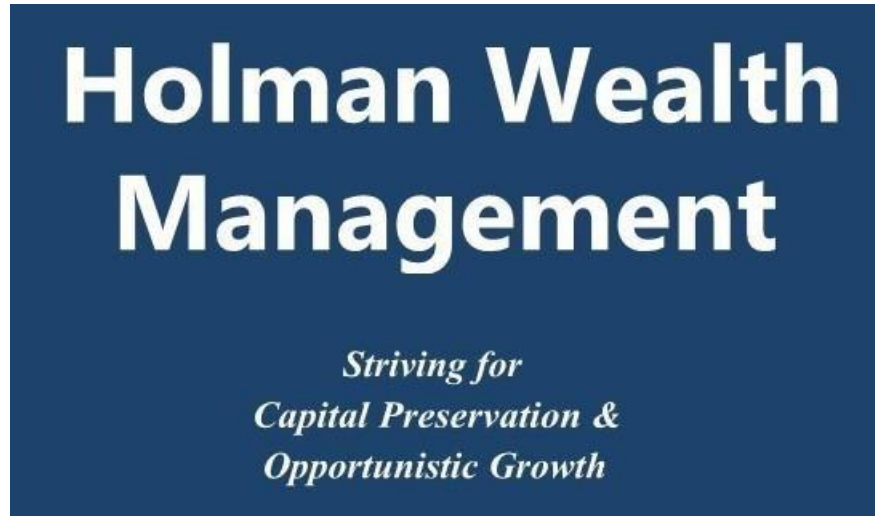


HOLMAN WEALTH MANAGEMENT, LLC



HWM Logo

4035 Shady Hill Drive

Dallas, Texas 75229

469) 907-0628

Form ADV Part 2A – Firm Brochure

March 30, 2026

RobertH@DefensiveAdvisor.com

<http://www.DefensiveAdvisor.com>

This Brochure provides information about the qualifications and business practices of Holman Wealth Management, LLC (“HWM” or “Holman Wealth Management”). If you have any questions about the contents of this Brochure, please contact us at 469) 907-0628. 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.

Holman Wealth Management LLC is registered as an Investment Adviser with the State of Texas. Registration of an Investment Adviser does not imply any level of skill or training. Additional information about HWM is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using the firm’s identification number CRD# 296591.

Item 2: Material Changes

2.A. Current Changes

The last annual update of this Brochure was filed on October 23, 2025. Since then, the following changes have been made:

- Annual update of AUM.
- Updated firm phone number.
- Miscellaneous minor changes to wording or punctuation to improve understanding.

2.B. Future Changes

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 securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually if a material change occurs in the business practices of Holman Wealth Management, LLC.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or for our CRD number (296591).

You may also request a copy of this Disclosure Brochure at any time by contacting us at our general phone number, (469) 907-0628.

Item 3: Table of Contents

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Item 4: Advisory Business

4.A. Description of Advisory Firm

Holman Wealth Management LLC is registered as an Investment Adviser with the State of Texas. HWM was founded in April 2018 and began operations in June 2018. John Robert Holman (“Robert Holman” or “Mr. Holman”) is the principal owner of HWM. As of December 31, 2025, HWM had total discretionary assets under management of \$6,713,278. All assets are managed on a discretionary basis.

4.B. Types of Advisory Services Offered

4.B.1. Investment Management Services (HWM Manages Accounts)

HWM is in the business of managing individually tailored investment portfolios. Our firm provides continuous guidance to clients regarding the investment of client funds based on individual client needs. Through personal collaborative discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We may also review and discuss a client's prior investment history, as well as family composition and background.

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. Fees for this service are outlined in Item 5 of this brochure.

When providing Investment Management Services, HWM will typically construct each client's account holdings using ETFs, mutual funds, VITs, bonds, and equities to build diversified portfolios. While it is not our attempt to time the market, we may pare back exposure to certain asset classes or increase cash in perceived high-risk situations, as deemed appropriate, and we may invest in securities that profit during a market decline.

HWM will be granted discretionary trading authority on the client's account, which enables us to move the client's money between bonds, stocks, ETFs, mutual funds, stocks, and cash, at our discretion.

We may modify our investment strategy to accommodate special situations, such as low-basis stock, stock options, legacy holdings, inheritances, closely held businesses, and special tax situations.

The client is always responsible for notifying us of any changes to their financial situation or investment objectives. We are always reasonably available to consult with our clients about the status of their accounts, situation, and objectives.

4.B.2. Outside Investment Advisory (3rd-Party Managers & Sub-Advisers)

We also offer investment advisory services using third-party money managers (“Outside Managers” and “Sub-Advisers”) for portfolio management services. We assist clients in selecting an appropriate asset allocation model, completing the Outside Manager’s investor profile questionnaire, interacting with the Outside Manager, and reviewing the Outside Manager. Our review process and analysis of Outside Managers are further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the client periodically to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees for this service are outlined in Item 5 of this brochure.

