

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

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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. 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. 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.

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 December 31, 2025 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 which was dated March 24, 2025.

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.

Additional information about Stapp Wealth Management, PLLC is also available via the SEC’s web site 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.

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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

We provide clients with access to Advyzon Reporting and Portfolio Management system which provides clients with a website portal and smartphone app where clients can view, their accounts and access certain reports.

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. The following additional terms will be noted throughout this Brochure:

- Charles Schwab & Co., Inc is referred to as “Schwab”

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 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.

Client accounts will be held at Charles Schwab & Co., Inc., a registered broker dealer and member of SIPC. Our firm maintains discretionary authority to make investment decisions and execute transactions in clients accounts held at Schwab, consistent with each client's investment objectives and guidelines.

In certain cases, such as separately managed accounts, Stapp Wealth Management, PLLC provides management services on a non-discretionary basis, with trading discretion exercised by the SMA manager.

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 based on any or all 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 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.

We provide clients with access to RightCapital financial planning software which provides clients with a website portal and smartphone app where clients have an interactive retirement planning analysis that clearly illustrates multiple scenarios, stress tests, creates a personalized plan summary with charts and notes.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide for 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. Should you choose to act upon any of our recommendations, you are not obliged to implement the financial plan through our investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

Financial Planning is included in the Investment Management Agreement fee schedule.

We charge an hourly fee for financial planning services for the US Military referrals, which is negotiable. Fees are typically due upon completion of services rendered. An 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 and tax planning 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

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 potentially exceed the initial estimate. We will notify you if the fee has exceeded the estimate.

If your tax preparation exceeds the maximum credit, an invoice indicating the tax preparation fee will be provided to you 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.

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.

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

As of December 31, 2025, we provided management services for \$144,316,134 in client assets on a discretionary basis, and \$796,746 in client assets on a non-discretionary basis.

Item 5 – Fees and Compensation

Investment management fees are charged quarterly in arrears and are calculated as a percentage of the client’s assets under management in accordance with our firm’s fee schedule. The applicable fee is based on the market value of the account on the last business day of each quarter. Fees are typically deducted directly from client accounts at Schwab, as authorized by the client, and may vary depending on account size, the scope of services provided, and negotiated terms.

The specific manner in which fees are charged by Stapp Wealth Management, PLLC is outlined in a client’s written agreement, titled the “Stapp Wealth Management, PLLC Investment Management Agreement.”

The firm fee schedule is 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, PLLC will send a written invoice that includes: the advisory fee, the formula used to calculate the fee, the actual fee calculation, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. Stapp Wealth Management, PLLC will also include the name of the custodian (Charles Schwab & Co., Inc.) on the invoice. Clients are encouraged to compare the advisory fee information on each invoice with the fees listed on the account statements received from Schwab.

Investment management fees for managed asset accounts are billed quarterly, after the end of each calendar quarter, based on the value of assets under management. Clients’ management fees will be directly debited from their accounts at Schwab, and each client

must authorize Stapp Wealth Management, PLLC to directly debit advisory fees from their custodial accounts. Clients will receive an informational copy of each billing. Management fees will be pro-rated for each capital contribution and withdrawal made during the applicable calendar quarter, other than de minimis contributions and withdrawals. Upon termination of the advisory relationship, any refund or final charge will be made on a pro-rata basis for bona fide advisory services actually rendered. Advisory fees are not negotiable.

Additional Fees and Expenses

As part of our investment advisory services, we may invest, or recommend that you invest, in mutual funds and exchange-traded funds (“ETFs”). The fees that you pay to Stapp Wealth Management, PLLC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs (as described in each fund’s prospectus) to their shareholders. These fees generally include a management fee and other fund expenses borne indirectly by you as a fund investor. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities, which are typically imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all fees charged by the mutual funds, ETFs, our firm, and any other parties. For additional information on our brokerage practices, please refer to Item 12 – Brokerage Practices in this Brochure.

Stapp Wealth Management, PLLC does not receive brokerage commissions, transaction fees, or other related costs and expenses charged by the custodian or broker-dealer. 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 funds transfer fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and ETFs also charge internal management fees and other expenses, which are disclosed in each fund’s prospectus.

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

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 with 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 \$500,000, 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 deposits 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

Our investment process is driven by a top-down macro-economic perspective, which we use to identify the prevailing economic "regime." Rather than providing a static menu of investment choices, we meet with each individual to determine the best investment strategy for them. We implement these strategies through a proprietary research framework:

- **Macro-Economic Analysis:** We evaluate global economic data—including inflation, interest rates, and GDP growth—to understand which asset classes are likely to perform well in the current environment. This helps us tilt our models toward growth, preservation, or inflation protection.
- **Fundamental Analysis:** We conduct deep-seated research into the Mutual Funds and ETFs we select. We analyze the manager's investment style, the fund's internal fee structure, and its ability to maintain its stated objectives over long market cycles.
- **All-Weather & Portable Alpha Framework:** We utilize a sophisticated "All-Weather" approach designed to diversify across economic environments. By utilizing a "Portable Alpha" framework, we aim to separate broad market exposure (Beta) from specialized, non-correlated return streams (Alpha). This allows us to combine traditional equities with alternative asset classes like managed futures, commodities, and catastrophe bonds to potentially enhance risk-adjusted returns.

