

# **Stapp Wealth Management, PLLC**

1800 Cooper Pt Rd SW #10, Olympia, WA 98502  
PO Box 11567, Olympia, WA 98508-1567

Telephone: 360-754-8895

Facsimile: 360-754-8896

Website: [www.stappfinancial.com](http://www.stappfinancial.com)

September 18, 2023

## **FORM ADV PART 2A BROCHURE**

This Brochure provides information about the qualifications and business practices of Stapp Wealth Management, PLLC. If you have any questions about the contents of this Brochure, please contact us at (360)754-8895 or [gstapp@stappfinancial.com](mailto:gstapp@stappfinancial.com). 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 Stapp Wealth Management, PLLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Stapp Wealth Management, PLLC is 116553.

Stapp Wealth Management, PLLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level or skill or training.

Questions or concerns about the contents, information on our services, fees, or other business activity, or backgrounds of our advisors, should be directed to Rebecca Stapp, Chief Compliance Officer at (360)754-8895 or email at [bstapp@stappfinancial.com](mailto:bstapp@stappfinancial.com).

## **Item 2 – Material Changes**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated September 18, 2023 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Rebecca Stapp/Assistant at (360)754-8895 or [bstapp@stappfinancial.com](mailto:bstapp@stappfinancial.com).

Additional information about Stapp Wealth Management, PLLC is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with Stapp Wealth Management, PLLC who are registered, or are required to be registered, as investment adviser representatives of Stapp Wealth Management, PLLC.

### Item 3 -Table of Contents

Item 1 – Cover Page.....	<b>Error! Bookmark not defined.</b>
Item 2 – Material Changes.....	ii
Item 3 -Table of Contents.....	iii
Item 4 – Advisory Business .....	1
Item 5 – Fees and Compensation .....	4
Item 6 – Performance-Based Fees and Side-By-Side Management .....	6
Item 7 – Types of Clients .....	6
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9 – Disciplinary Information .....	10
Item 10 – Other Financial Industry Activities and Affiliations .....	10
Item 11 – Code of Ethics.....	10
Item 12 – Brokerage Practices .....	12
Item 13 – Review of Accounts .....	13
Item 14 – Client Referrals and Other Compensation.....	13
Item 15 – Custody .....	14
Item 16 – Investment Discretion.....	14
Item 17 – Voting Client Securities.....	15
Item 18 – Financial Information.....	15
Item 19 – Requirements for State-Registered Advisers.....	15
Item 20 - Additional Information .....	10

## **Item 4 – Advisory Business**

Stapp Wealth Management, PLLC is a registered investment adviser based in Olympia, Washington. We are organized as a professional limited liability company under the laws of the State of Washington. We have been providing investment advisory services since 1996.

Currently, we offer the following investment advisor services, which are tailored to each individual client:

- Portfolio Management Services
- Financial Planning Services
- Tax Preparation

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we personalize our advisory service to your individual needs. As used in this Brochure, the words “we”, “our”, and “us” refer to Stapp Wealth Management, PLLC and the words “you”, “your” and “client” refer to you as either the client or prospective client of our firm.

### **Portfolio Management Services**

If you engage us for this service, we will ask you to provide information concerning your personal and financial situation, investment objectives, tolerance or risk, and your investment time horizon. We will also request that you inform us of any reasonable restrictions you wish to impose on the management of your account. We will provide continuous advice to you regarding the investment of your funds based on your individual needs. Through personal discussions in which your goals, objectives and particular circumstances are established, we will create and manage a portfolio.

In general, investment clients will be invested in one of five portfolio strategies in which Stapp Wealth Management, PLLC manages with discretionary authority. These portfolio strategies are designed based on varying degrees of risk. The portfolios range in risk level from defensive to aggressive. We will create a portfolio consisting primarily of no-load and exchange-traded funds (“ETFs”). We will allocate your assets among various investments taking into consideration the overall portfolio style selected by you. The mutual funds will be selected on the basis of any or all of the following criteria: the fund’s performance history, the industry sector in which the fund invests, the track record of the fund’s manager, the fund’s investment objectives, the fund’s management style and philosophy, and the fund’s management fee structure. Portfolio weighting between funds and market sectors will be determined by your individual needs and circumstances. You will have the

opportunity to place reasonable restrictions on the types of investments which will be made on your behalf. You will retain individual ownership of all securities. The selection of a specific model can only be changed in writing.

You may terminate the portfolio management agreement by providing written notice to our firm.