Likewise, we may provide our investment management services as sub-advisors to other investment advisors, wherein HWM is the 3rd-party investment manager. Each arrangement can be somewhat unique because HWM may be asked to sign the agreement drafted by the investment advisor. See 4.B.1 for more information.

4.B.3. XY Investment Solutions (“XYIS”)

XY Investment Solutions (“XYIS”) builds investment model portfolios through a technology-based solution and supports financial planners with investment strategies based on research, experience, and sound rationale. XYIS primarily allocates client assets among various mutual funds and exchange-traded funds (“ETFs”). XYIS may also allocate client assets into individual debt and equity securities, options, and independent investment managers. XYIS's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. XYIS manages client investments on a discretionary basis using model portfolios.

4.B.4. Essential Financial Progression Program (“EFPP”)

Holman Wealth Management no longer offers a limited review of one or more parts of a comprehensive financial plan.

This EFPP service is designed in three parts for beginning investors who want to progress toward an improved lifestyle. The first part of the EFPP consists of an actionable digital financial plan to assist the client with paying off debt and accumulating cash for programmatic investing. The second part of this service involves working one-on-one with a financial planner over an extended period to ensure that the client is achieving the expected improvements and to make modifications to the plan, as necessary. The third part of the EFPP consists of setting up investment accounts and receiving advice from the financial planner on structuring investment portfolios.

The planner educates the client on a wide variety of financial concepts along the way. Ongoing access allows the client to a) ask questions about new situations as they arise; b) update key variables in their plan; c) design new areas of concern into their plan; d)

assess progress versus their plan; and e) make changes to ensure their plan addresses all their concerns and is up to date.

The EFPP is an interactive wealth-enhancement service that ends when the client has reached \$50,000 in investable assets. At that time, the client will graduate to become a regular client of HWM.

4.B.5. Comprehensive Financial Planning

Holman Wealth Management will provide financial planning services to a client who, for whatever reason, wishes not to become an investment management client. For example, this could include a client with assets in an employer or government plan who cannot move the assets to a broker-dealer.

Comprehensive Financial Planning is a comprehensive evaluation of a client's current and future financial state using currently known variables to project future cash flows, asset values, and withdrawal plans, and the feasibility of future financial plans. The key defining aspect of a comprehensive financial plan is that through the financial planning process, all questions, information, and analysis will be considered as they affect, and are affected by, the financial and life situation of the client.

This service involves working one-on-one with a financial planner over an extended period. A client will be taken through establishing their goals and values around money. They will be required to provide information to help us complete our review and assessment, including assets, liabilities, and net worth; annual cash flow; credit scores/reports; insurance coverage; employee benefit plans, retirement, and investment statements; education costs; and tax and estate information.

Clients utilizing this service also pay a monthly or quarterly retainer, for a minimum of 12 months, for which they will receive ongoing access to a planner, allowing them to: a) ask questions about new situations as they arise; b) update key variables in their plan; c) design new features to their plan when required; d) assess ongoing progress versus their plan, and e) recommend any changes to ensure their plan is up to date.

Clients purchasing this service will receive either a written or electronic report providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

Generally, the financial plan may address any or all areas of concern below. 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:

- Organize and Assess Financial Documentation: We will collect, assess, analyze, and organize all client documentation into a notebook for future use and reference.

- **Business Planning:** We provide consultancy services for clients who currently operate their own business, are considering starting a business, or are planning to exit their current business ownership. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a business plan created to achieve your goals.
- **Cash Flow and Debt Management:** We will review your income and expenses to determine your current surplus or deficit. We will advise 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, time to pay off 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 needed to achieve college or other post-secondary education funding goals, with advice on how to save the desired amount. Recommendations for 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 a review and an 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 typically involves a will, powers of attorney, trusts, and/or other related documents. Our advice typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies, such as using applicable trusts or annuities.

Note: We always recommend that our clients consult with a qualified attorney to initiate, update, or complete estate planning activities. When a client wishes to hire an attorney for such purposes, we may provide clients with contact information for an attorney specializing in estate planning. From time to time, we may also participate in meetings or phone calls between clients and their attorneys, with client 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 your goal, and how much you should budget toward your goal.
- **Insurance and annuities:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobiles.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet the client's financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your investment account at a selected broker/dealer or custodian. 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 on the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). As you are near retirement, or if you are already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or to avoid adversely altering spending plans 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 minimizing such risks, the costs of purchasing insurance versus the benefits of doing so, and, likewise, the potential cost of "self-insuring" (i.e., not purchasing insurance).
- **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.

Note: We always recommend that our clients consult a qualified tax professional before initiating any tax planning strategy. We may provide clients with contact information for accountants or attorneys specializing in taxes if they wish to hire someone for such purposes. We will participate in meetings or phone calls between clients and their chosen tax professional, with client approval or request.

The client is ultimately responsible for providing information and communicating changes in circumstances to HWM so that we can provide the most accurate advice and counsel possible. We are always reasonably available to consult with our clients about the status of their accounts, situations, and objectives. The client is ultimately responsible for the implementation of the financial plan recommendations.

