

Form ADV Part 2A Brochure



Hart Wealth Management

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This Brochure provides information about the qualifications and business practices of Hart Wealth Management ("Hart Wealth"). You should review this brochure to understand your relationship with our firm and help you determine to hire or retain us as your investment advisor. If you have any questions about the contents of this brochure, please contact us. The information in this Brochure has not been approved or verified by the United States of America Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Hart Wealth is also available on the SEC's website at www.advisorinfo.sec.gov by searching our firm name or the CRD number for Hart Wealth Management, 338236.

Hart Wealth Management is a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training.

www.hartwm.com

Item 2. Material Changes

Form ADV Part 2 requires registered investment advisors to amend their brochure when information becomes materially inaccurate. If there are any material changes to an advisor's disclosure brochure, the advisor is required to notify you and provide you with a description of the material changes.

Since the last annual amendment dated June 16, 2026, we have made the following material changes to this Disclosure Brochure:

Proxy Voting: We have updated Item 17 to reflect a change in our proxy voting policy. Our previous policy was that you as a client were responsible for voting all proxies. For all accounts solely managed by Hart Wealth that will remain true going forward. However, when accounts are managed by subadvisors, they will have authority to vote all proxies on your behalf.

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Item 4. Advisory Business

Hart Wealth Management (“Hart Wealth”, “we”, “us” or “The Firm”) provides discretionary investment management and comprehensive financial planning and tax planning services to individuals and families to help them achieve their financial goals and needs. Founded in 2025, the Firm is wholly owned by Joseph Hart.

This Disclosure Brochure describes the business of Hart Wealth Management. Certain sections will also describe the activities of *Supervised Persons*. *Supervised Persons* are any of Hart Wealth officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on Hart Wealth behalf and is subject to Hart Wealth supervision or control.

Wealth Management Services

We provide ongoing, discretionary portfolio management tailored to each client’s objectives, time horizon, liquidity needs, risk tolerance, tax considerations, and any reasonable restrictions the client imposes. Portfolios may include individual equities and debt securities, ETFs, mutual funds, cash equivalents, and, where suitable, select alternative investments. We may also advise on held-away assets by recommending allocations among options available within those products.

The Firm tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. The Firm consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints, and other related factors relevant to the management of their portfolios.

Where appropriate, Hart Wealth may also provide advice about any type of legacy position or other investment held in client portfolios. Clients may engage Hart Wealth to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer-sponsored retirement plans. In these situations, Hart Wealth directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company or the custodian designated by the product’s provider.

Clients may, at any time, request restrictions on or customizations to their accounts. However, we reserve the right not to accept and/or terminate the management of a client account if we feel that the customizations or restrictions imposed by the client, in our opinion, prevent us from managing the account in a manner that is consistent with the client’s stated investment objectives.

Clients are advised to promptly notify Hart Wealth if there are changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions upon Hart Wealth management services.

Selection of Other Advisors

We may allocate a portion of a client’s investment assets to unaffiliated independent investment managers (collectively, “Subadvisor(s)”) in accordance with the client’s designated investment objective(s). In such situations, the Subadvisor shall have day-to-day responsibility for the active discretionary management of the allocated assets. We shall continue to render investment supervisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation, and client investment objectives.

Factors that we consider when recommending a Subadvisor Manager include the client’s designated investment objective(s), management style, performance, reputation, reporting, pricing, and research. The client is under no obligation to engage a Subadvisor. The fee charged by the Subadvisor is in addition to our investment advisory fee disclosed in Item 5.

Financial Planning Services

Hart Wealth may provide its clients with a broad range of comprehensive financial planning services. These services are only offered to clients as part of ongoing wealth management services. Our Advisors review a client's financial situation which includes a review of all assets, liabilities, estate, tax and insurance needs. We will conduct an analysis of cash flow, risk tolerance, investment objectives and other evaluation tools to develop a proposed asset allocation. Intergenerational family planning services may be included as part of our financial plans.

Tax Planning & Preparation Services

Hart Wealth may provide its clients with investment-related tax planning guidance, in connection with our investment advisory services. Tax planning guidance is included in wealth management service offering. These services may include strategies for tax-loss harvesting, tax-efficient asset location, and evaluating the potential tax consequences of investment transactions.