### **Financial Planning Services**

We offer broad-based, modular, and consultative financial planning services for clients that meet the minimum account balance and have signed an Investment Management Agreement. Please refer to *Types of Clients*. Financial planning will typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. We will meet with you to gather information about your financial circumstances and objectives. Once we review and analyze the information you provide to our firm, we may deliver an electronic plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to our firm. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations.

We charge an hourly fee for financial planning services for the US Military referrals, which is negotiable. A fee invoice will be provided upon delivery of the plan and the payment requirement by check. The invoice will indicate the hours worked and hourly rate charged. The check will be made payable to Stapp Wealth Management, PLLC.

### **Tax Preparation**

We offer individual tax preparation services to you if you meet the minimum account balance and you have signed an Investment Management Agreement. Please refer to *Types of Clients*. Clients with a simple tax return will receive a \$550 maximum annual credit for tax preparation. A simple tax return has the following:

- W-2 Income
- Interest and dividend income
- Unemployment income
- Form 1099-R
- Social Security Forms
- Standard deductions

We will also prepare more complicated individual tax returns for a fee. We will give you an estimate of the total time/cost will be determined at the start of the relationship. In limited circumstances, the cost/time could be potentially exceed the initial estimate. We will notify you if the fee has exceeded the estimate.

Tax Preparation is based on information provided to our firm. You must promptly notify our firm if you receive correspondence from the Internal Revenue Service.

Tax planning recommendations are based on your individual situation and the financial information you provide to our firm.

### **Types of Investments**

We primarily recommend Mutual Funds and Exchange Traded Funds; however, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on a type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

### **IRA Rollover Recommendations**

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE2020-02") where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries with the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interest , so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this rule provision, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice)
- Never put our financial interests ahead of yours when making recommendations (give loyal advice)

- Avoid misleading statements about conflicts of interest, fees, and investments
- Follow policies and procedures designed to ensure that we give advice that is in your best interest
- Charge no more than is reasonable for our services
- Give you basic information about conflicts of interest

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fee. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

### **Assets Under Management**

Stapp Wealth Management, PLLC provided continuous management services for \$104,711,061 in client assets at Charles Schwab & Co., Inc. as of September 18, 2023.

Stapp Wealth Management, PLLC has discretion/Limited Power of Attorney over the assets managed. Stapp Wealth Management, PLLC does not manage any client's assets on a non-discretionary basis.

### **Item 5 – Fees and Compensation**

Basic fee schedule: Hourly fee based on number of hours to develop a financial plan.

The Financial Planning hourly rate is \$250.00 which is not negotiable with the exception of US Military referrals. The hourly rate for US Military referrals is \$150.00.

A fee invoice will be provided to the client upon delivery of the plan and the payment requirement by check. The invoice will indicate the hours worked and hourly rate charged. The check will be made payable to Stapp Wealth Management, PLLC.

Provide supervisory or managing investment advisory services. The specific manner in which fees are charged by Stapp Wealth Management, PLLC is established in a client's written agreement "Stapp Wealth Management, PLLC Investment Management Agreement."

These supervisory or management investment advisory services are based on a percentage of assets managed through Charles Schwab & Co., Inc. Services.

Annual billing computes to a percentage of assets under management as follows:

The first	\$1-\$100,000	1%
The next	\$100,001-\$500,000	.75%
The next	\$500,001-\$1,000,000	.50
The next	\$1,000,001 and greater	.20%

(Fees may be waived or reduced for family and employees).

Clients under prior agreements may be charged management fee rates that are less than the current investment management agreement rates.

Stapp Wealth Management will send a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and if applicable, the amount of assets under management on which the fee was based. Stapp Wealth will include the name of the custodian (Charles Schwab & Co., Inc.) on our fee invoice. We will send these to the client concurrent with the request for payment or payment of the Advisor's advisory fees. We urge the client to compare this information with the fees listed in the account statements at Schwab.

Compensation payment schedule:

Managed asset accounts billings based on assets billed quarterly after the end of each calendar quarter.

Clients management fees will be directly debited from client accounts at Schwab. Client must authorize Stapp Wealth Management, PLLC to directly debit fees from client accounts.

Clients will receive an informational copy of the billing.

Management fee shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals).

Refund/contract termination: Pro-rata charge made for bona-fide advisor services actually rendered.

Fees are not negotiable.

Stapp Wealth Management, PLLC shall not receive brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by Charles Schwab & Co., Inc. such as fees charged by managers, custodial fees, deferred sales charges, 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.

Item 12 further describes the factors that Stapp Wealth Management, PLLC considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation.



Stapp Wealth Management, PLLC prepares the Corporation, Estate, Individual, Partnership and Trust tax returns for clients with combined assets under management exceeding \$250,000.