4.B.6. Employee Benefit Plan Services

Our firm provides ongoing employee benefit plan services to employer plan sponsors. Generally, such services assist employer plan sponsors in establishing, monitoring, and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include investment options, plan structure, and participant education.

In providing employee benefit plan services, our firm does not provide any advisory services concerning the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities, or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets").

4.B.7. 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 on the needs of the attendees. These seminars are purely educational and do not involve the sale of any investment products. The information presented will not be based on any individual personal needs, nor does HWM provide individualized investment advice to attendees during these seminars.

4.B.8. Client-Tailored Services and Client-Imposed Restrictions

We offer the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client-specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

4.B.9. Wrap Fee Programs

HWM does not participate in wrap-fee programs.

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.

5.A. Investment Management Services – Holman Wealth Management

The HWM standard advisory fee is based on the total market value of the assets under management, and is calculated as follows:

| Account Market Value (previous quarter) | Annual Advisory Fee (paid quarterly) |
|---|--------------------------------------|
| \$0 - \$500,000 | 1.00% |
| \$500,001 - \$5,000,000 | 0.95% |
| \$5,000,001 - \$12,000,000 | 0.90% |
| \$12,000,001 and above | 0.85% |

Annual advisory fees are not negotiable and are pro-rated and paid quarterly in advance. The annual advisory fee is a blended/tiered fee. It is calculated quarterly by first assessing the total market value of all assets in the client's account as of the last day of the previous quarter. Then, as shown in the above chart, we apply the percentage advisory fee to each tier of account value, resulting in a blended/tiered fee. Finally, one-fourth of the annual advisory fee, so calculated, is assessed each quarter.

For example, an account valued at \$2,000,000 would pay an effective annual fee of 0.9625%. The quarterly fee is calculated as follows: $[(\$500,000 \times 1.00\%) + (\$1,500,000 \times 0.95\%)] \div 4 = \$4,812.50$. No increase in the annual fee shall be effective without the client signing a new advisory agreement or an amendment to their current agreement.

While the annual advisory fee is not negotiable, at HWM's sole discretion, an account may pay a lower fee based upon either the length of time with the firm or below-average administrative costs due to lower overall complexity in serving the client, or both.

Brokerage fees and/or transaction ticket fees charged by the custodian will be deducted directly from the client's account. We do not receive any portion of such commissions or fees from the custodian.

Advisory fees are generally directly debited from client accounts, or the client may choose to pay by check. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the unused time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance.

Since fees are paid in advance, upon termination of an account, any unearned fee will be refunded to the client.

5.B. Investment Advisory Services – Outside Manager

The HWM standard advisory fee for an account where HWM recommends the outside advisor or provides overall guidance for the investment program, or typically both, is based on the market value of all asset classes in the account, calculated as follows:

| Account Market Value (previous quarter) | Annual Advisory Fee (paid quarterly) |
|---|--------------------------------------|
| \$100,000 - \$5,000,000 | 0.25% |
| \$5,000,001 - \$12,000,000 | 0.20% |
| \$12,000,001 and above | 0.15% |

Note: The above fee schedule does NOT include the Outside Manager's fee, which varies with the Outside Manager chosen. Outside Manager fees typically range from 1.25% to 0.30% for equity managers, and less for bond managers.

Annual advisory fees are non-negotiable and are prorated and paid quarterly in advance. The Outside Manager will debit the client's account for both the Outside Manager's fee (which is typically discounted substantially to HWM clients) and HWM's advisory fee and will remit HWM's fee to HWM.

No increase in the annual advisory fee shall be effective without the client signing a new advisory agreement or an amendment to their current agreement.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in advance, upon termination of an account, any unearned fee will be refunded to the client.

If XYIS is chosen as the outside manager, the annual fees are negotiable and are prorated and paid in arrears on a quarterly basis and are based on the average daily balance over the previous quarter, as calculated by XY Investment Services.

The above fee is calculated in the same manner as the fee for HWM alone, except that the outside money management firm's fee is included in the calculation.

5.C. Essential Financial Progression Program ("EFPP")

Holman Wealth Management no longer offers a limited review of one or more parts of a comprehensive financial plan.

Clients in the EFPP receive an actionable, digital financial plan for an up-front fee of \$325. This fee covers onboarding; meeting with the financial planner as the data is gathered, exchanged, and incorporated into the plan; and setting the basis for the financial plan. Beginning with the quarter after the financial plan is delivered, a recurring

\$30/month advisory fee commences for ongoing planning, investment advice, and use of tools.

The monthly fee continues as long as the client remains in the EFPP. Either party may terminate this service with 30 days' notice.

As the client accumulates cash available for investing, the client will receive assistance from the planner on establishing investment accounts and advice on how to structure investment portfolios. The \$30 monthly fee covers this advice.

The EFPP is an interactive wealth-enhancement service that ends when the client has reached \$50,000 in investable assets. At that time, the client graduates from the EFPP program to become a regular client of HWM.

5.D. Comprehensive Financial Planning

Comprehensive Financial Plans cover all aspects of a client's financial situation.