Though some of Hart Wealth's supervised persons are certified public accountants, our tax planning services are focused solely on investments made by our clients and the related taxes. These services are not intended to replace the services of a CPA, tax preparer, or other licensed tax professional. Clients should consult with their own tax professional before implementing any tax strategies.

Hart Wealth also provides clients with tax preparation and filing services at an additional cost. This service is independent of the financial planning and investment advisory services and are governed under a separate engagement agreement. Clients have the option to engage Hart Wealth for tax preparation services, however, they are under no obligation to do so.

Retirement Plan Consulting Services

As part of our Wealth Management services we will also advise on "held away" retirement assets. We use a third-party platform to manage "held away" accounts. A held away account is an account that a client maintains that is held with a broker-dealer or custodian where we do not have a custodial relationship. For example, a 401(k)-account sponsored by a client's employer is a held away account. Prior to us managing any held away account, clients will be provided with a link allowing them to connect one or more accounts to a third-party platform. This platform will allow us to review each client's allocation and, when necessary, recommend rebalancing trades for the account to align with the target asset allocation. If we become aware that a client's account has become disconnected from the platform, we will do our best to inform that client in a timely manner.

Recommending Rollovers and Transfers

We may recommend rollovers from employer plans to IRAs we manage. This presents a conflict of interest because we earn fees on assets we manage. Clients are under no obligation to roll over assets or to have rolled-over assets managed by us. When providing rollover advice, we act as fiduciaries and document why the recommendation is in the client's best interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, they should consider the costs and benefits of: 1) Leaving the funds in their employer's (former employer's) plan; 2) moving the funds to a new employer's retirement plan; 3) cashing out and taking a taxable distribution from the plan; and/or 4) rolling the funds into an IRA rollover account. Each of these options has advantages and disadvantages and before making a change we encourage them to speak with their CPA and/or tax attorney. Our recommendations may include any of them, depending on what we feel is in their best interest.

We are fiduciaries under the Investment Advisors Act of 1940 and when we provide investment advice to them regarding their retirement plan account or individual retirement account, we are also fiduciaries within 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. As a fiduciary, we are required to document the reason(s) for why the recommendation we made is in their best interest.

Termination

If a client wishes to terminate their agreement with Hart Wealth they must give written notice. Similarly, written notice will be given by the advisor if we wish to terminate our agreement with them. If they received the Disclosure Documents less than 48 hours before they signed their agreement they have a 5-business day grace period in which they can terminate the agreement without penalty by written notice. On the date of termination, all transactions in progress will be completed in the normal course of business. When the agreement is terminated, they will be charged a prorated fee for all the services that Hart Wealth has provided during the quarter up until that point.

Assets Under Management

As of December 31, 2025, the Firm has approximately \$46,456,671.00 in assets under management. All of our assets under management are discretionary.

Item 5. Fees and Compensation

Hart Wealth offers its services on a fee-only basis. Our fees will vary on the types of advisory services we offer and may be negotiated at our sole discretion.

Wealth Management Fee (also referred to as “Advisory Fee”)

Hart Wealth annual Advisory Fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses that are incurred by the client, as discussed below. Hart Wealth does not, however, receive any portion of these commissions, transaction fees, and costs.

Hart Wealth annual advisory fee is based on the amount of assets under the Firm’s management. Fees are generally billed quarterly in arrears based on the value of assets undermanagement at quarter end.

Annual fees for client portfolios with discretionary investment management services are calculated as a percentage of assets under management according to the below blended rate tiered schedule.

Assets Under Management	Annual Investment Management Fee
\$0 to \$2,000,000	1.00%
\$2,000,001 to \$5,000,000	0.75%
\$5,000,001 to \$10,000,000	0.50%
\$10,000,000+	0.35%

Each client should refer to their advisory agreement for their specific fee rate(s).

Hart Wealth Management charges a minimum fee of \$5,000 annually. If Client’s fee is determined to be less than \$5,000 based on the fee schedule above, then the \$5,000 minimum will be charged as a flat fee, deducted quarterly in arrears.