Clients will receive a \$550.00 maximum annual credit on tax preparation on a Form 1040, US Individual Tax Return. If a client's tax preparation exceeds the maximum credit, a statement indicating the tax preparation fee will be provided to the client upon completion of the tax return. The payment of the tax preparation will be by check. The check will be made payable to Stapp Wealth Management, PLLC.

Stapp Wealth Management, PLLC clients may receive tax planning recommendations based on their individual investment situation.

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

We do not accept performance-based fees or participate in side-by-side management. Side-by-Side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the Advisor Business section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

### **Item 7 – Types of Clients**

Stapp Wealth Management, PLLC provides portfolio management services to individuals, high net worth individuals, and retirement accounts.

Generally, you must maintain a minimum account of combined assets of \$250,000, subject to negotiation or waiver by our firm. We may waive the minimum or require a higher or lower minimum, in our sole discretion. If the aggregated value of your accounts falls below the minimum, we have the right to require deposit of additional amounts to bring your account up to require minimum, send your account to Charles Schwab & Co., Inc. Retail or close and liquidate your account and send the proceeds to you in accordance with your written delivery instructions.

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

### **Our Methods of Analysis**

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

We may use performance analyses, research reports, market data, or other information or services from third parties to assist in selecting investments for you and in developing and maintaining the Models or Account portfolios.

In particular, we may rely on third-party charting services, or third-party services that provide technical or cyclical analyses, in managing your account and identifying market sectors or asset classes.

Investments may be selected on the basis of any or all of the following criteria: performance history, the industry sector in which the security invests, the track record of any investment manager, the security's objectives, management style and philosophy, fee structure, trading restrictions, and the ability of the Adviser and the Custodian to execute orders and maintain records in an efficient manner, at reasonable costs.

The strategies to be used to achieve your objectives may include, among others, long-term purchases, short-term purchases and trading (securities sold within 30 days).

We may use model portfolios (each "Model") that our firm (or a third party) constructs and adjusts from time to time to achieve specific investment objectives. During the initial discussion with you, if we determine it is appropriate, we will recommend and assist you select a suitable Model; however, you will have sole authority to select the Model for the Account. Models we may use are described below:

- 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.
- Technical Analysis – involves studying past price patterns and trends in the financial markets to predict the direction of both overall market and specific stocks.
- Cyclical Analysis – a type of technical analysis that involves evaluating recurring price patterns and trends.
- Long Term Purchases – securities purchased with the exception that the value of those securities will grow over a relatively long period of times, generally greater than one year.

- Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities short-term price fluctuations.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitable factors. Your restrictions and guidelines may affect the composition of your portfolio.

Charting and Technical Analysis – The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known 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.

Cyclical Analysis – Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The length of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in prediction economic trends and consequently the changing value of securities that would be affected by these changing trends.

We may use short-term trading (in general, selling securities within 30 days of purchasing the same securities) as an investment strategy when managing your account(s). Short-term trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and tolerance for risk.

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First-in First-Out) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about the cost basis

accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

## **Risk of Loss**

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops and bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

## **Recommendation of Particular Types of Securities**

As disclosed under the “Advisory Business” section in this Brochure, we primarily recommend Mutual Funds and Exchange Traded Funds however may recommend any type investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

**Mutual Funds and Exchange Traded Funds:** Mutual funds and Exchange Traded Funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund’s investments in accordance with the fund’s investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. During times of extreme market volatility ETF pricing may lag versus the actual net underlying asset values. This lag usually resolves itself in a short period of time (usually less than one day) however there is no guarantee this relationship will always occur. The return on mutual funds and ETFs can be reduced by the cost to manage the funds. Also, while some mutual funds are “no load” and charge no fee to buy into, or sell out of the fund, other types of mutual do charge such fees which can also reduce returns. Mutual funds can also be “closed end” or “open end”. So-called “open end” mutual funds continue to allow in new investors indefinitely which can dilute other investors’ interests.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Stapp Wealth Management, PLLC or the integrity of Stapp Wealth Management, PLLC's management. Stapp Wealth Management, PLLC has no information applicable to this Item.

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

Stapp Wealth Management, PLLC prepares the Corporation, Estate, Individual, Partnership and Trust tax returns for clients with combined assets under management exceeding \$250,000.

## **Item 11 – Code of Ethics**

Stapp Wealth Management, PLLC has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Stapp Wealth Management, PLLC must acknowledge the terms of the Code of Ethics annually, or as amended.

