Item 1 – Cover Page

Oath Planning, LLC

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Tulsa, Oklahoma 74105
https://oathplanning.com

February 3, 2026

This Brochure provides information about the qualifications and business practices of Oath Planning, LLC ("Oath Planning"). If you have any questions about the contents of this Brochure, please contact us at (888) 534-4330. 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.

Oath Planning is registered as an Investment Adviser with the Securities and Exchange Commission ("SEC"). Registration as an investment adviser does not imply any level of skill or training.

Additional information about Oath Planning also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Oath Planning is 299187.

Item 2 – Material Changes

This Item of the Brochure will discuss specific material changes, if any, that are made to the Brochure and provide clients with a summary of such changes since the previous amendment on February 19, 2025.

- Oath Planning has updated its minimum account size requirement. See Item 7 for more information.

Currently, our Brochure may be requested by contacting Rod Yancy, Chief Compliance Officer at (888) 534-4330.

Additional information about Oath Planning is available via the SEC's website www.adviserinfo.sec.gov. The SEC's website provides information about any persons affiliated with Oath Planning who are registered or are required to be registered as investment adviser representatives of Oath Planning.

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Item 4 – Advisory Business

Oath Planning is owned by Rod Yancy, who is also the President and Chief Compliance Officer ('CCO') and was established in 2018. As of December 31, 2025, Oath Planning managed $284,681,416 on a discretionary basis and $0 on a non-discretionary basis.

Investment Management Services

Oath Planning manages investment portfolios for individuals, qualified retirement plans, trusts, not-for-profits and small businesses. Oath Planning will work with the client to determine the client's investment objectives and investor risk profile and will design a written investment policy statement. Oath Planning uses investment and portfolio allocation software to evaluate alternative portfolio designs. Oath Planning evaluates the client's existing investments with respect to the client's investment policy statement and works with new clients to develop a plan to transition from the client's existing portfolio to the portfolio recommended by Oath Planning. Oath Planning will then continuously monitor the client's portfolio holdings and the overall asset allocation strategy and hold review meetings with the client regarding the account as necessary, and upon request by the client.

Oath Planning will typically create a portfolio of no-load mutual funds and may use model portfolios if the models match the client's investment policy. Oath Planning will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. Oath Planning primarily recommends portfolios consisting of passively managed asset class and index mutual funds, such as Dimensional Fund Advisors (DFA) mutual funds. DFA sponsored mutual funds follow a passive asset class investment philosophy with low holdings turnover. Consequently, the DFA fund fees are generally lower than fees and expenses charged by other types of funds.

Client portfolios may also include some individual equity securities in situations where disposition of these securities would present an overriding tax implication, or the client specifically requests they be retained for a personal reason. Some such assets may be held but not considered as part of the relationship for billing or in the IPS, due to client preferences.

Oath Planning manages mutual fund and equity portfolios on a discretionary or nondiscretionary basis. Clients may impose any reasonable restrictions on Oath Planning's discretionary authority, including restrictions on the types of securities in which Oath Planning may invest the client's assets and on specific securities that the client may believe to be appropriate.

Oath Planning may also recommend fixed income portfolios to advisory clients, which consist of managed accounts of individual bonds. Oath Planning will request discretionary authority from advisory clients to manage fixed income portfolios, including the discretion to retain a third-party fixed income manager. These sub-advisory services will be provided by Focus Partners Advisor Solutions, LLC ("Focus Partners"). Oath Planning will prepare a separate Fixed Income Investment Policy Statement for any client qualifying for separate fixed income portfolio services.

Pursuant to its discretionary authority, Oath Planning may retain a fixed income securities manager. The fixed income securities manager will be provided with the discretionary authority to

invest client assets in fixed income securities consistent with the client's Fixed Income Investment Policy Statement. The manager will also monitor the account for changes in credit ratings, security call provisions, and tax loss harvesting opportunities (to the extent that the manager is provided with cost basis information). The manager will obtain Oath Planning's consent prior to the sale of any client securities.

