andromeda will not have continuous access to the Client's banking information.)

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Margin interest may also apply for Client electing to utilize

margin on their account(s). Andromeda does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Andromeda. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Andromeda does not require any prepayment of fees of more than $500 per Client and six months or more in advance.

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

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

External Compensation for the Sale of Securities to Clients

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

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Performance-Based Fees and Side-by-Side Management

SHARING OF CAPITAL GAINS

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

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

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Types of Clients

DESCRIPTION

Andromeda generally provides investment advice to individuals. Client relationships vary in scope and length of service.

ACCOUNT MINIMUMS

Andromeda requires a minimum of $1,000 to open and maintain an account. In certain instances, the minimum account size may be lowered or waived.

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Methods of Analysis, Investment Strategies and Risk of Loss

METHODS OF ANALYSIS

Security analysis methods may include fundamental analysis, technical analysis, charting, cyclical analysis, and Modern Portfolio Theory. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Modern Portfolio Theory is the theory of finance that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. Modern Portfolio Theory assumes investors are risk averse which means when given two assets with the same expected return the investor will choose the less risky one. An investor is only willing to take more risk if the expected return is greater. Therefore, Modern Portfolio Theory aims to construct a portfolio of investments that has the best possible expected return for the level

of risk. Modern Portfolio Theory relies on historical data and rigid assumptions about market behavior that may fail during market stress. Modern Portfolio Theory treats volatility (variance of returns) as the primary measure of risk rather than actual downside capital loss.

INVESTMENT STRATEGY

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 by providing written notice to Andromeda. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, and option writing (including covered options, uncovered options or spreading strategies).

SECURITY SPECIFIC MATERIAL RISKS

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

- **Market Risk:** The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- **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.
- **Inflation Risk:** When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **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.

- **Management Risk:** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- **Equity Risk:** Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- **Fixed Income Risk:** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- **Investment Companies Risk:** When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, 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 or (ii) 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. Adviser has no control over the risks taken by the underlying funds in which client invests.
- **Cash and Cash Equivalents Risk:** Cash and cash equivalents consist of investments like money market funds, certificates of deposit (CDs), Treasury bills, and short-term government bonds. They are generally considered low-risk compared to other asset classes. While they offer safety, liquidity, and stability, they come with certain risks, such as inflation, interest rate fluctuations, and opportunity costs.
- **Long-term purchases:** Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically the expectation of the investment

is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.

- **Short-term purchases:** Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- **Trading risk:** Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- **Options Trading:** The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. Clients should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and the account will no longer hold the security. When purchasing options there is the risk that the entire premium paid for the option can be lost if the option is not exercised or otherwise sold prior to the option's expiration date. When selling ("writing") options, the risk of loss can be much greater if the options are written uncovered ("naked"). The risk of loss can far exceed the amount of the premium received for an uncovered option and in the case of an uncovered call option the potential loss is unlimited.
- **Trading on Margin:** In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
- **Non-Diversified Fund Risk:** An index fund may become non-diversified if a single underlying stock within the fund exceeds 5% of the fund's total assets. When a single stock's weighting in an index fund's portfolio exceeds 5%, it can increase the portfolio's volatility.
- **Cryptocurrency ETF Risk:** Cryptocurrency ETFs carry several risks, including high volatility, as Cryptocurrency's price can experience significant swings, leading to potential losses. Regulatory uncertainty is another concern, as future government actions could impact the value or legality of these funds. Liquidity and market risks may arise during

periods of extreme market fluctuations, affecting an investor's ability to buy or sell shares at favorable prices. Security risks exist for spot Cryptocurrency ETFs that hold actual Cryptocurrency, as they rely on custodians to safeguard digital assets. Additionally, futures-based Cryptocurrency ETFs may underperform due to contract roll costs and price discrepancies. Given these factors, Cryptocurrency ETFs may not be suitable for all investors, especially those with low risk tolerance or short-term investment goals.

- **Commodity ETF Risk:** Commodity ETFs carry unique risks, primarily driven by price volatility, roll costs in futures contracts, and tax complications. Because these funds track raw materials, their returns are highly susceptible to sudden supply-and-demand shocks, such as geopolitical conflicts or severe weather events

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Item 9

Disciplinary Information

CRIMINAL OR CIVIL ACTIONS

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

ADMINISTRATIVE ENFORCEMENT PROCEEDINGS

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

SELF-REGULATORY ORGANIZATION ENFORCEMENT PROCEEDINGS

Andromeda and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of Andromeda or the integrity of its management.

