



**1333 Heights Blvd, Suite 101**  
**Houston, TX 77008**  
**(832) 304-0712**  
**March 31, 2022**

This Brochure provides information about the qualifications and business practices of Olive Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (832) 304-0712 or via email at [kro@olivewm.com](mailto:kro@olivewm.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Olive Wealth Management, LLC (“OWM”) is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Additional information about OWM is also available via the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a CRD number. The CRD number for OWM is 284132. The SEC’s web site also provides information about any persons affiliated with OWM who are registered, or are required to be registered, as Investment Adviser Representatives of OWM.

## Item 2 – Material Changes

---

As of March 31, 2022, Olive Wealth Management, LLC, has the following material changes:

We provide an additional service for accounts held away from our Custodian. For those accounts where we have discretion, we will leverage an Order Management System to implement tax-efficient asset location and opportunistic rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, HSAs, 529s, and other assets held away from our Custodian. We regularly review the available investment options in these accounts, monitor them, rebalance and implement our strategies in the same way we do other accounts, though using different tools as necessary. These held away accounts are subject to additional fees and expenses assessed by the custodian and associated parties, such as administrative fees, record keeper fees, and investment advisory fees, not included in the annual fee charged by OWM.

We will ensure that you receive a summary of any additional material changes to this and subsequent Brochures within 90 days of the close of our business' fiscal year end, which is December 31st. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, our Brochure may be requested at any time, without charge, by contacting Jared Tobin at (832) 304-0712.

## Item 3 – Table of Contents

---

Item 1 – Cover Page .....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents .....	3
Item 4 – Advisory Business Introduction .....	4
Item 5 – Fees and Compensation .....	6
Item 6 – Performance Based Fee and Side by Side Management.....	9
Item 7 – Types of Client(s) .....	9
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	9
Item 9 – Disciplinary Information .....	13
Item 10 – Other Financial Industry Activities and Affiliations.....	13
Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading.....	13
Item 12 – Brokerage Practices .....	15
Item 13 – Review of Accounts.....	16
Item 14 – Client Referrals and Other Compensation.....	16
Item 15 – Custody .....	17
Item 16 – Investment Discretion.....	17
Item 17 – Voting Client Securities .....	17
Item 18 – Financial Information .....	18
Item 19 – Requirements for State Registered Advisers.....	18
ADV Part 2B Brochure Supplement – Klinton Ray Olive.....	19

## Item 4 – Advisory Business Introduction

---

### Our Advisory Business

Olive Wealth Management, LLC (“OWM”, “us”, “we”, “our”) is a Registered Investment Adviser (“Adviser”) which offers investment advice regarding securities products to clients.

We provide investment advice through Investment Adviser Representatives (“IAR”) associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf.

OWM was founded in 2016 by Klinton R. Olive who serves as Managing Member and Chief Compliance Officer. We provide management services to individuals, high net worth individuals, small businesses, trusts and estates, non-qualified retirement plans (such as IRAs), qualified retirement plans (such as pension and company 401(k) plans), institutional clients and other business entities. Our minimum account opening balance is \$500,000 which may be negotiable based upon certain circumstances.

We are committed to the precept that by placing the client’s interests first, we will add value to the asset management process and earn the client’s trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

### Services

We provide portfolio management services on a discretionary, and on a non-discretionary basis in limited circumstances. Our focus is on helping you develop portfolios that are designed to build and preserve your wealth.

Our investment strategy and portfolio management is appropriate for part or all of a Client's assets. We build highly diversified, global asset class portfolios, periodically rebalanced, with a specific focus on tax efficiency and minimizing costs associated with implementing and ongoing management of the portfolio. These portfolios are customized for each Client based on their goals, personal situation, investment time horizon, as well as their tolerance for risk (need, ability, and desire to take risk).

Held Away Account Services: We provide an additional service for accounts not under our Investment Management Service where it is not possible for us to enact trades through the normal custodian, but rather through a third-party software platform. These are primarily 401(k) accounts, 529 plans, and variable annuities. We meet with clients regularly to review the current holdings in these accounts, suggest and place appropriate trades, monitor the accounts, and provide statements and performance reporting on an ongoing basis.

We do not participate in wrap fee programs.