On an ongoing basis, Oath Planning will answer clients' inquiries regarding their accounts and review with clients the performance of their accounts. Utilizing Drift Reports available daily, Oath Planning will review client's investment policy, risk profile, and discuss the re-balancing of each client's accounts to the extent appropriate. Oath Planning will provide to the investment manager any updated client financial information or account restrictions necessary for the investment manager to provide sub-advisory services.

Oath Planning's Investment Management Services are offered at different service levels based on the total assets under management ("AUM") a client has with Oath Planning (see Item 5 for AUM tiers).

The three service levels are Silver, Gold and Platinum. Clients in all services level will receive the service outlined above. In addition, each service level will receive the following:

- Silver:
    - Annual Review
- Gold:
    - Required minimum distribution management.
    - Semi-Annual Reviews
- Platinum
    - Required minimum distribution management
    - Tax minimization
    - Quarterly Reviews

Focus Partners Advisor Solutions, LLC Sub-Advisory Services

Oath Planning has retained Focus Partners Advisor Solutions, LLC to act as a sub-advisor for certain client accounts. Focus Partners Advisor Solutions, LLC shall provide various model asset allocation portfolios (each a "Portfolio", collectively "Portfolios") for selection by Oath Planning. Focus Partners may provide portfolio management services for both equity and fixed income models. Each Portfolio strives to achieve long-term risk and return objectives through diversification among multiple asset classes using investment options available to Focus Partners, which may include, but is not limited to, mutual funds and/or exchange traded funds from Dimensional Fund Advisors LP, Bridgeway Capital Management, Inc., AQR Capital Management, LLC, The Vanguard Group, Inc., Stoneridge Asset Management, LLC or other providers selected by Focus Partners. Each Portfolio is designed to meet a particular investment goal which Oath Planning has determined is suitable based on the client's circumstances. Once the appropriate Portfolio(s) has been determined, the Portfolio will continuously be managed based on the portfolio's goal and Focus Partners will have the discretionary authority to manage the Portfolio(s), including rebalancing. However, Advisor, on behalf of its client, will have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Should material life events occur, clients should immediately contact Advisor to determine if changes to an account and the allocation of the assets held in the account are

necessary.

Clients of Oath Planning may utilize a brokerage platform provided by the Charles Schwab & Company, Inc., ("Schwab"), Fidelity Brokerage Services, LLC ("Fidelity"), or Altruist Financial LLC ("Altruist"). Clients selecting the Schwab or Fidelity custodial platforms will have assets managed through models created by Focus Partners, while clients selecting the Altruist platform will have assets managed by a proprietary model of Oath Planning.

Financial Planning Services:

Clients may hold or retain other types of assets as well, and Oath Planning may offer advice regarding those various assets as part of its services. Advice regarding such assets will generally not involve asset management services but may help to more generally assist the client.

Oath Planning also provides advice in the form of Financial Planning. Clients purchasing this service may receive various written financial reports, providing the client with detailed financial information designed to achieve their stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern:

- Personal: Family records, budgeting, personal liability, estate information and financial goals.
- Education: Education IRAs, financial aid, state savings plans, grants and general assistance in preparing to meet dependent's continuing educational needs through development of an education plan.
- Risk: Review of existing insurance policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- Tax & Cash Flow: Income tax and spending analysis and planning for past, current and future years.
- Death & Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- Investments: Analysis of current and alternative investment holdings and costs, examining the potential long-term effects on a client's portfolio, recommending appropriate investment options, allocations, or adjustments.

Oath Planning gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed and a written report is typically prepared. Should a client choose to implement the recommendations in the plan, Oath Planning suggests the client work closely with his/her attorney, accountant or insurance agent. Implementation of financial plan recommendations are entirely at the client's discretion. Clients are encouraged to review their plan on a regular basis, especially if there are any changes in their financial situation, goals, needs, or investment objectives.