- **Technical and Charting Support:** We occasionally use third-party charting and technical analysis to assist in identifying entry and exit points for specific asset classes. This helps us manage the "friction" of trading and identify shorter-term market trends that may impact our portfolio implementation.

Our Portfolio Models: Risk & Horizon Profiles

While we customize strategies for each client, we utilize five core models as the foundation for our recommendations. Each model is characterized by its risk profile and recommended time horizon:

Model	Risk Profile	Investment Horizon	Objective
Defensive Balanced	Low	Short-Term (1-3 Years)	Capital preservation and liquidity.
Conservative Balanced	Low-to-Moderate	Short-to-Med (3-5 Years)	Stability with modest inflation-hedged growth.
Balanced	Moderate	Intermediate (5-7+ Years)	Our core All-Weather strategy; seeks market growth with high diversification.
Equity-Tilted Balanced	Moderate-to-High	Long-Term (7-10+ Years)	Growth-oriented with higher volatility tolerance.
Equity	High	Very Long-Term (10+ Years)	Maximum capital appreciation; high risk of short-term loss.

Investment Strategies

We primarily employ a **Long-Term Purchase** strategy (holding securities for a year or longer). However, our macro-economic and technical research may lead us to engage in **Short-Term Purchases** or **Trading** (selling within 30 days) to rebalance portfolios or respond to rapid shifts in market conditions.

Risk of Loss

Investing in securities involves the risk of loss that you should be prepared to bear. In addition to general market volatility, our specific strategies carry the following risks:

- **Strategy Risk (All-Weather/Portable Alpha):** There is no guarantee that an All-Weather approach will protect against losses in all environments. During periods where all asset classes (stocks, bonds, and alternatives) decline simultaneously, the models will lose value.

- **Alternative Asset Risk:** Our use of non-correlated assets, such as **Managed Futures, Commodities, and Catastrophe Bonds**, introduces unique risks. These assets can be volatile, may have lower liquidity than traditional stocks, and can be influenced by weather events, geopolitical shifts, or complex mathematical model failures.
- **Leverage and Derivative Risk:** Some underlying funds we recommend may use derivatives or leverage to achieve "Portable Alpha." This can magnify both gains and losses and may lead to higher volatility than the broad market.
- **Manager & Fund Risk:** The performance of our models is dependent on the skill of the third-party fund managers we select. If a manager's strategy fails or their internal costs rise, it will negatively impact the account.
- **Technical/Charting Risk:** Technical analysis relies on historical patterns which may not repeat. Market "noise" or sudden news events can render technical indicators inaccurate.

Recommendation of Particular Type of Securities

We primarily recommend **Mutual Funds and Exchange-Traded Funds (ETFs)**.

- **ETF Market Price Risk:** During extreme volatility, an ETF's trading price may deviate significantly from its Net Asset Value (NAV).
- **Tax and Accounting:** Unless otherwise agreed in writing, we do not manage primarily for tax efficiency. Your custodian will default to **FIFO (First-In, First-Out)** cost-basis reporting. We recommend consulting with a tax professional regarding your specific situation.

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 \$500,000.

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 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

We do not maintain custody of your assets that we manage. Your assets must be maintained in an account at a "qualified custodian," generally a broker dealer.

Stapp Wealth Management, PLLC recommends that our clients use Charles Schwab & Co., Inc., ("Schwab") a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and

will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so.

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.

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capabilities to facilitate transfers to and from accounts
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability of the provider
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see Products and Services Available to Us from Schwab below)

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage-trading, custody, reporting, and related services-many which are not available to retail customers. Schwab also makes available various support services.

Some of those services help us manage or administer our clients' accounts, while others help us. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them.

Schwab's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million in assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us a quarterly service fee of \$1,200.

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

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.

Schwab makes available to us other products and services that benefit us 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.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession.

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.

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).

Block Trades

For both discretionary and non-discretionary Separate Accounts, you will authorize us, in our discretion, to bunch or aggregate orders for your account with orders of other clients and to allocate the aggregate amount of the investment among accounts in the manner in which we shall determine appropriate.