Item 10

Other Financial Industry Activities and Affiliations

BROKER-DEALER OR REPRESENTATIVE REGISTRATION

Andromeda is not registered as a broker-dealer and no affiliated representatives of Andromeda are registered representatives of a broker-dealer.

FUTURES OR COMMODITY REGISTRATION

Neither Andromeda nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a

commodity trading advisor.

MATERIAL RELATIONSHIPS MAINTAINED BY THIS ADVISORY BUSINESS AND CONFLICTS OF INTEREST

Diego Palm Pimentel is the Owner of logistics and warehouse company 269 Group LLC. He also owns rental property. He spends approximately 60% of his time on these activities. These activities are not a conflict of interest as they do not involve clients.

RECOMMENDATIONS OR SELECTIONS OF OTHER INVESTMENT ADVISORS AND CONFLICTS OF INTEREST

Andromeda does not select or recommend other investment advisors.

Item 11

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

CODE OF ETHICS DESCRIPTION

The affiliated persons (affiliated persons include employees and/or independent contractors) of Andromeda have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Andromeda affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Andromeda. The Code reflects Andromeda and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Andromeda's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Andromeda may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Andromeda's Code is based on the guiding principle that the interests of the Client are our top priority. Andromeda's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete

trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Andromeda will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

INVESTMENT RECOMMENDATIONS INVOLVING A MATERIAL FINANCIAL INTEREST AND CONFLICT OF INTEREST

Andromeda and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

ADVISORY FIRM PURCHASE OF SAME SECURITIES RECOMMENDED TO CLIENTS AND CONFLICTS OF INTEREST

Andromeda and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Andromeda with copies of their brokerage statements.

The Chief Compliance Officer of Andromeda is Diego Palm Pimentel. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

CLIENT SECURITIES RECOMMENDATIONS OR TRADES AND CONCURRENT ADVISORY FIRM SECURITIES TRANSACTIONS AND CONFLICTS OF INTEREST

Andromeda does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Andromeda with copies of their brokerage statements.

The Chief Compliance Officer of Andromeda is Diego Palm Pimentel. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12

Brokerage Practices

FACTORS USED TO SELECT BROKER-DEALERS FOR CLIENT TRANSACTIONS

Andromeda will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Andromeda will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees, reporting ability, execution capability (speed and accuracy), financial stability and reputation, access to markets, technology and reporting platforms, quality of client service and availability of investment research and other brokerage services. Andromeda relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Andromeda. Andromeda does not receive any portion of the trading fees.

Andromeda will recommend the use of Altruist.

RESEARCH AND OTHER SOFT DOLLAR BENEFITS

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Andromeda from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although Andromeda has no formal soft dollar arrangements, Andromeda may receive products, research and/or other services from custodians or broker-dealers connected to client transactions or "soft dollar benefits". As permitted by Section 28(e) of the Securities Exchange Act of 1934, Andromeda receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Andromeda. Andromeda cannot ensure that a particular client will benefit from soft dollars or the client's transactions paid for the soft dollar benefits. Andromeda does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when Andromeda receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that Andromeda has a

fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

BROKERAGE FOR CLIENT REFERRALS

Andromeda does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

DIRECTED BROKERAGE

Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of client transactions as client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices. Not all advisors require their clients to direct brokerage.

AGGREGATING SECURITIES TRANSACTIONS FOR CLIENT ACCOUNTS

Andromeda manages each account separately, and therefore, does not aggregate purchases and sales and other transactions. If orders are not aggregated, some clients purchasing securities around the same time may receive a less favorable price than other clients which may cost clients more money.

Item 13

Review of Accounts

SCHEDULE FOR PERIODIC REVIEW OF CLIENT ACCOUNTS OR FINANCIAL PLANS AND ADVISORY PERSONS INVOLVED

Account reviews are performed quarterly by the Chief Compliance Officer of Andromeda, Diego Palm Pimentel. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, Andromeda suggests updating at least annually.

REVIEW OF CLIENT ACCOUNTS ON NON-PERIODIC BASIS

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

CONTENT OF CLIENT PROVIDED REPORTS AND FREQUENCY

Clients receive written account statements no less than monthly for managed accounts. Account statements are issued by Andromeda's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs. Andromeda does not provide additional reports to Clients.

Item 14 Client Referrals and Other Compensation

ECONOMIC BENEFITS PROVIDED TO THE ADVISORY FIRM FROM EXTERNAL SOURCES AND CONFLICTS OF INTEREST

Andromeda receives additional economic benefits from external sources as described above in Item 12.

ADVISORY FIRM PAYMENTS FOR CLIENT REFERRALS

Andromeda does not compensate for Client referrals.