Estate Planning Services

Oath Planning offers estate planning through its affiliated law firm, Oath Law. The services include amendments and restatements of legal documents such as wills, trusts, powers of attorney, and advance directives.

Item 5 – Fees and Compensation

In certain circumstances, all fees, fee minimums and their applications to family circumstances may be negotiable. Accounts for members of the same family and/or related accounts may be aggregated and assessed fees on the total balance of all related accounts. Additionally, and on a case-by-case basis, Oath Planning may charge its below stated advisory fee (or a negotiated fee if it has been agreed upon with client) on client's legacy positions or unmanaged assets when those assets/positions are being considered within the client's overall investment strategy.

Oath Planning has contracted with Focus Partners Advisor Solutions, LLC, for services including trade processing, collection of management fees, record maintenance, report preparation, marketing assistance, and research. As disclosed in Item 4 above, Oath Planning has also contracted with Focus Partners Advisor Solutions, LLC for sub-advisory services with respect to Clients' fixed income accounts. Oath Planning pays a fee for Focus Partners Advisor Solutions, LLC's services based on management fees paid to Oath Planning on accounts that use Focus Partners Advisor Solutions, LLC. The fee paid by Oath Planning to Focus Partners Advisor Solutions, LLC consists of a portion of the fee paid by clients to Oath Planning and varies based on the total client assets participating in Focus Partners Advisor Solutions, LLC through Oath Planning. The fees will equal (on an annualized basis) twenty-five basis points (0.25%) of the fair market value of Sub-Advised Assets for each account on the last business day of the billing quarter. These fees are not separately charged to advisory clients. As a service provider assisting with trade processing, trade errors in client accounts may be caused by Focus Partners Advisor Solutions, LLC. According to Focus Partners Advisor Solutions, LLC's policies, our clients will be made whole by Focus Partners Advisor Solutions, LLC in the event of any losses caused by Focus Partners Advisor Solutions, LLC. In addition, Oath Planning's policy pertaining to trade errors is to always make the client whole.

The specific manner in which fees are charged by Oath Planning is established in a client's written agreement with Oath Planning. Generally, clients will be invoiced in advance at the beginning of each calendar quarter based upon the value (market value based on independent third party sources or fair market value in the absence of market value; client account balances on which Oath Planning calculates fees may vary from account custodial statements based on independent asset valuations and other accounting variances, including mechanisms for including accrued interest in account statements), of the client's account at the end of the previous quarter. New accounts are charged as of the 1st day of the month following the implementation of the investment strategy.

Oath Planning will request authority from the client to receive quarterly payments directly from the client's account held by an independent custodian. Clients will be asked to provide written limited authorization to Oath Planning or its designated service provider, Focus Partners Advisor Solutions, LLC, to withdraw fees from the account. Certain custodians and other administrators will calculate and debit Oath Planning's fee and remit such fee to Oath Planning. Oath Planning will provide the client an invoice showing the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the fee was calculated. Clients should

verify the accuracy of the fee calculations in such invoices. Client custodians will send at least quarterly statements directly to the client. Custodial statements will only show the amount of the advisory fee.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days' written notice. Upon termination of any account at any time after the required 30-day notice, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

All fees paid to Oath Planning for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. Oath Planning's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in mutual funds directly, without the services of Oath Planning. In that case, the client would not receive the services provided by Oath Planning which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Certain funds also may not be available to the client directly. Accordingly, the client should review both the fees charged by the funds and the fees charged by Oath Planning to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional information regarding brokerage practices may be found in Item 12.