Additional Fees and Expenses

In addition to the advisory fees paid to Hart Wealth, clients may also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively “Financial Institutions”). These additional charges may include securities brokerage commissions, transaction fees, custodial fees, charges imposed directly by a mutual fund or ETF in a client’s account as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees and other fees and taxes on brokerage accounts and securities transactions. The Firm’s brokerage practices are described at length in Item 12, below. We never receive compensation or fees from third parties for investments recommended to clients.

Financial, Retirement and Tax Planning Services

Financial Planning, Retirement Planning, and Tax Planning Services are offered as part of our Wealth Management Service and clients will not be charged a separate fee for these services.

In the case of Tax Planning Services, clients may incur additional costs related to the implementation of tax strategies, including brokerage commissions, transaction fees, and costs charged by other professionals, such as tax preparers or attorneys.

Fee Debit

Clients generally authorize Hart Wealth to directly debit their investment advisory fees from client accounts. Qualified custodians holding client assets send account statements not less frequently than quarterly, detailing transactions, including the deduction of advisory fees.

In addition, Hart Wealth provides the qualified custodian with written notice of the amount of the advisory fee to be deducted from each client account and sends clients a written invoice itemizing the fee. The invoice includes:

- The formula used to calculate the fee,
- The time period covered by the fee, and
- The value of assets under management on which the fee is based.

Partial Period Fees

For the initial period of service, advisory fees are prorated based on the number of days services are provided. The advisory agreement remains in effect until terminated by either party pursuant to the terms of the agreement. Upon termination, fees are prorated through the date of termination, and any balance due is billed or refunded, as appropriate.

Sub Advisory Fees

For clients utilizing an independent third-party Subadvisor, the fees charged for those portfolio management services are separate and distinct from the advisory fees charged by us. The Subadvisor will calculate and deduct their management fees directly from Client account(s) maintained on their platform, in accordance with the disclosure brochure and advisory agreement provided by that specific Subadvisor.

We calculate our own advisory fees separately (as outlined in the fee schedule above), which are typically deducted from your custodian account. We receive no portion of the Subadvisor fee. The total fee experienced by the client will be the combination of our advisory fee and the Subadvisor’s fee. Clients are not required to use the Subadvisor and may terminate the arrangement at any time with written notice to us.

Additions and Withdrawals

Clients may make additions to or withdrawals from their account at any time, subject to Hart Wealth's right to terminate an account. Additions may consist of cash or securities. Hart Wealth reserves the right to decline certain securities or to liquidate transferred securities.

Withdrawals may be made upon notice to Hart Wealth, subject to customary settlement procedures. Clients are advised that Hart Wealth designs portfolios for long-term investment objectives, and withdrawals may impair the achievement of those objectives.

Refund

If a client believes that they have been incorrectly billed during a certain period, they should inform their advisor, and we will investigate. If it is determined that the client has been incorrectly billed, a refund may be issued either in the form of a check or a direct debit to their custodian. The use of direct debit may be limited based on the client's custodian and applicable regulations.

Item 6. Performance-Based Fees and Side-by-Side Management

Hart Wealth does not provide any services for performance-based fees.

Item 7. Types of Clients

Hart Wealth primarily provides its services to individuals, including high net worth individuals, small businesses and corporations. We generally require a minimum of \$500,000 in investments to open an account. However, this minimum may be waived at the advisor's discretion and accounts that fall below this threshold will still be retained as clients at Hart Wealth.

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

Hart Wealth provides discretionary investment management services to clients. Clients receive the benefit of Hart Wealth's established investment philosophies and strategies, research, ongoing account monitoring, and financial planning recommendations.

Hart Wealth utilizes multiple methods of analysis in evaluating securities, including charting, fundamental analysis, and technical analysis. The primary sources of information include research materials prepared by third-party firms, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, company press releases, and financial news sources.

Each client who engages Hart Wealth for discretionary investment management services is provided with a written Investment Policy Statement ("IPS"). The IPS outlines the client's investment objectives, risk tolerance, and recommended asset allocation strategy. Hart Wealth provides specific investment recommendations, monitors client portfolios on a periodic basis, and recommends changes when appropriate.

Hart Wealth's investment advice is based upon long-term strategies that incorporate generally accepted investment principles. Hart Wealth emphasizes the use of multiple asset classes within a client portfolio to reduce volatility over extended periods. In formulating investment recommendations, Hart Wealth considers a variety of client-specific factors, including liquidity needs, tax considerations, legal or regulatory restrictions, time horizon, and other circumstances unique to the client.