Item 15 Custody

ACCOUNT STATEMENTS

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by Andromeda.

Andromeda is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Andromeda.

If Andromeda is authorized or permitted to deduct fees directly from the account by the custodian:

- Andromeda will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- Andromeda will obtain written authorization signed by the Client allowing the fees to be deducted; and

- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

Item 16

Investment Discretion

DISCRETIONARY AUTHORITY FOR TRADING

If applicable, Client will authorize Andromeda discretionary authority, via the advisory agreement, 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. If applicable, Client will authorize Andromeda discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. If however, consent for discretion is not given, Andromeda will obtain prior Client approval before executing each transaction.

Andromeda allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Andromeda in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. Andromeda does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17

Voting Client Securities

PROXY VOTES

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

When assistance on voting proxies is requested, Andromeda will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18

Financial Information

BALANCE SHEET

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

FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR ADVISORY FIRM'S ABILITY TO MEET COMMITMENTS TO CLIENTS

Andromeda has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

BANKRUPTCY PETITIONS DURING THE PAST TEN YEARS

Andromeda has not had any bankruptcy petitions in the last ten years.

Item 19

Requirements for State Registered Advisors

PRINCIPAL EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

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

OUTSIDE BUSINESS ACTIVITIES

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

PERFORMANCE BASED FEE DESCRIPTION

Neither Andromeda nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

DISCLOSURE OF MATERIAL FACTS RELATED TO ARBITRATION OR DISCIPLINARY ACTIONS INVOLVING MANAGEMENT PERSONS

The disclosure of material facts related to arbitration or disciplinary actions for all executive officers and management persons can be found in the Part 2B of this Brochure.

MATERIAL RELATIONSHIP MAINTAINED BY THIS ADVISORY BUSINESS OR MANAGEMENT PERSONS WITH ISSUERS OF SECURITIES

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

FORM ADV PART 2B · BROCHURE SUPPLEMENT

Supervised Person Brochure

Diego Palm Pimentel

Item 1 Cover Page

FIRM
Andromeda Wealth LLC

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TELEPHONE
305-347-9137

EMAIL
diego@androwealth.com

WEBSITE
androwealth.com

This brochure supplement provides information about Diego Palm Pimentel and supplements the Andromeda Wealth LLC brochure. You should have received a copy of that brochure. Please contact Diego Palm Pimentel if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Diego Palm Pimentel (CRD #8300279) is available on the SEC's website at www.adviserinfo.sec.gov.

Principal Executive Officer – Diego Palm Pimentel. Year of birth: 1988

Item 2 Educational Background and Business Experience

EDUCATIONAL BACKGROUND

Caribbean International University; Bachelor of Science in Business Administration; 2009

BUSINESS EXPERIENCE

- Andromeda Wealth LLC.; Managing Member/Investment Advisor Representative; 05/2026-Present
- 269 Group LLC; Owner; 04/2019-Present
- Unemployed; 06/2018-04/2019
- Mercantile Commercebank N.A.; Accounts Receivables/Portfolio Manager: 01/2016-06/2018

Item 3

Disciplinary Information

Mr. Palm Pimentel has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

- Was convicted of, or pled guilty or nolo contender ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
- Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
- Was found to have been involved in a violation of an investment-related statute or regulation; or
- Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

Mr. Palm Pimentel never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

- Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
- Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-

related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than $2,500 on him.

Mr. Palm Pimentel has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

- Was found to have caused an investment-related business to lose its authorization to do business; or
- Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than $2,500.

Mr. Palm Pimentel has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 Other Business Activities

Diego Palm Pimentel is the Owner of logistics and warehouse company 269 Group LLC. He also owns rental property. He spends approximately 60% of his time on these activities. These activities are not a conflict of interest as they do not involve clients.

Item 5 Additional Compensation

Mr. Palm Pimentel does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 Supervision

Mr. Palm Pimentel is the Chief Compliance Officer of Andromeda and is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He

will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at diego@androwealth.com or 305-347-9137.

Item 7

Requirements for State-Registered Advisors

Mr. Palm Pimentel has not been involved in any of the following:

An award or otherwise been found liable in an arbitration claim alleging damages in excess of $2,500 involving any of the following:

- An investment or an investment-related business or activity;
- Fraud, false statement(s) or omissions;
- Theft, embezzlement or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion;
- Dishonest, unfair or unethical practices.

An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- An investment or an investment-related business or activity;
- Fraud, false statement(s) or omissions;
- Theft, embezzlement or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion;
- Dishonest, unfair or unethical practices.

Mr. Palm Pimentel has never been the subject of a bankruptcy petition.