### Asset Management

Asset management is the professional management of securities (stocks, bonds and other securities) and assets (e.g., real estate) in order to meet your specified investment goals. With an Asset Management Account, you engage us to assist you in developing a custom-tailored portfolio designed to meet your unique investment objectives. The investments in the portfolio account may include mutual funds, exchange-traded funds, stocks, bonds, equity options, futures, etc.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income

and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us, we will analyze your situation and recommend an appropriate asset allocation or investment strategy. We will monitor the account, trade as necessary, and communicate regularly with you. Your circumstances shall be reported through quarterly statements and annual account reviews. These reviews will be conducted in person, by telephone conference, email and/or via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

We will:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, periodic rate of return reports, asset allocation statement, rebalanced statements as needed
- Advise on asset selection
- Determine market divisions through asset allocation models
- Provide research and information on performance and fund management changes
- Build a risk management profile for you
- Assist you in setting and monitoring goals and objectives
- Provide personal consultations as necessary upon your request or as needed.

You are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not indicative of future results.

Upon engaging our services, we will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. We recommend using TD Ameritrade; however, you may use any custodian you wish.

For those accounts being managed on a discretionary basis, you will enter into a separate custodial agreement with the custodian which authorizes the custodian to take instructions from us regarding all investment decisions for your account. We will select the securities bought and sold and the amount to be bought and sold, within the parameters of the objectives and risk tolerance of your account. You will be notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These

statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

We may also provide you with access to a quarterly performance statement starting at the end of the first full calendar quarter after signing the Advisory Agreement. These statements give you additional feedback regarding performance, educate you about our investment philosophy, and describe any changes in current strategy and allocation along with the reasons for making these changes.

Generally, we manage assets on a discretionary basis, which means you have given us the authority to determine the following with/without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account
- Broker-dealer to be used for a purchase or sale of securities for your account
- Commission rates to be paid to a broker or dealer for your securities transaction.

If you have not given us the authority to manage your account on a discretionary basis, then we cannot trade in your account without your express permission. Typically, management of accounts on a non-discretionary basis is reserved for those accounts held away from TD Ameritrade, consisting of non-traditional securities products or other non-securities products (variable annuities, CD's, etc.).

Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will pay special attention to tax consequences, and may deviate from our strategy to avoid adverse tax consequences, while working with your tax professionals to assist you with tax planning.

We are generally available during normal business hours, either by telephone, email or in person by appointment to answer your questions. However, in some cases Mr. Olive may be away from his phone and or office while on client meetings, on vacation, etc. If at any time you have a question but are not able to immediately reach a representative of the Adviser, leave a message or send an email and someone will attempt to contact you within 24 hours.

## **Assets Under Management**

As of December 31<sup>st</sup>, 2021, total assets under management were \$47,633,930.

## **Item 5 – Fees and Compensation**

---

We provide asset management services for a fee. The Client can terminate the relationship without penalty within the first five (5) days after the signing of this agreement. After the initial five days, the executed

Agreement will continue in effect until terminated by either party with a written notice to the other, in person, email or by mail to the address of record. If the account(s) is closed after the five day, no penalty period, any prepaid fees that are in excess of the services performed will be promptly refunded to you. Any fees that are due, but have not been paid, may be billed to you and are due immediately.

### **Asset Management Fee Schedule**

As stated earlier, our minimum account opening balance is \$500,000. However, the Adviser may negotiate the minimum account opening balance at its discretion based on certain circumstances. In those cases, clients with starting balances less than \$500,000 may pay a flat fee of 1.25%. Fees are charged quarterly, in advance. Fee amounts are calculated using the ending balance of the account(s) under management for the preceding quarter.

For those meeting the minimum account opening balance, the fee charged is based upon the amount of money you invest. Multiple accounts of immediately-related family members, may be considered one consolidated account for billing purposes. Fees are charged quarterly, in advance. Fee amounts are calculated using the ending balance of the account(s) under management for the preceding quarter, pursuant to the following fee schedule:

#### **Fee Schedule**

Asset Breakpoints	Annual Fee
First \$2,000,000	1.00%
Next \$3,000,000	0.85%
Next \$5,000,000	0.40%
Above \$10,000,000	0.30%

The fees shown above are annual fees and may be negotiable based upon certain circumstances. No increase in the annual fee shall be effective without prior written notification to you. We believe our advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

In addition to the Adviser's annual investment management fee, the Client shall also incur, relative to all mutual fund purchases, charges imposed at the mutual fund level (i.e. advisory fees and other fund expenses), transaction and administrative fees. The Client acknowledges that trading costs will be assessed to the Client according to the agreements made with the Custodian(s) and other third parties as applicable.