Short sales, margin transactions, and options writing strategies are not generally utilized in client accounts but may

be employed upon the client's request and with client authorization.

Risk of Loss

We recommend various types of securities for clients based on 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 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 the investment. A description of the types of securities we may recommend to you and some of their inherent risks are provided below.

Recommendation of Particular Types of Securities

Money Market Funds: Money market funds are securities that seek to maintain a stable net asset value of \$1.00 per share; however, this value is not guaranteed, and it is possible to lose principal. Unlike bank deposits, money market funds are not insured by the FDIC or any other government agency.

Yields on money market funds are variable and may increase or decrease over time. While money market funds generally provide higher income than FDIC-insured savings accounts, their long-term returns are typically lower than those of riskier investments. As a result, investors are subject to the risk that inflation may erode purchasing power over extended periods.

Municipal Securities: Municipal securities, while generally thought of as safe, can have significant risks associated with them including, but not limited to: the credit worthiness of the governmental entity that issues the bond; the stability of the revenue stream that is used to pay the interest to the bondholders; when the bond is due to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same amount of interest or yield to maturity.

Bonds: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and the overall health of the economy. In general, larger, better-established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds ("ETF") 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. The returns on mutual funds and ETFs can be reduced by the costs 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 funds 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

whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. ETFs may have tracking error risks. For example, the ETF investment advisor may not be able to cause the ETF's performance to match that of the Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index, but which are expected to yield similar performance.

Sub Advisory Risks

We may recommend or select an independent third-party Subadvisor to manage a portion of client portfolios. When doing so, our primary analysis involves evaluating the client's suitability and the Subadvisor's investment philosophy, track record, operational stability, and risk management practices.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear. While recommending a Subadvisor aims to optimize portfolio outcomes, strategies implemented using Subadvisor(s) presents risks in addition to those described above:

Subadvisor Risk: The success of your portfolio depends significantly on the skill, judgment, and operational execution of the selected Subadvisor. There is a risk that the Subadvisor's investment decisions or trading execution will not achieve their intended objectives or will underperform the broader market.

Manager Discretion and Trading Style Risk: Because the Subadvisor is granted discretionary authority to manage the day-to-day trading of the allocated assets, their investment style may do better or worse than the market. Strategies utilized by Subadvisors may involve the frequent buying and selling of securities, which can increase transaction costs.

Performance Deviation/Divergence Risk: Portfolios managed by Subadvisors may not perfectly replicate the performance of a target underlying benchmark index or model strategy. Performance divergence can be caused by custom client constraints (such as excluding specific sectors or stocks) and the Subadvisor's specific optimization or sampling techniques. Consequently, client portfolio performance may diverge, either positively or negatively, from the target benchmark or model.

Management Through Similarly Managed Accounts

Hart Wealth primarily manages portfolios by allocating portfolio assets among various securities on a discretionary basis using one or more of its proprietary investment strategies (collectively referred to as "*investment strategy*"). In so doing, Hart Wealth buys, sells, exchanges and/or transfers securities based upon the *investment strategy*.

Hart Wealth management using the *investment strategy* complies with the requirements of Rule 3a-4 of the Investment Company Act of 1940, as amended. Rule 3a-4 provides similarly managed accounts, such as the *investment strategy*, with a safe harbor from the definition of an investment company. Certain investment opportunities that become available to Hart Wealth clients may be limited. As further discussed below in response to Item 12B, Hart Wealth allocates investment opportunities among its clients on a fair and equitable basis.

Item 9. Disciplinary Information

Hart Wealth is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of management. Hart Wealth does not have any required disclosures to this Item.

Item 10. Other Financial Industry Activities and Affiliations

Hart Wealth is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons.

O'Shaughnessy Asset Management, LLC

Hart Wealth has entered into a subadvisory arrangement with O'Shaughnessy Asset Management, LLC ("OSAM"), an SEC-registered investment advisor, under which OSAM may provide discretionary investment management services for all or a portion of certain client accounts. For accounts utilizing OSAM's Canvas® investment platform, OSAM constructs and manages portfolios based on the selected investment strategy. OSAM may also delegate certain investment management responsibilities to one or more affiliated SEC-registered subadvisors; however, OSAM remains responsible for the acts and omissions of any such affiliated subadvisor under the terms of its agreement with Hart Wealth.