Advisory Fees

Investment Management Services

The annual fee for investment management services will be charged as a percentage of assets under management, according to the service level selected by the client. The service level and the corresponding fee are outlined below:

Total Assets Under Management: Less than $500,000

Service Level	Annual Fee (%)
SILVER	0.98%
GOLD	1.18%
PLATINUM	1.48%

Total Assets Under Management: $500,000 to $1,000,000

Service Level	Annual Fee (%)
SILVER	0.98%
GOLD	0.98%
PLATINUM	1.18%

Total Assets Under Management: **More than $1,000,000**

Service Level	Annual Fee (%)
SILVER	0.98%
GOLD	0.98%
PLATINUM	0.98%

All fees are negotiable. All accounts for members of the client's family (spouse and dependent children) be assessed fees based on the total balance of all accounts. Fees will be assessed on the total aggregate of the accounts unless the client requests otherwise.

Estate Planning Services

The client is under no obligation to use Oath Planning's estate planning services. If the Investment Management client chooses to use another attorney for these services, Oath Planning will provide a Third-Party authorization and communicate with the client's chosen attorney.

Additional Financial Services:

For additional financial services, Oath Planning fees shall be charged on an hourly basis, ranging from $300 to $1,000 per hour, depending on the nature and complexity of Client's circumstances and upon mutual agreement with Client. Such fee will not exceed 3.0% or greater of the assets under management. Oath Planning's Financial Service clients are subject to a minimum hourly requirement of 2.5 hours per quarter, at Oath Planning's agreed upon hourly rate.

Oath Planning shall bill Client quarterly in advance for the quarterly minimum of 2.5 hours, as provided for by their Agreement. These services will be provided within the first six months. Any additional hours spent providing planning services, above and beyond the 2.5 hour minimum, shall be billed quarterly in arrears, at Planner's agreed upon hourly rate.

Please note: Investment Management clients receive financial planning services at no additional cost.

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

Oath Planning does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) and does not participate in Side-By-Side Management. All fees are calculated as described above and are not charged on the basis of income or capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

Item 7 – Types of Clients

Oath Planning manages investment portfolios for individuals, high net worth individuals, and

trusts.

Minimum Account Sizes

Oath Planning requires a minimum account size of $300,000. We will consider waiving the $300,000 minimum on a case-by-case basis.

Please refer to Item 5 of this Brochure for complete fee billing details.

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

Methods of Analysis and Investment Strategy

Oath Planning's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. Oath Planning's investment approach is firmly rooted in the belief that markets are "efficient" over periods of time and that investors' long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. Oath Planning recommends diversified portfolios, principally through the use of passively managed, asset class mutual funds. Oath Planning selects or recommends to clients' portfolios of securities, principally broadly traded open end mutual funds or conservative fixed income securities to implement this investment strategy.

Oath Planning also utilizes historical database software from Morningstar and Dimensional Fund Advisors as well as reported information directly from the fund provider or carrier and/or their website.

Although all investments involve risk, Oath Planning's investment advice seeks to limit risk through broad diversification among asset classes and, as appropriate for particular clients the investment directly in conservative fixed income securities to represent the fixed income class. Oath Planning's investment philosophy is designed for investors who desire a buy and hold strategy. Frequent trading of securities increases brokerage and other transaction costs that Oath Planning's strategy seeks to minimize. A client taking a buy and hold strategy could pay less when utilizing a broker-dealer paying transactional (commissions) as compared to an advisory account which charges an ongoing fee based on assets under management.

In the implementation of investment plans, Oath Planning therefore primarily uses mutual funds and, as appropriate, portfolios of conservative fixed income securities. Oath Planning may also utilize Exchange Traded Funds (ETFs) to represent a market sector.

Oath Planning's strategies do not utilize securities that we believe would be classified as having any unusual risks, and we do not recommend frequent trading, which can increase brokerage and other costs and taxes.

Oath Planning does not typically recommend the purchase of securities on margin. However, if a client account has a short-term cash need, Oath Planning may suggest the use of margin to raise the funds necessary in lieu of selling securities held in an account. Oath Planning may also recommend the use of long-term investment techniques such as dollar-cost averaging.