An upfront fee of \$500 is collected for client onboarding; meeting with the financial planner as the data is gathered, exchanged, and incorporated into the plan; and setting the basis for the financial plan. A quarterly advisory fee charged on client assets under advisement is assessed in the same manner as the investment management fee on client assets under management described in 5.A.

Fees for this service may be paid by electronic funds transfer or check. Cash payments are not accepted. This service may be terminated by either party with 30 days' notice.

Work on the plan will commence immediately after the fee is paid. After all data is gathered, initial cash flows are available. Once the data gathering is complete and the initial fee is paid, preliminary results will be reviewed with the client. At the meeting, further changes to various activities will be agreed upon and incorporated into the plan. Shortly after the plan is fully complete, a final meeting will be held where a final report is presented.

Clients will receive ongoing access to a planner who will: a) ask questions about and explain new situations as they arise; b) update key variables in their plan; c) design new features into their plan when required; d) assess ongoing progress versus their plan, and e) recommend any changes to ensure their plan is up to date.

5.E. Employee Benefit Plan Services

The annual fee charged to each client will be agreed upon with the client, detailed in the services agreement, and billed quarterly in advance.

Asset-based fees will be based upon the market value of the plan's assets at the end of each prior quarter, not to exceed 1.00% annually. Fees will be based upon either a fixed annual fee or calculated based on the number of employees in the plan's education plan. The fee will be divided into quarterly payments.

All fees are due upon receipt of the client's quarterly billing invoice. Each party may terminate the service agreement at any time with 30 days written notice to the other party. A refund of any unearned fees will be pro-rated based on the remaining time for which the client paid.

5.F. Educational Seminars

Seminars are offered to organizations and the public on various financial topics. Generally, fees range from \$0.00 to \$3,000.00 per seminar, or \$0.00 to \$75.00 per participant, plus travel expenses. One-half of the fees are due before the engagement, and the remaining one-half is to be paid no later than the conclusion of the presentation. The fee is typically based on the content, research conducted, hours of preparation, and the number of attendees.

In the event of inclement weather or a 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.

If the client cancels or changes the event date for any reason other than inclement weather or similar unforeseen causes, the client is responsible for reimbursing the advisor's non-refundable travel and event expenses incurred. In addition, the client will pay 50% of the Speaker's fee if the cancellation occurs within 15 days of the event.

If the Speaker must cancel the event for health or other unforeseen causes, the Speaker shall make all reasonable attempts to find a reasonable alternative engagement date. The Speaker will absorb any 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.

5.G. Speaking Engagements

Mr. Holman is a public speaker. Generally, fees range from \$0.00 to \$500.00 plus travel expenses, depending on the sponsor, date, location, and program requested. One-half of the fees are due before the engagement, and the remaining one-half is to be paid no later than the conclusion of the speech. The fees are typically based on the content, research conducted, hours of preparation, and the number of attendees.

In the event of inclement weather or a 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.

If the Speaker must cancel the event for health reasons or other unforeseen causes, the Speaker shall make all reasonable attempts to find an alternative engagement date. If an alternative date cannot be obtained, the Speaker's fee is waived, and the client is not responsible for reimbursement of any non-refundable travel expenses incurred.

If the client cancels or changes the event date for any reason other than inclement weather or similar unforeseen causes, the client is responsible for reimbursing the advisor's non-refundable travel and event expenses incurred. In addition, the client will pay 50% of the Speaker's fee if the cancellation occurs within 30 days of the event.

Educational Seminars and Speaking Engagements may be provided pro bono at Holman Wealth Management's discretion.

5.H. Other Types of Fees and Expenses

When HWM or an Outside Manager manages your portfolio, our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that are incurred by the client. Clients may incur additional 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 funding fees, and other types of fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall NOT receive any portion of these commissions, fees, and costs.

When HWM provides financial planning services, and the client implements an investment recommendation, the client may incur certain charges such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur additional charges imposed by broker-dealers, 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 funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall NOT receive any portion of these commissions, fees, and costs.

Item 12 below further describes the factors we consider in selecting or recommending broker-dealers for our clients' transactions and in determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees (which are fees paid to an advisor based upon a share of specified capital appreciation in a client's account).

Item 7: Types of Clients

We will provide financial planning and portfolio management services to individuals, high net-worth individuals, pension and profit-sharing plans, participants in such plans, charitable organizations, corporations or other similarly organized businesses, state or municipal government entities, and other investment advisers.

Our required minimum account size is \$50,000 unless a client is enrolled in the Essential Financial Progression Program ("EFPP"), for which there is no minimum.

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

8.A. General Investment Approach

Holman Wealth Management believes that over the long-term, both the economic environment and the financial markets tend to move in a cyclical fashion. HWM believes studying economic and financial indicators can lead to better investment decisions. Studying the analytical tools and indicators below helps HWM manage the degree of risk and reward that come with different asset classes at different cyclical time periods. We generally analyze economic circumstances through a "top-down" approach. Selecting a particular mutual fund, ETF, or sector/index ETF for investment is based on a "cross-referenced" or "bottom-up" technique.