Stapp Wealth Management, PLLC anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Stapp Wealth Management, PLLC has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Stapp Wealth Management, PLLC its affiliates and/or clients, directly or indirectly, have a position of interest. Stapp Wealth Management, PLLC's employees and persons associated with Stapp Wealth Management, PLLC are required to follow Stapp Wealth Management, PLLC's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Stapp Wealth Management, PLLC and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Stapp Wealth Management, PLLC's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Stapp Wealth Management, PLLC will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing

employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Stapp Wealth Management, PLLC's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Stapp Wealth Management, PLLC and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Stapp Wealth Management, PLLC's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. Stapp Wealth Management, PLLC will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Stapp Wealth Management, PLLC's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Gregory Stapp.

It is Stapp Wealth Management, PLLC's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Stapp Wealth Management, PLLC will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

## **Item 12 – Brokerage Practices**

Stapp Wealth Management, PLLC recommends that investment clients establish a brokerage account(s) with Charles Schwab & Co., Inc., a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to affect trades in their account(s).

Stapp Wealth Management, PLLC is independently owned and operated and not affiliated with Charles Schwab & Co., Inc.

Stapp Wealth Management, PLLC shall have discretion/Limited Power of Attorney on a client's account(s). All investment decisions will be executed by Stapp Wealth Management, PLLC in accordance with their Investment Policy Statement. Clients will sign a Stapp Wealth Management, PLLC Investment Management Agreement, their Investment Policy Statement and Charles Schwab & Co., Inc. account(s) application.

All signed and initialed Charles Schwab & Co., Inc. applications grant Stapp Wealth Management, PLLC Limited Power of Attorney to execute trades on behalf of the client(s).

Charles Schwab & Co., Inc. provides Stapp Wealth Management, PLLC with access to its institutional trading and custody services, which are not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. Schwab's services include brokerage, custody, research, and access to mutual funds and other investments.

Charles Schwab & Co., Inc. does not charge separately for accounts maintained in our custody at Stapp Wealth Management, PLLC. Charles Schwab & Co., Inc. is compensated by account holders through commissions or other trade-related fees for security trades that are executed through Charles Schwab & Co., Inc. or that settle into Charles Schwab & Co., Inc. accounts.

Charles Schwab & Co., Inc. makes available to Stapp Wealth Management, PLLC other products and services that benefit Stapp Wealth Management, PLLC but may not benefit our clients' account(s). These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution and allocation of aggregated trade orders for multiple clients' accounts; provide research, pricing information and other market data; facilitate payments of Stapp Wealth Management, PLLC management fees from clients' accounts; and assist with back-office functions, record keeping and client reporting.

Stapp Wealth Management, PLLC's recommendation that clients maintain their assets in accounts at Charles Schwab & Co., Inc. is based in part of the benefit to Stapp Wealth

Management, PLLC of the availability of some of the foregoing products and services provided by Charles Schwab & Co., Inc.

Stapp Wealth Management, PLLC can use a wide range of investment products but primarily uses no-load mutual funds and exchange-traded funds in portfolios under management. Purchases and sales of positions are based on but not limited to factors such as changes in economic conditions, changes in market conditions, changes in return expectations, changes in risk expectations, overall tax implications and changes, and changes in management. Recommendations are implemented in client and employee accounts at Schwab.

### **Item 13 – Review of Accounts**

Stapp Wealth Management, PLLC offer to meet with clients on an annual basis. The level and frequency of review varies by client. Accounts are reviewed for consistency with the investment strategy and performance among other things. Reviews may be triggered by changes in an account holder's personal, tax or financial status. There is currently no limit placed on the number of accounts that can be review by Stapp Wealth Management, PLLC.

Comprehensive personal financial plans are reviewed upon request.

A triggering event, such as a dramatic market move (in either direction), or retirement, will prompt a review of client accounts to ascertain if needed to make appropriate repositioning moves.

Stapp Wealth Management, PLLC prepares regular quarterly client reports that will be posted in each client Investment Performance Portal. Charles Schwab & Co., Inc. will provide account statements, transaction confirmations, all applicable tax documents, required minimum distributions from qualified plans, as well as; proxy documents, including ballots and any communications from public companies.

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

Stapp Wealth Management, PLLC does not have any arrangements, oral or in writing, where it is paid cash or receives economic benefit (including commissions, equipment, or non-research services) from a non-client in connection with giving advice to clients. In addition, the firm does not directly or indirectly compensate any person for client referrals.



## **Item 15 – Custody**

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct the acting custodian Charles Schwab & Co., Inc. to deduct our advisory fees directly from your account. The acting custodian maintains actual custody of your assets. You will receive account statements directly from the acting custodian monthly. They will be sent to the email or postal mailing address you provided the acting custodian. You should carefully review these statements promptly when you receive them. Stapp Wealth Management, PLLC urges you to carefully review such statements and compare such official custodial records to the quarterly account reports that we may provide to you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

Stapp Wealth Management, PLLC receives written discretionary authority from the client at the outset of an advisory relationship. Stapp Wealth Management, PLLC has the discretion to buy, sell, exchange or otherwise trade in securities that are approved by Stapp Wealth Management, PLLC and to execute orders for such securities through Charles Schwab & Co., Inc.