Oath Planning receives supporting research from Focus Partners Advisor Solutions, LLC and from other consultants, including economists affiliated with Dimensional Fund Advisors ("DFA"). Oath

Planning utilizes DFA mutual funds, among others, in client portfolios. DFA mutual funds follow a passive asset class investment philosophy with low holdings turnover. DFA provides historical market analysis, risk/return analysis, and continuing education to Oath Planning.

Analysis of a Client's Financial Situation

In the development of investment plans for clients, including the recommendation of an appropriate asset allocation, Oath Planning relies on an analysis of the client's financial objectives, current and estimated future resources, clients time horizons and tolerance for risk. We will work with a client to determine the client's investment objectives and investor risk profile and will design a written investment policy statement which will govern the client relationship. To derive a recommended asset allocation, Oath Planning may use a Monte Carlo simulation, a standard statistical approach for dealing with uncertainty. As with any other methods used to make projections into the future, there are several risks associated with this method, which may result in the client not being able to achieve their financial goals. They include:

- The risk that expected future cash flows will not match those used in the analysis
- The risk that future rates of return will fall short of the estimates used in the simulation
- The risk that inflation will exceed the estimates used in the simulation
- For taxable clients, the risk that tax rates will be higher than was assumed in the analysis

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.
All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs, individual bonds and equity securities), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original amount invested.

The mutual funds and ETFs utilized by Oath Planning may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include large capitalization, medium capitalization and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in Oath Planning's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Short duration, high quality securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds utilized by Oath Planning may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

Equity Securities

In general, prices of equity securities (common, convertible preferred stocks and other securities whose values are tied to the price of stocks, such as rights, warrants and convertible debt securities) are more volatile than those of fixed-income securities. The prices of equity securities could decline in value if the issuer's financial condition declines or in response to overall market and economic conditions. Investments in smaller companies and mid-size companies may involve greater risk and price volatility than investments in larger, more mature companies.

Fixed-Income Securities

The return and principal value of bonds fluctuate with changes in market conditions. Fixed-income securities are subject to interest rate risk and credit quality risk. The market value of fixed-income securities generally declines when interest rates rise, and an issuer of fixed-income securities could default on its payment obligations. Changes in interest rates generally have a greater effect on bonds with longer maturities than on those with shorter maturities. If bonds are not held to maturity, they may be worth more or less than their original value. Credit risk refers to the possibility that the issuer of a bond will not be able to make principal and/or interest payments. High yield bonds, also known as "junk bonds," carry higher risk of loss of principal and income than higher rated investment grade bonds.

Mutual Funds

Mutual funds may invest in different types of securities, such as value or growth stocks, real estate investment trusts, corporate bonds or U.S. government bonds. There are risks associated with each asset class.

An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency. Although money market funds seek to preserve the value of your investment at $1.00 per share, it is possible to lose money by investing in the fund. Redemption is at the current net asset value, which may be more or less than the original cost. Aggressive growth funds are most suitable for investors willing to accept price per share volatility since many companies that demonstrate high growth potential can also be high risk. Income from tax-free mutual funds may be subject to local, state and/or the alternative minimum tax.

Because each mutual fund owns different types of investments, performance will be affected by a variety of factors. The value of your investment in a mutual fund will vary from day to day as the values of the underlying investments in a fund vary. Such variations generally reflect changes in interest rates, market conditions and other company and economic news. These risks may become magnified depending on how much a fund invests or uses certain strategies. A fund's principal market segment(s), such as large-cap, mid-cap or small-cap stocks, or growth or value stocks may underperform other market segments or the equity markets as a whole. You can find additional

information regarding these risks in the fund's prospectus.

Exchange-Traded Funds (ETFs)

ETFs are typically investment companies that are legally classified as open-end mutual funds or unit investment trusts. ETFs differ from traditional mutual funds in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and ask price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Liquidity risks are higher for ETFs with a large spread. ETFs may be closed and liquidated at the discretion of the issuing company.