Many things are part of the investment decision-making process, which may be aided or confirmed by factors including opinions of proven and trusted money managers and divergent opinions of opposite-viewpoint money managers. There are also limitations in describing factors that are confidential, proprietary, or somewhat indefinite in nature.

During periods of high risk as determined by HWM, client funds may be held in cash or invested in securities that profit from downward price movements. This approach attempts to protect client assets from deterioration or allows clients to profit from market declines, and the ability to repurchase more securities at lower prices is a reward for such a strategy.

8.B. Investment Analysis

Our primary methods of investment analysis are fundamental, technical, economic, cyclical, charting, and sentiment/psychological/behavioral analysis.

- Fundamental analysis: involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.
- Technical analysis: involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends, and similar periods will presumably occur in the future. Even where major trends develop, outside economic factors could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, technical indicators may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method alone may underperform other trading methods when fundamental factors dominate price moves within a given market.

- Economic analysis: is a type of analysis that involves an examination of changes in interest rates, credit availability, employment, inflation rates, oil prices, industry conditions, government regulations, competition, technological development, political factors, regulatory laws, tax laws, fiscal policy, monetary policy, terms of international trade, threats of international military action, and many other factors. It is difficult to anticipate many of these developments before they occur, and

these factors can severely affect the volatility (radical price swings) and liquidity of some investments. Consequently, account values may be adversely affected, and losses in account value may result.

- Cyclical analysis: is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore, the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.
- Charting analysis: involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.
- Sentiment/Psychological/Behavioral Analysis: trends in the sentiment and behavior of institutional investors, retail investors, and others involved in investment decision-making, as well as in the psychology and behavior of households, businesses, and government entities, can all suggest the causes of underlying economic events and can often indicate areas of increased or decreased economic activity.

HWM may make long-term or short-term purchases and may engage in active trading (holding investments for less than 30 days). HWM may also invest in securities that profit during periods of asset price declines. We may engage in option investing, including selling covered call options, and buying call or put option contracts.

8.C. Third-Party Investment Advisers (“Outside Managers”)

We sometimes refer clients to third-party investment advisers (“Outside Managers”). Our analysis of Outside Managers involves the examination of their experience, expertise, investment philosophies, and past performance of the Outside Managers to determine if that manager has demonstrated an ability to succeed over time and in different economic conditions. We monitor the manager’s underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment.

Additionally, as part of our due diligence process, we survey the manager’s compliance and business enterprise risks. A risk of investing with an Outside Manager who has

been successful in the past is that he/she may not be able to replicate that success in the future. In addition, we do not control the underlying investments in an Outside Manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory, or reputational deficiencies.

8.D. Active Management

HWM employs active methods, strategies, or techniques to construct portfolios intended to generate superior risk/return relationships. NAAIM defines "active investment management services" as taking an active role in the ongoing process of investment selection and risk management, with an objective of improving a portfolio's risk/reward relationship. Note: "beating" is absent from this definition. Active management strategies used by NAAIM members are diverse and utilize a variety of securities.

Active investing involves building portfolios composed of various distinct securities and asset classes, but not all asset classes at all times. HWM typically uses individual securities, and sector or index ETFs, in constructing our portfolios. Individual securities and ETFs are weighed to achieve the desired relationship between correlation, risk, and return. Asset classes are either selected for or eliminated from the portfolio.

Academic research on attempts to beat broad market averages with active management indicates that while many produce results better than market averages in absolute terms, most of that group have underperformed the market over extended periods on a risk-adjusted basis. For this reason, many use the term "risk-on or risk-off" to describe such activity.

8.E. Investment Strategy

HWM prefers to invest in ETFs consisting of US stocks, US bonds, and international stocks, which we believe have the potential for significant price increases. We may also invest in mutual funds or VITs that have proven track records or a specific strategy that we like. We may modify that strategy and buy individual bonds or individual stocks from time to time, but most such holdings are transferred into a client's account and are being maintained for reasons cited in Item 4.

We generally deploy a sector and style rotation investment strategy that attempts to outperform the broad market over full bull-bear-bull-bear-bull market cycles. New accounts may first be invested in a broad stock index ETF (for ex., SPY or IVV), or a bond index ETF (for ex., AGG or BND), or VIT until new sector trends are established. HWM believes that certain sectors tend to outperform or underperform for prolonged periods. We may overweight or limit the portfolio to investments in those sectors that are expected to outperform the broad market.

We recognize that investment styles – growth, value, dividend, balanced, large-cap, mid-cap, small-cap, US-based versus International, and so forth – may also dominate investor behavior for periods of time. HWM tries to take advantage of these profitable trends as they occur and may shift asset allocations correspondingly. We also deploy defensive investment strategies when we assess that market risk is high.

We buy ETFs, mutual funds, bonds, or stocks of sectors expected to provide the most favorable prospects under the six general criteria in Item 8 above. We sell when the ETF, mutual fund, bond, stock, or sector has been a successful holding in the portfolio and future prospects appear to be largely exhausted or have materially deteriorated through some economic event, or when other competing stocks, bonds, mutual funds, ETFs, or sectors have much better expected prospects than the current holding.