Block trading may allow trades to be executed in a timelier, equitable manner and may reduce overall transaction costs because such costs are generally shared on a pro-rated basis among all Accounts included in the block. However, you should be aware that due to differences in types of investments, and differences in client objectives, cash positions, and other factors, we cannot anticipate the number of transactions, if any, that will be effected each year through block transactions. We will have the authority to engage in block trading, unless otherwise provided in the client agreement.

Clients with non-discretionary should be aware that orders for their accounts may not be included in such block orders. In certain situations, aggregation of client orders may operate to the disadvantage of some clients, such as where an account may have been able to have its order executed at a more favorable time. We will attempt to ensure that no client is unreasonably or systematically disadvantaged through the use of block trading.

Subject to our Code of Ethics, our firm and our employees may participate in blocks orders with you, as long as we participate in the block on the same terms as you.

Item 13 - Review of Accounts

Thomas Stapp will monitor your accounts on a continuous basis and will conduct account annual reviews to ensure the advisory services provided to you and that the portfolio mix is consistent with your stated investment needs and objectives.

We offer to meet with clients on an annual basis. The level and frequency of review vary by client. Accounts are reviewed for consistency with the investment strategy and performance among other things. Reviews may be triggered various circumstances, including, but not limited to contributions, withdrawals, year-end tax planning, market moving events, retirement, security specific events or changes in your risk/return objectives. There is currently no limit placed on the number of accounts that can be review by Stapp Wealth Management, PLLC.

We will not provide you with additional or regular written reports in conjunction with account reviews. You will receive trade confirmations and monthly or quarterly statements from Schwab. We prepare regular quarterly client reports that will be posted in each client's Investment Performance Portal.

Comprehensive personal financial plans are reviewed upon request.

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

We receive written discretionary authority from the client at the outset of an advisory relationship. We have 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.

Clients 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.

In certain cases, such as separately managed accounts, Stapp Wealth Management, PLLC provides management services on a non-discretionary basis, with trading discretion exercised by the SMA manager.

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 advisers; 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. While 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 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. 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

CRD#2198693

Year of Birth: 1961

Formal Education after High School:

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

Business Background:

- Gregory T. Stapp began his career with a CPA firm in 1985.
- Licensed Certified Public Accountant in 1986 and later advanced to a shareholder position within the firm.
- CERTIFIED FINANCIAL PLANNER® professional in 1990
- Personal Financial Specialist in 1996
- Served on the Washington Society of Certified Public Accountant's Personal Financial Planning Committee in 1996.
- December of 1996 formed his own accounting and financial planning firm.
- 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.
- Formed Stapp Wealth Management, PLLC in November of 1998.

Passed Industry Exams Include:

Series 63 November 26, 1991

Series 65 December 9, 1996

Certifications: CFP®, CPA, PFS

The CERTIFIED FINANCIAL PLANNER, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 63,000 individuals have obtained CFP certification in the United States.

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

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

Examination - Pass the comprehensive CFP Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.

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

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

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

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

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

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

Disciplinary Information

Mr. Stapp does not have, nor has he ever had, any disciplinary disclosure.

Other Business Activities:

None

Supervision:

Rebecca A. Stapp, Chief Compliance Officer, and an Investment Adviser Representative is responsible for supervising the advisory activities of Gregory T. Stapp. Ms. Stapp can be reached at (360)754-8895.

Thomas M. Stapp

CRD# 7257758

Year of Birth: 1994

Formal Education after High School:

Baylor University

Degree: BBA Financial Services and Planning

Business Background:

- Stapp Wealth Management, PLLC, Member, June 2017 to Present.
- CERTIFIED FINANCIAL PLANNER® professional in 2020.
- 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.

Certifications: 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 Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 63,000 individuals have obtained CFP certification in the United States.

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

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

Examination - Pass the comprehensive CFP Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.

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

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

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

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

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

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

Disciplinary Information

Mr. Stapp does not have, nor has he ever had, any disciplinary disclosure.

Other Business Activities:

None

Supervision:

Gregory T. Stapp, Member, and an Investment Adviser Representative is responsible for supervising the advisory activities of Thomas M. Stapp. Mr. Stapp can be reached at (360)754-8895.

Rebecca A. Stapp

CRD#6586854

Birth Year: 1968

Formal Education after High School:

Saint Martin's College, Olympia

Certification: Education

Pacific Lutheran University, Tacoma

Degree: BFA Graphic Design

Business Background:

- Stapp Wealth Management, PLLC, Member, 1996 to Present.

Passed Industry Exams Include:

Series 65 July 3, 2016

Disciplinary Information

Mr. Stapp does not have, nor has he ever had, any disciplinary disclosure.

Other Business Activities:

None

Supervision:

Gregory T. Stapp, Member, and an Investment Adviser Representative is responsible for supervising the advisory activities of Rebecca A. Stapp. Mr. Stapp can be reached at (360)754-8895.