International Investing

The risks of investing in foreign securities include loss of value as a result of political or economic instability; nationalization, expropriation or confiscatory taxation; changes in foreign exchange rates and foreign exchange restrictions; settlement delays; and limited government regulation (including less stringent reporting, accounting, and disclosure standards than are required of U.S. companies). These risks may be greater with investments in emerging markets. Certain investments utilized by the Firm may also contain international securities.

Cash and Cash Equivalents

A portion of your assets may be invested in cash or cash equivalents to achieve your investment objective, provide ongoing distributions, and/or take a defensive position. Cash holdings may result in a loss of market exposure.

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 Oath Planning or the integrity of Oath Planning's management. Oath Planning has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Affiliated Law Firm

Certain Members of Oath Planning are also attorneys of Oath Law, P.C. In their individual capacity as lawyers providing legal assistance, they will be compensated accordingly. Oath Planning and Oath Law are also under common ownership. Client retains the right to decide to act on the recommendation of utilizing outside services provided. Clients always retain the right to determine whether to engage the affiliated law firm for additional legal services. The ability to retain our affiliated law firm creates a conflict of interest as we have the incentive to recommend an affiliate

that will be compensated for its services.

Insurance Services

Certain members of Oath Planning are licensed insurance agents and may offer and sell term and permanent life insurance products and fixed annuity products. These individuals are licensed in their individual capacity and are therefore able to recommend and sell insurance products, including annuity products. As such, these individuals will be able to receive separate yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients are under no obligation to obtain insurance products from Oath Planning.

Any recommendation to use the services of Oath Law, P.C. or insurance services presents a conflict of interest as a result of the shared ownership and personnel. Oath Planning addresses this conflict of interest by upholding our fiduciary duty to provide investment advice that is in the best interest of the client and disclosing the conflict to you before or at the time you enter into an investment advisory contract with our Firm. As a fiduciary, we will ensure any recommendation to retain Oath Law, P.C., is accompanied by disclosure of the conflict of interest and fees/commissions paid.

Focus Partners Advisor Solutions, LLC

As described above in Item 4, Oath Planning may exercise discretionary authority provided by a client to select an independent third-party investment manager for the management of portfolios of individual fixed income securities. Oath Planning selects Focus Partners Advisor Solutions, LLC for such fixed income management. Oath Planning also contracts with Focus Partners Advisor Solutions, LLC for back-office services and assistance with portfolio modeling. Oath Planning has a fiduciary duty to select qualified and appropriate managers in the client's best interest, and believes that Focus Partners Advisor Solutions, LLC effectively provides both the back-office services that assist with its overall investment advisory practice and fixed income portfolio management services. The management of Oath Planning continuously makes this assessment. While Oath Planning has a contract with Focus Partners Advisor Solutions, LLC governing a time period for back-office services, Oath Planning has no such fixed commitment to the selection of Focus Partners Advisor Solutions, LLC for fixed income management services and may select another investment manager for clients upon reasonable notice to Focus Partners Advisor Solutions, LLC .

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Oath Planning has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. Oath Planning's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth Oath Planning's practice of supervising the personal securities transactions of employees with access to client information. Individuals associated with Oath Planning may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of Oath Planning that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, Oath Planning requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's principal. Oath Planning also requires such access persons to receive approval from the Chief Compliance Officer prior to

investing in any IPO's or private placements (limited offerings).

Oath Planning's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information and protecting the confidentiality of client information. Oath Planning requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

Oath Planning will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

Principal transactions are generally defined as transactions where an advisor, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated private fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment advisor in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, 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 advisor is dually registered as a broker-dealer or has an affiliated broker-dealer. It is Oath Planning's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. For clients that retain Focus Partners Advisor Solutions, LLC for sub-advisory fixed income management, please note that Focus Partners Advisor Solutions, LLC may engage in cross transactions of fixed income securities pursuant to their ADV disclosure. Clients should refer to Focus Partners Advisor Solutions, LLC Form ADV Part 2 for full disclosure of Focus Partners Advisor Solutions, LLC 's trading practices, including their determination of when fixed income cross trades may be advantageous for clients. Oath Planning will not cross trades between client accounts. Oath Planning continually monitors all trading in client accounts, including fixed income transactions performed by the sub-advisor.