8.F. Material Risks Involved

HWM provides active investment management, however, investment recommendations may be made as part of the financial planning service. 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 ETFs, mutual funds, stocks, bonds, options, and any other investment activity or investment security. Material risks associated with our investment strategies are listed below.

1. **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 success of the issuer's operations or its financial condition.
2. **Strategy or Allocation Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.
3. **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-cap and medium-cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.
4. **Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the accounts' performance.
5. **Limited markets:** Certain securities may be less liquid (harder to sell or buy), and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable, or we may be unable to find buyers at any price.
6. **Concentration Risk:** Certain investment strategies focus on select asset classes, industries, sectors, or types of investment. From time to time, these strategies may be

subject to greater risks of adverse developments than a more broadly diversified strategy across a wider variety of investments.

7. 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 true: bond prices generally rise when interest rates fall. Fixed-income securities with longer maturities are more sensitive to interest rate changes. Most other investments are also sensitive to the level and direction of interest rates.

8. Legal, Tax, 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.

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

10. Options Risk: Options on securities generally are subject to greater risks than an investment in the underlying securities. Purchasing calls and puts, and writing call options, are speculative activities that entail greater-than-normal investment risk.

8.G. Risks Associated with Securities

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

1. Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured, the risk to the investor is that the issuer may default.

2. Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring, they could lose all value. A slow growth, or a recessionary economic environment, could adversely affect the price of all common stocks.

3. Corporate Bonds are debt securities issued to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest. They are priced at a discount from their face value, and their values accrete over time to their 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 until a bond's maturity, the greater its interest rate risk.

4. 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.

5. 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. Those risks include: interest rate risk; reinvestment risk; inflation risk; market risk; call or redemption risk; credit risk; and liquidity and valuation risk.

6. Options and other derivatives carry many unique risks, including time sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the hedge selling covered calls. There is a risk that the underlying position may be called away at a price lower than the current market price.

7. Prices of Exchange Traded Funds (or ETFs) may vary significantly from their Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track their underlying benchmarks as expected. 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 delisted 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 ETFs in which the client is invested.

8. Investment Company Risk. When a client invests in open-ended mutual funds, ETFs, or VITs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicates. In addition, the client's overall portfolio may be affected by losses in an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

To professionally manage client accounts, we must fully understand client needs, goals, and concerns. We must fully understand our client's financial situation and be fully apprised of any changes when they occur. As the client's needs, goals, concerns, or financial situations change, the client must communicate the information to HWM quickly, so that the existing strategy for a client's account can be reassessed and modified, as necessary. HWM is readily available to consult with our clients about their account status, financial situation, or objectives.

Item 9: Disciplinary Information

Criminal or Civil Actions

Holman Wealth Management and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Holman Wealth Management and its management have not been involved in any administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Holman Wealth Management 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 HWM or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No HWM employee is registered, or has an application pending to register, as a broker-dealer, a registered representative of a broker-dealer, a futures commission merchant, a commodity pool operator, or a commodity trading advisor.

Holman Wealth Management 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.

Robert Holman is a tax preparer in Taxes Now, the sole proprietorship owned and operated by Mr. Holman, a tax preparation service for individuals and small businesses. All Taxes Now clients are either clients or prospects of HWM and its financial planning and/or investment management services. This activity accounts for approximately 5% of his time. Tax preparation generally does not present any conflicts of interest with HWM activities, because tax preparation is performed after exchange trading is closed.

Mr. Holman is not licensed to sell life and health insurance and receives no compensation for such activities.

Recommendations or Selections of Other Investment Advisers

As referenced in Item 4 of this brochure, HWM may recommend that its clients use Outside Managers to manage their accounts. Should we recommend an Outside

Manager, please note that we do NOT share in their advisory fee, which is typically discounted substantially to HWM clients. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you before engagement. Clients are not obligated, contractually or otherwise, to employ the services of any Outside Manager that we recommend. Additionally, HWM will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

11.A. Fiduciary

We are fiduciaries under the Investment Advisers Act of 1940, Title I of the Employee Retirement Income Security Act (“ERISA”), the Internal Revenue Code (“IRC”), as applicable, regarding your investment and retirement accounts. A fiduciary is someone who must ascertain each client’s best interests in a holistic, collaborative fashion and act accordingly. We must not put our interests ahead of any client’s, and we must not engage in any activity that is opposed to a client’s interests.

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 requires a high standard of conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc.

HWM 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. Additionally, HWM requires adherence to its Insider Trading Policy, the CFA Institute Asset Manager Code of Professional Conduct, and the CFA Institute Code of Ethics and Standards of Professional Conduct.

11.B. 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. These same individuals will place the integrity of the investment profession and the interests of clients ahead of their personal interests.

- **Objectivity** - Associated persons shall be objective in providing professional services to clients. They must exercise independence of thought and objectivity.
- **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. Associates shall engage in annual education and research.
- **Fairness** - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflicts of interest in providing such services. Associates owe the duties of care, loyalty, prudence, and fair dealing to their actions.
- **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 matters shall reflect credit on the profession. Associates must maintain knowledge of the law and must avoid misrepresentation and misconduct.
- **Diligence and Reasonable Care** - Associated persons shall act diligently, with reasonable care, in providing professional services. Any conflicts of interest will be disclosed to clients.