Held Away Account Services: The Client acknowledges and agrees that the Adviser may charge the Custodian account for certain additional Assets managed for the Client by the Adviser, but not held by the Custodian (i.e. 529 plans, 401(k), variable annuities, mutual funds, and variable life). We charge an annual fee for services provided to these held away accounts, which is deducted from a non-IRA account under our Investment Management Service on a quarterly basis, in advance. Fees are based on the assets within these accounts and are charged the same rate as the client's Asset Management Agreement fee schedule annually according to the valuation of the accounts at the close of the quarter as valued by the account custodian. These held away accounts are subject to additional fees and expenses assessed by the custodian and associated parties, such as administrative fees, record keeper fees, and investment advisory fees, not included in the annual fee charged by OWM.

No portion of the Adviser compensation shall be based on capital gains or capital appreciation of the Assets except as provided for under the Investment Advisors Act of 1940. OWM does not charge performance-based fees.

### **Qualified Retirement Plans Consulting Fees**

Advisor will provide the services listed in this Agreement based on the schedules below. Ongoing asset-based fees are calculated based on a percentage of Plan assets under management and billed quarterly in advance. The quarter-end Plan assets under management are defined as plan assets on the last trading day of the quarter. The following fee schedule applies for qualified retirement plan consulting services:

401(k) Plan Assets	Program Fees
\$0.00 to \$999,999.99	0.70%
\$1,000,000.00 to \$2,999,999.99	0.50%
\$3,000,000.00 to \$4,999,999.99	0.40%
\$5,000,000.00 to \$1,000,000,000.00	0.30%

The fees shown above are annual fees and may be negotiable based upon certain circumstances. No increase in the annual fee shall be effective without prior written notification to you. We believe our advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

### **Third Party Fees**

Our fees do not include brokerage commissions, transaction fees, Administrative Service Fees and other related costs and expenses. You may incur certain charges imposed by custodians, mutual fund companies and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Certain strategies offered by us may involve investment in mutual funds and/or ETFs. Load and no load mutual funds may pay annual distribution charges, sometimes referred to as "12(b)(1) fees". These 12(b)(1) fees come from fund assets, and thus indirectly from clients' assets. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge. Our brokerage practices are discussed in more detail under Item 12 – Brokerage Practices.

### **Other Compensation**

Neither OWM nor Mr. Olive receive any compensation other than fees charged for investment advisory services.



## **Item 6 – Performance Based Fee and Side by Side Management**

---

We do not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7 – Types of Client(s)**

---

We provide portfolio management services to individuals, high net worth individuals, small businesses, trusts and estates, non-qualified retirement plans (such as IRAs), qualified retirement plans (such as pension plans and company 401(k) plans), institutional clients and other business entities.

Our minimum account opening balance is \$500,000 which may be negotiable based upon certain circumstances.

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

---

### **Methods of Analysis**

We mainly use modern portfolio theory and fundamental analysis/ Efficient Market Hypothesis as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

#### **Fundamental Analysis**

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

#### **Modern Portfolio Theory (MPT)**

We use Modern Portfolio Theory to help select the funds we use in your account.

Modern portfolio theory tries to understand the market as a whole, rather than looking for what makes each investment opportunity unique. Investments are described statistically, in terms of their expected long-term return rate and their expected short-term volatility. The volatility is equated with "risk," measuring how much worse than average an investment's bad years are likely to be. The end goal is to identify your acceptable level of risk tolerance, and then to find a portfolio with the maximum expected return for that level of risk.

### **Investment Strategies**

In order to perform this analysis, we use many resources, such as:

- Morningstar

- Financial newspapers, blogs, and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings
- Global Market Capitalizations
- Dimensional Fund Advisors “Returns Web”, “Fund Center,” and “Model Center” software.

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year
- Short term purchases - securities sold within a year
- Trading -securities sold within 30 days

### **Risk of Loss**

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

### ***Fundamental Analysis Risk***

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- The data used may be out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.