Client may impose reasonable restrictions on their account, including, but not limited to, the type, nature, or specific names of securities to be bought, sold, or held in their account. If not specifically requested by the client, discretionary authority will be established at the time the account is opened.

Investment guidelines and restrictions must be provided to Stapp Wealth Management, PLLC in writing.

When selecting securities and determining amounts, Stapp Wealth Management, PLLC observes the investment policy statement. For registered investment companies, Stapp Wealth Management, PLLC's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Stapp Wealth Management, PLLC shall have discretion/Limited Power of Attorney on a client's account(s). All investment decisions will be executed by Stapp Wealth Management, PLLC in accordance with their Investment Policy Statement. Clients will sign

a Stapp Wealth Management, PLLC Investment Management Agreement, their Investment Policy Statement and Charles Schwab & Co., Inc. account(s) application.

All signed and initialed Charles Schwab & Co., Inc. applications grant Stapp Wealth Management, PLLC Limited Power of Attorney to execute trades on behalf of the client(s).

#### **Item 17 – Voting *Client* Securities**

As a matter of firm policy and practice, Stapp Wealth Management, PLLC does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Stapp Wealth Management, PLLC may provide advice to clients regarding the clients' voting of proxies.

#### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Stapp Wealth Management, PLLC's financial condition. Stapp Wealth Management, PLLC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

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

We are federally registered investment adviser; therefore, we are not required to respond to this item.

#### **Item 20 – Additional Information**

##### **Your Privacy**

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public information about you to employees who need that information in order to provide services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public information and to ensure our integrity and confidentiality. We will not sell information about you or your account to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy policy prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. It will be sent to the postal mailing address you provided to Charles Schwab & Co., Inc. or we will upload it to your Investment Performance Portal based on your delivery preference. The Privacy Policy is also available on our website at [www.stappfinancial.com/privacy-policy](http://www.stappfinancial.com/privacy-policy). Please contact our office at the telephone number on the cover page of this Brochure if you have any questions regarding this policy.

### **Trade Errors**

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective accounts may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, the trade error will be corrected in the trade error account of the executing broker-dealer and you will not keep the profit.

### **Class Action Lawsuits**

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

## **Gregory T. Stapp**

Gregory T. Stapp began his career with a CPA firm in 1985. He became a licensed Certified Public Accountant in 1986 and later advanced to a shareholder position within the firm. He became a CERTIFIED FINANCIAL PLANNER™ professional in 1990, a Personal Financial Specialist in 1996, and has served on the Washington Society of Certified Public Accountant's Personal Financial Planning Committee. In December of 1996 he formed his own accounting and financial planning firm. He was accepted as a member of the National Association of Personal Financial Advisors (NAPFA) in August of 1997. NAPFA is an association of fee-only financial advisors located throughout the United States. He formed Stapp Wealth Management, PLLC in November of 1998.

Gregory T. Stapp's education includes:

College for Financial Planning, Denver, Colorado  
Degree: Master of Science Degree in Financial Planning – 2000

College for Financial Planning, Denver, Colorado  
Degree: Certified Financial Planner – 1990

Whitworth College, Spokane, Washington  
Degree: Bachelor of Arts – Accounting – 1984

Passed Industry Exams Include:

Series 63	November 26, 1991
Series 65	December 9, 1996

Disciplinary Information

None

**Thomas M. Stapp**

He became a CERTIFIED FINANCIAL PLANNER™ professional in 2020. He was accepted as a member of the National Association of Personal Financial Advisors (NAPFA) in 2020. NAPFA is an association of fee-only financial advisors located throughout the United States.

Thomas M. Stapp's education includes:

Baylor University  
Degree: BBA Financial Services and Planning

Disciplinary Information:

None

Other Business Activities:

None

**Rebecca A. Stapp**

Rebecca A. Stapp's education includes:

Saint Martin's College, Olympia

Certification: Education

Pacific Lutheran University, Tacoma

Degree: BFA Graphic Design

Passed Industry Exams Include:

Series 65                      July 3, 2016

Disciplinary Information:

None

Other Business Activities:

None

Supervision:

Ms. Stapp and Mr. Thomas Stapp are supervised by Gregory T. Stapp.

Ms. Stapp as the CCO supervises Gregory T. Stapp.