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 a copy of its Code of Ethics to any client or prospective client upon request.

11.C. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates, nor 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 of an underwriter, adviser to the issuer, etc.

11.D. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its "related persons" may buy or sell securities that are the same as, similar to, or different from, those we recommend to clients for their accounts. To reduce or eliminate certain conflicts of interest involving the firm or related-person trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions in trading must be approved in

advance by the firm's compliance department, and we maintain the required personal securities transaction records per regulation.

11.E. 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-MF or non-ETF securities within 5 days before the same security for clients.

Item 12: Brokerage Practices

12.A. Factors Used to Select Custodians and/or Broker-Dealers

Holman Wealth Management does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firms.

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 recommend specific custodians for clients to use – for example, Charles Schwab – 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 custodian, we may be unable to achieve the most favorable execution of client transactions, which may cost more than utilizing a lower-cost custodian.

12.B. The Custodian we use (Nationwide Monument Advisor and its subsidiary, Jefferson National)

As an insurance company, Jefferson National does not fit within the narrow definition of "Qualified Custodian" as set forth in Rule 206(4)-2. In fact, Jefferson National is not a custodian of my clients' Monument Advisor variable annuity accounts (investment portfolios) and does not have access or control over any of my clients' Monument Advisor variable annuity investment portfolios. Jefferson National serves as the insurance company selling the Monument Advisor variable annuity and the recordkeeper of related policy information.

Jefferson National delivers periodic account statements (at least quarterly) to each person who is a Monument Advisor account holder. The account statements are sent to the client's address of record or delivered electronically as requested by the client. The account statement identifies the amount of assets held in each investment portfolio of the Monument Advisor variable annuity at the end of each period and documents transactions in the account during the period. Regulators occasionally request confirmation of positions and values of clients' Monument Advisor variable annuity investment portfolios, and Jefferson National responds to such confirmation requests.

12.C. Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, in particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Outside Managers used by HWM may aggregate block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13: Review of Accounts

Robert Holman, principal Owner and CCO of HWM, will work with financial planning clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. HWM does not provide specific reports to these clients, other than financial plans.

Client accounts with the Investment Management Service will be reviewed regularly (at least on a quarterly basis) by Robert Holman, principal Owner and CCO of HWM. The account is reviewed against the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletion of client-imposed restrictions, excessive drawdown, volatility in performance, or buy and sell decisions from the firm or per the client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts, 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, and purchase and sale of securities.

HWM will not provide written reports to Investment Management clients. Clients can use the Capitect.com client portal to see additional information regarding their accounts. HWM urges clients to review the current account statements they receive.

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.

HWM may, from time to time, engage an independent, unaffiliated person or business to refer potential clients to the Advisor (HWM). HWM will compensate the unaffiliated business according to their payment terms, generally, either: a) when an individual is referred to HWM; or b) when a referred individual becomes a client of HWM. The Advisor does not charge referred clients any fees or costs higher than its standard fee schedule offered to its clients obtained from other sources.

As disclosed under Item 12 above, HWM participates in Charles Schwab's institutional customer program, and HWM may recommend Charles Schwab to clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its clients, although Advisor receives economic benefits through its participation in the program that are typically not available to Charles Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research-related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third-party vendors. Charles Schwab may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by Charles Schwab through the program may benefit Advisor but may not benefit its client accounts. These products or services may assist Advisor in managing and administering client accounts, including accounts not maintained at Charles Schwab. Other services made available by Charles Schwab are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not

depend on the amount of brokerage transactions directed to Charles Schwab. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Charles Schwab for custody and brokerage services.

Item 15: Custody

HWM does not accept custody of client funds. We do not accept checks from clients to be deposited into client accounts, and we do not accept checks drawn on client accounts to be held at HWM for pickup.

For client accounts in which HWM directly debits their advisory fee:

- i. HWM 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 HWM, 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 the client's investment assets. We urge clients to carefully review such statements and compare the official custodial records to the account statements or reports provided to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion and Client Funds

For those client accounts where HWM provides investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced.

At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion to trade the account and to discuss securities transactions held in the account. However, with a Limited Power of Attorney, HWM does not have the ability to add funds to, or withdraw funds from, a client account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

- 09/2014 – 04/2018, LPL Financial, Wealth Manager (independent contractor)
- 09/2008 – 08/2014, TD Ameritrade, Investment Consultant (employee)

19.B. Professional Designations, Licensing & Exams

1. 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 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. More than 230,000 individuals have obtained the CFP® mark around the world.

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

- Education – a) 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 b) 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 the 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 to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education every two years, including two hours on the Code of Ethics and other parts of the CFP

Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew and agree to be bound by the CFP 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 the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

2. Chartered Financial Analyst (CFA or CFA®): The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. It is designed to prepare charter holders for a wide range of investment specialties applicable in every market all over the world. To earn a CFA charter, all individuals study for three exams (Levels I, II, III) using an assigned curriculum. Upon passing each exam and meeting the professional and ethical requirements, the individual is awarded a charter.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by the CFA Institute, the largest global association of investment professionals.