Hart Wealth retains responsibility for advising clients regarding the suitability of engaging OSAM, selecting an appropriate investment strategy, and monitoring the ongoing suitability of the relationship and investment approach. Hart Wealth remains the client's primary advisor and is responsible for understanding the client's financial circumstances, investment objectives, and any applicable investment restrictions. OSAM does not provide financial planning services and does not determine the suitability of its strategies for any client.

OSAM and its affiliated subadvisors provide investment advisory services to other clients and may take actions for those clients that differ from actions taken for Hart Wealth clients. Accordingly, transactions in the same securities may not be executed for all clients at the same time or at the same price. In addition, OSAM does not guarantee the future performance of any account, investment strategy, or investment program.

Accountants

Certain of Hart Wealth's supervised persons are licensed as Certified Public Accountants ("CPAs") and may provide tax preparation services to clients in their separate capacities as CPAs. These services are provided separately from our investment advisory services but are provided under Hart Wealth. None of Hart Wealth's supervised persons licensed as CPAs are employed nor affiliated with outside accounting firms.

While our investment advisory services may include investment-related tax planning, tax preparation and accounting services are not included in our advisory fee unless otherwise agreed in writing. If clients choose to engage our CPAs for tax preparation or accounting services, they will enter into a separate agreement for such services and will be billed under a separate fee schedule.

This arrangement creates a potential conflict of interest because our CPAs have a financial incentive to recommend additional services. We address this conflict by informing clients that they are under no obligation to engage our CPAs for these services and may select any accounting or tax professional of their choosing.

Item 11. Code of Ethics

Our Code of Ethics

Hart Wealth is committed to providing investment advice with the utmost professionalism and integrity. Our firm strives to identify manage and/or mitigate conflicts of interest and has adopted policies, procedures and oversight mechanisms to address conflicts of interest. We have adopted a Code of Ethics that emphasizes our fiduciary obligation to put client interests first and is designed to ensure personal securities transactions, activities, and interests of employees will not interfere with the responsibilities to make decisions in the best interest of clients. All supervised persons of our firm must acknowledge and comply with our Code of Ethics.

Employee Personal Trading

Hart Wealth and persons associated with Hart Wealth (“Associated Persons”) are permitted to buy or sell securities that it also recommends to clients consistent with Hart Wealth policies and procedures. Hart Wealth has adopted a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws (“Code of Ethics”). Hart Wealth Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by Hart Wealth or any of its associated persons. The Code of Ethics also requires that certain of Hart Wealth personnel (called “Access Persons”) report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Hart Wealth 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 of Ethics, 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 Hart Wealth clients. Nonetheless, because the Code of Ethics 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 Hart Wealth and its clients. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Hart Wealth 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. Hart Wealth 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

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

This *Code of Ethics* has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by *Access Persons* to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above. **Clients and prospective clients may contact Hart Wealth to request a copy of its *Code of Ethics*.**

Item 12. Brokerage Practices

Hart Wealth recommends the brokerage and custodial services of Charles Schwab & Co., Inc. ("Schwab"). Schwab are registered broker-dealers that charge brokerage commissions or transaction fees for effecting securities transactions. Hart Wealth recommends the services of Schwab based on a number of factors including financial strength, reputation, execution, pricing, responsiveness, fees, research, and other services.

Broker-Dealer Selection

Where Hart Wealth has discretionary management authority, it is authorized to determine, without specific client consent, the broker-dealer used for placing trades. Hart Wealth's discretionary authority over the account may be subject to guidelines and limitations imposed by the client. Such limitations may include requiring Hart Wealth to use a particular broker-dealer, to seek specific commission rates or dealer spreads, and/or other guidelines or restrictions in various areas, including, but not limited to, investments in particular companies, industries, geographies, security types, or asset classes, etc.