Item 12 – Brokerage Practices

Investment Management Services:

Oath Planning may arrange for the execution of securities transactions with the assistance of Focus Partners Advisor Solutions, LLC . Through Focus Partners Advisor Solutions, LLC, Oath Planning participates in the Schwab Institutional (SI) services program offered to independent investment advisers by Charles Schwab & Company, Inc., and the Fidelity Institutional Wealth Services (FIWS) program, sponsored by Fidelity Brokerage Services, LLC ("Fidelity"). Schwab, and Fidelity are FINRA broker dealers and members of SIPC. Oath Planning may also utilize Enterprise Bank and Trust for some client's fixed income accounts.

For the benefit of no commissions or transaction fees, fully digital account opening, a large variety of security options and complete integration with software tools, Oath Planning may recommend Altruist Financial LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to Apex Clearing Corporation, an unaffiliated SEC registered broker dealer and FINRA/SIPC member, as the clients' custodian. Oath Planning does not receive any research or other soft-dollar benefit by nature from its relationship with Altruist Financial LLC. Additionally, Oath Planning does not receive any referrals in exchange for using Altruist Financial LLC as a broker dealer.

The Schwab, Fidelity, and Altruist brokerage programs will generally be recommended to advisory clients for the execution of mutual fund, ETF, and equity securities transactions. Oath Planning regularly reviews these programs to ensure that its recommendations are consistent with its fiduciary duty. These trading platforms are essential to Oath Planning's service arrangements and capabilities, and Oath Planning may not accept clients who direct the use of other brokers. As part of the Schwab and Fidelity programs, Oath Planning receives benefits that it would not receive if it did not offer investment advice (See the disclosure under Item 14 of this Brochure).

As Oath Planning will not request the discretionary authority to determine the broker dealer to be used or the commission rates to be paid in these situations, clients must direct Oath Planning as to the custodian to be used. In directing the use of a particular broker or dealer, it should be understood that Oath Planning will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. Not all investment advisers require clients to direct the use of specific brokers.

Oath Planning will not exercise authority to arrange client transactions in fixed income securities. Clients may provide this authority to a fixed income manager, Focus Partners, retained by Oath Planning on client's behalf by designating the portfolio manager with trading authority over client's brokerage account. Clients will be provided with the Disclosure Brochure (Form ADV Part 2) of the portfolio manager.

While Oath Planning does participate in soft dollar arrangements, we do not utilize brokerage commissions to pay for research and brokerage expenses.

SI and FIWS do not generally charge clients a custody fee and are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through the broker or that settle into the clients' accounts at the brokers. Trading client accounts through other brokers may result in fees (including mark-ups and mark-downs) being charged by the custodial broker and an additional broker. While Oath Planning will not arrange transactions through other brokers, the authority of the fixed income portfolio manager includes the ability to trade client fixed income assets through other brokers.

Oath Planning also does not have any arrangements to compensate any broker dealer for client referrals.

When trading client accounts, errors may periodically occur. Oath Planning does not maintain any client trade error gains. Oath Planning makes client whole with respect to any trade error losses incurred by client and caused by Oath Planning.