There are currently more than 100,000 CFA charter holders working in the United States. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

❖ High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, requires CFA charter holders to:

- Place their client's interests ahead of their own;
- Maintain independence and objectivity;
- Act with integrity;
- Maintain and improve their professional competence; and
- Disclose conflicts of interest and legal matters

❖ Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the

CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision-making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders, often making the charter a prerequisite for employment.

Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

❖ Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision-making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test the candidate's proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

CFA® charter holders who fail to comply with the above ethics, professional standards, and other requirements may be subject to the CFA Institute's enforcement process, which could result in censure or permanent revocation of their CFA® charter.

19.C. Other Business Activities

Robert Holman is a tax preparer in Taxes Now, a sole proprietorship owned by Mr. Holman, a tax preparation service for individuals and small businesses. This activity accounts for approximately 5% of his time.

19.D. Performance-Based Fees

HWM is not compensated by performance-based fees. Please refer to Item 6 of this brochure.

19.E. Material Disciplinary Disclosures

No management person at Holman Wealth Management 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.

19.F. Material Relationships that Management Persons have with Issuers of Securities

Neither Holman Wealth Management, LLC, nor Robert Holman, have any relationship or arrangement with issuers of securities.

19.G. Additional Compensation

Robert Holman does not receive any economic benefit from any person, company, or organization in exchange for providing clients' advisory services through HWM.

19.H. Supervision

Robert Holman, Owner and Chief Compliance Officer of HWM, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

19.I. Requirements for State Registered Advisers

Robert Holman has NOT been involved in: an arbitration; civil proceeding; self-regulatory proceeding; administrative proceeding; or bankruptcy petition.

HOLMAN WEALTH MANAGEMENT, LLC

4035 Shady Hill Drive

Dallas, Texas 75229

469) 907-0628

March 30, 2026

Form ADV Part 2B – Brochure Supplement

For

**John Robert Holman - CRD# 5592274 Founder, Owner and
CCO (Chief Compliance Officer)**

This brochure supplement provides information about Robert Holman that supplements the Holman Wealth Management, LLC (“HWM” or “Holman Wealth Management”) firm brochure. A copy of that brochure precedes this supplement. Please contact Robert Holman if the HWM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Robert Holman is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using the identification number CRD# 5592274.

Item 2: Educational Background and Business Experience

John Robert Holman

Born: 1951

Educational Background

- 1978, BBA – Finance, summa cum laude, University of Texas at Austin

Business Experience

- 04/2018 – Present, Holman Wealth Management, LLC, Founder, Owner and CCO
- 08/2014 – 04/2018, LPL Financial, Wealth Manager
- 09/2008 – 08/2014, TD Ameritrade, Investment Consultant

Professional Designations, Licensing & Exams

- Chartered Financial Analyst (CFA or CFA®)
- Certified Financial Planner™ (CFP®)
- Series 63 Securities License (Uniform Securities Agent State License)
- Series 66 Securities License (Uniform Combined State Law License)
- Series 7 Registered Representative (General Securities Registered Representative License) from 2008 to 2018

1. Certified Financial Planner (CFP®): 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 the 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 many 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 230,000 individuals have obtained CFP® certification around the world.

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 the 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 the 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 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 a client’s best interest.

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

To learn more about the CFP certificate, visit <https://www.cfp.net/>.

2. Chartered Financial Analyst (CFA and/or CFA®): The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. It is designed to prepare charter holders for a wide range of investment specialties that apply in every market all over the world. To earn a CFA charter, applicants study for three six-hour cumulative exams (Levels I, II, III) using an assigned curriculum. Upon passing all three exams and meeting the professional and ethical requirements, they are awarded a charter.

The CFA charter is a globally respected, graduate-level investment credential established in 1962 and awarded by the CFA Institute, the largest global association of investment professionals. There are currently more than 100,000 CFA charter holders working in the United States.

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

❖ High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, requires CFA charter holders to:

- Place their clients' interests ahead of their own;
- Maintain independence and objectivity;
- Act with integrity;
- Maintain and improve their professional competence; and
- Disclose conflicts of interest and legal matters.

❖ Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision-making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders, often making the charter a prerequisite for employment.

Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

❖ Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision-making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test the candidate's proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools,

ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3: Disciplinary Information

No management person at Holman Wealth Management has ever been involved in an arbitration claim of any kind. No management person at Holman Wealth Management has ever been the subject of, or found liable in, a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Robert Holman is a tax preparer for Taxes Now, the sole proprietorship owned and operated by Mr. Holman. This activity accounts for approximately 5% of his time.

Item 5: Additional Compensation

Robert Holman does not receive any economic benefit from any person, company, or organization in exchange for providing clients' advisory services through HWM.

Item 6: Supervision

Robert Holman, as Owner and Chief Compliance Officer of HWM, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Robert Holman has not been involved in any arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.