Hart Wealth's objective in selecting broker-dealers and in effecting portfolio transactions is to seek the best combination of price and execution with respect to its clients' portfolio transactions. The best net price, giving consideration to brokerage commissions, spreads and other costs, is an important factor in this decision, but a number of other factors are also considered. These factors include, but are not limited to: Hart Wealth's knowledge of negotiated commission rates and spreads currently available; the nature of the security to be traded; the size and type of transaction; the nature and character of the markets for the security to be purchased or sold; the desired timing of the trade; the activity existing and expected in the market for the particular security; confidentiality and anonymity; execution; clearance and settlement capabilities as well as the broker-dealer's reputation and perceived financial soundness; Hart Wealth's knowledge of broker-dealer operational problems; the broker-dealer's execution services rendered on a continuing basis and in other transactions; and the reasonableness of spreads or commissions. To the extent that the executing broker provides research services, Hart Wealth also considers the quality and usefulness of these services. The relationships with brokerage firms that provide soft dollar research services to Hart Wealth may influence Hart Wealth's judgment in allocating brokerage business and could create a conflict of interest. Hart Wealth may also place trades with brokers who generate proprietary research, including buy and sell recommendations on individual securities, if these broker arrangements satisfy Hart Wealth's best execution standards.

Aggregation of Orders

Hart Wealth will generally block trades where possible and when advantageous to clients. Certain trades will be effected independently. The blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts where transaction costs are shared equally and on a pro-rated basis between all accounts included in the block. Block trading allows us to execute equity or fixed income trades in a timely, equitable manner and to reduce overall commission charges to clients. Clients who do not provide Hart Wealth with discretion will not participate in block trades, and their trades in similar securities will be placed with brokers after trades for discretionary accounts. Accounts owned by supervised persons of our firm may participate in block trading with all client accounts; however, these individuals will not be given preferential treatment of any kind.

Tax Loss Harvesting

When implementing tax-loss harvesting or other tax-sensitive strategies, we may consider the timing of trades, selection of securities, and other factors intended to reduce realized taxable gains. These considerations may impact portfolio performance and could result in higher transaction costs.

Item 13. Review of Accounts

Hart Wealth monitors clients' portfolios as part of an ongoing process while regular account reviews are conducted on at least an annual basis for clients. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with Hart Wealth and to keep Hart Wealth informed of any changes thereto. Hart Wealth contacts ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact of any changes in the client's financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. Clients should compare the account statements they receive from their custodian with those they receive from Hart Wealth.

Item 14. Client Referrals and Other Compensation

Hart Wealth is required to disclose any relationship or arrangement where it receives an economic benefit from a third party (non-client) for providing advisory services. In addition, Hart Wealth is required to disclose any direct or indirect compensation that it provides to any person who is not a supervised person for client referrals. The Firm does not currently provide compensation to any third-party solicitors for client referrals.

Hart Wealth receives compensation from Schwab, the broker-dealer used for each clients account, and their account custodian in the form of access to electronic systems that assist us in the management of client accounts, as well as research, software and other technology that provide access to client account data (such as trade confirmations and account statements), pricing information and other market data, facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), and client reporting capabilities. Client's account custodian also offers Hart Wealth discounts for products and services offered by vendors and third-party service providers, such as software and technology solutions. These economic benefits create a conflict of interest in that it gives our firm an incentive to recommend one broker-dealer or custodian over another that does not provide similar electronic systems, support or services. We address this conflict of interest by disclosing to our clients the types of compensation that our firm receives so clients can consider this when evaluating our firm. It is important that clients consider the fees, level of service and investment strategies, among other factors, when selecting an investment manager.

Item 15. Custody

When a client establishes a relationship with our firm for investment management services, their assets will be maintained by a bank, broker-dealer, mutual fund transfer agent or other such institution deemed a 'qualified custodian' by the SEC. We rely on the custodian to price and value assets, execute and clear transactions, maintain custody of assets in their account and perform other custodial functions. Hart Wealth does not maintain physical possession of any client account assets. Clients' assets must be held by a bank, broker dealer, mutual fund transfer agent or other such institution deemed a qualified custodian. We utilize Schwab as the qualified custodian for client accounts.

Nevertheless, Hart Wealth is deemed to have custody, pursuant to Rule 191—50.39(502) of the Iowa Administrative Code as amended, due to its authority to deduct fees directly from client accounts. Pursuant to this rule, Hart Wealth only has custody of funds for the purpose of paying advisory fees. As stated above, Hart Wealth utilizes a qualified custodian to maintain all client assets. Hart Wealth will obtain written authorization from clients to deduct fees directly from the account held with the qualified custodian. We will also send a statement to clients each time our advisory fee is deducted, detailing the formula used to calculate the fee, the assets under management on which the fee is based and the time period covered by the fee.