Oath Planning does not aggregate any client transactions in mutual fund or other securities. Client accounts are individually reviewed and managed, and transaction costs are not saved by aggregating orders in almost all circumstances in which Oath Planning arranges transactions. Focus Partners Advisor Solutions, LLC , in the management of fixed income portfolios, will aggregate certain transactions among client accounts that it manages, in which case an Oath Planning client's orders may be aggregated with an order for another client of Focus Partners Advisor Solutions, LLC who is not an Oath Planning client. *See Focus Partners Advisor Solutions, LLC Form ADV Part 2 for further information on their practices related to aggregation of fixed income trades.*

Broker Selection:

Oath Planning, due to the nature of its business and client needs, does not include blocking trades, negotiating commissions with broker dealers or obtaining volume discounts, nor necessarily obtaining the best price. Clients will be required to select their own broker dealers and insurance companies for implementation of any recommendations. Oath Planning may recommend any one of several brokers. Oath Planning clients must independently evaluate these brokers before opening an account. The factors considered by Oath Planning when making this recommendation are the broker's ability to provide professional services, Oath Planning's experience with the broker, the broker's reputation, and the broker's financial strength, among other factors. Oath Planning's clients may use any broker or dealer of their choice.

Item 13 – Review of Accounts

Reviews:

Investment Management Services

Account assets are supervised continuously and reviewed periodically by Oath Planning's advisers. The review process contains each of the following elements:

a. assessing client goals and objectives;
b. evaluating the employed strategy(ies);
c. monitoring the portfolio(s);
d. addressing the need to rebalance;
e. addressing tax considerations.

Additional account reviews may be triggered by any of the following events:

a. a specific client request;
b. a change in client goals and objectives;
c. an imbalance in a portfolio asset allocation; and
d. market/economic conditions.

For fixed income portfolios, certain account review responsibilities are delegated to a third-party investment manager as described above in Item 4.

Reports:

All clients will receive quarterly performance reports, prepared by Focus Partners Advisor Solutions, LLC and reviewed by Oath Planning, that summarize the client's account and asset allocation. Clients will also receive at least quarterly statements from their account custodian which will outline the client's current positions, and current market value.

Item 14 – Client Referrals and Other Compensation

Other Compensation:

As indicated under the disclosure for Item 12, SI, and FIWS each respectively provide Oath

Planning with access to services that are not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis at no charge to them.

These services benefit Oath Planning but may not benefit its clients' accounts. Many of the products and services assist Oath Planning in managing and administering clients' accounts. 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 client accounts), provide research, pricing information and other market data, facilitate payment of Oath Planning's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Oath Planning's accounts. Recommended brokers also make available to Oath Planning other services intended to help Oath Planning manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. Oath Planning does not, however, enter into any commitments with the brokers for transaction levels in exchange for any services or products from brokers. While as a fiduciary, Oath Planning endeavors to act in its clients' best interests, Oath Planning's requirement that clients maintain their assets in accounts at Schwab, or FIWS may be based in part on the benefit to Oath Planning of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the brokers, which may create a potential conflict of interest.

Client Referrals:

Oath Planning will not compensate, either directly or indirectly, any person (defined as a natural person or a company), for client referrals.

Item 15 – Custody

Firm does not accept or maintain physical custody of any client funds or securities. Oath Planning does maintain constructive custody due to direct deduction of advisory fees. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Oath Planning urges you to carefully review such statements and compare such official custodial records to the invoices and reports that we may provide to you and promptly notify us of any discrepancies. Our invoices and reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Oath Planning requests, via the investment advisory agreement, that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Any limitations on this discretionary authority shall be provided in writing.

When selecting securities and determining amounts, Oath Planning observes the investment policy

statement, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Oath Planning in writing.

For fixed income securities, this authority will include the discretion to retain a sub-advisor for fixed income accounts exceeding $400,000.

Item 17 – Voting Client Securities

Proxy Voting: As a matter of firm policy and practice, Oath Planning does not accept the authority to and does not vote proxies on behalf of advisory client. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive applicable proxies directly from the issuer of securities held in clients' investment portfolios and should direct any questions to them.

Class Actions, Bankruptcies and Other Legal Proceedings: Clients should note that Oath Planning will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held or previously were held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct Oath Planning to transmit copies of class action notices to the client or a third party. Upon such direction, Oath Planning will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Oath Planning's financial condition. Oath Planning 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.