Item 16. Investment Discretion

Hart Wealth is given the authority to exercise investment discretion on behalf of clients. Hart Wealth is considered to exercise investment discretion over a client's account if it can affect transactions for the client without first having to seek the client's consent. Hart Wealth is given this authority through a limited power-of-attorney included in the agreement between Hart Wealth and the client. Clients may request a limitation on this authority (such as certain securities not to be bought or sold). Hart Wealth takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are made.

Item 17. Voting Client Securities

Hart Wealth does not vote proxies on behalf of clients. However, when Hart Wealth designates a subadvisor to manage an account, the proxy votes for that account will be passed on to the subadvisor to manage. The subadvisor will have sole discretion, and Hart Wealth will not instruct subadvisors on whether proxies should be voted nor how to vote them. Clients whose accounts are managed solely by Hart Wealth will receive proxy statements directly from their qualified custodian.

Item 18. Financial Information

Hart Wealth does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. In addition, Hart Wealth is required to disclose any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients. At this time, we reasonably believe that our firm is able to meet all of our contractual commitments

Item 19. Requirements for State-Registered Advisors

Neither Hart Wealth Management or any supervised persons have been found liable in a civil, self-regulatory organization, administrative proceeding, or arbitration claim involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

Neither Hart Wealth Management nor any supervised persons are compensated based on investment performance or paid performance-based fees.

Neither Hart Wealth Management nor any of its management persons have a relationship or arrangement with any issuer of securities.

ADV Part 2B Brochure Supplement – Joseph Hart

Item 1 – Cover Page

Joseph Hart

CRD # 7004309

Hart Wealth Management

**5550 Wild Rose Lane Suite 400
West Des Moines, IA 50266
515-229-8722**

February 24, 2026

This Brochure supplement provides information about Joseph Hart and supplements the Hart Wealth Management (“Hart Wealth”) Brochure. You should have received a copy of that Brochure. Please contact Joseph Hart if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph Hart CRD# 7004309 is available on the SEC’s website at www.advisorinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Full Legal Name: Joseph Stephen Hart

Year of Birth: 1985

Education

University of Iowa

Bachelor in Accounting and Finance – 2009

Certifications

CERTIFIED FINANCIAL PLANNER™ – 2020

Certified Public Accountant – 2010

CERTIFIED FINANCIAL PLANNER® professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and I may use these and the other certification marks (the “CFP Board Certification Marks”) that Certified Financial Planner Board of Standards Center for Financial Planning, Inc. has licensed to CFP Board in the United States. The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net. CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor’s degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor’s or higher degree or completed a financial planning development capstone course.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

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

- **Ethics** – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Certified Public Accountant (CPA)

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period).

Background

Hart Wealth Management LLC
Founder & Lead Advisor, 08/2025-Present

West Financial Advisors, LLC
Lead Advisor & Tax Manager, 08/2018-08/2025

RSM US LLP
Audit Manager, 11/2009-08/2018

Item 3 – Disciplinary Information

Mr. Hart has no legal or disciplinary events that are material to a client's or prospective client's evaluation of him.

Item 4 – Other Business Activities

In addition to his investment advisory activities, Mr. Hart is licensed as a Certified Public Accountant and provides tax preparation and accounting services. These services are offered separate and apart from his role as an investment advisor representative. Clients who engage Mr. Hart for accounting or tax preparation services will enter into a separate agreement and will be charged under a separate fee schedule.

This dual role creates a potential conflict of interest because Mr. Hart has a financial incentive to recommend tax or accounting services to clients of the advisory firm. Clients are not obligated to use Mr. Hart for such services and may obtain them from any provider of their choice. Hart Wealth seeks to ensure that all recommendations are made in the best interests of clients regardless of additional compensation.

Item 5 – Additional Compensation

Mr. Hart does not receive any cash or non-cash compensation for providing advisory services to non- clients.

Item 6 – Supervision

Joseph Hart is the owner of the firm. Mr. Hart adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

Item 7 – Requirements for State-Registered Advisors

Joseph Hart has no reportable events to disclose here.