### ***Modern Portfolio Theory (MPT) Risk***

Modern Portfolio Theory tries to understand the market as a whole and measure market risk in an attempt to reduce the inherent risks of investing in the market. However, with every financial investment strategy there is a risk of a loss of principal. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

A list of all risks associated with the strategies, products and methodology we offer are listed below:

### ***Alternative Investment Risk***

Investing in alternative investments is speculative, not suitable for all clients, and intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include:

- Loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices
- Lack of liquidity in that there may be no secondary market for the fund and none expected to develop
- Volatility of returns
- Absence of information regarding valuations and pricing
- Delays in tax reporting
- Less regulation and higher fees than mutual funds.

### ***Bond Fund Risk***

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

### ***Exchange Traded Fund (“ETF”) Risk***

Most ETFs are passively managed investment companies whose shares are purchased and sold on a securities exchange. An ETF represents a portfolio of securities designed to track a particular market segment or index. ETFs are subject to the following risks that do not apply to conventional funds:

- The market price of the ETF's shares may trade at a premium or a discount to their net asset value;
- An active trading market for an ETF's shares may not develop or be maintained; and
- There is no assurance that the requirements of the exchange necessary to maintain the listing of an ETF will continue to be met or remain unchanged

### ***Mutual Funds Risk***

The following is a list of some general risks associated with investing in mutual funds.

- Country Risk - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- Currency Risk -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- Income Risk - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- Industry Risk - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- Inflation Risk - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- Manager Risk -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- Market Risk -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- Principal Risk -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

### ***Stock Fund Risk***

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

### ***Overall Risks***

Clients need to remember that past performance is no guarantee of future results. All investments carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.

Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.

While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

## 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 us or the integrity of our management. We do not have any information to disclose concerning OWM or any of our IARs. We adhere to high ethical standards for all IARs and associates.

## Item 10 – Other Financial Industry Activities and Affiliations

---

Neither OWM nor any of its management persons are registered as a broker-dealer or registered as a representative of a broker-dealer, a commodity pool operator, futures commission merchant, and/or commodity trading advisor nor does it have any pending application to register. In addition, neither OWM nor its management persons are affiliated with any broker-dealer.

### Other Financial Industry Affiliations

The IARs of OWM do not participate in other business activities or have any outside affiliations at this time.

## Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

---

### General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

### Participation or Interest in Client Accounts

Our Compliance policies and procedures prohibit anyone associated with OWM from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the CCO.

## **Personal Trading**

We may recommend securities to you that we will purchase for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. 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.

OWM has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons". The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects; provided, however that at any time that the Adviser has only one Access Person, he or she shall not be required to submit any securities report described above.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IARs of OWM, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

## **Privacy Statement**

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

## **Conflicts of Interest**

OWM's IARs may employ the same strategy for their personal investment accounts as it does for its clients. However, IARs may not place their orders in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

## Item 12 – Brokerage Practices

---

### Factors Used to Select Custodians

In recommending a custodian/broker-dealer, we look for a company that offers relatively low transaction fees, access to desired securities, trading platforms, and support services. We recommend clients use TD Ameritrade as the qualified custodian for their accounts when utilizing our asset management services.

### Soft Dollars

TD Ameritrade or other third party custodian/broker dealers may provide us with certain brokerage and research products and services that qualify as "brokerage or research services" under the rules. These research products and/or services will assist the IAR in its investment decision making process. Such research generally will be used to service all of the IAR's clients, but brokerage commissions paid by the client may be used to pay for research that is not used in managing the client's account. The account may pay to a broker-dealer a commission greater than another qualified broker-dealer might charge to effect the same transaction where the IAR determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

Because soft dollar benefits could be considered to provide a benefit to the adviser that might cause the client to pay more than the lowest available commission without receiving the most benefit, they are considered a conflict of interest in recommending or directing custodial and third party managerial services. OWM mitigates these conflicts of interest through strong oversight of soft-dollar arrangements by the Chief Compliance Officer, in order to assure the soft dollar benefits serve the best interests of the client.

There may other benefits from recommending TD Ameritrade or other third party managers such as software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Other services may include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom OWM may contract directly. OWM may receive seminar expense reimbursements from product sponsors which may be based on the sales of products to their clients.

Soft dollar benefits may be proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

### Best Execution

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

## **Brokerage for Client Referrals**

In selecting and/or recommending broker-dealers, we do not take into consideration whether or not we will receive client referrals from the broker-dealer or third party.

## **Directed Brokerage**

Under certain circumstances Clients are permitted to use the custodian of their choosing. Not all advisory firms permit you to direct brokerage. If you elect to select your own broker-dealer or custodian and direct us to use them, you may pay higher or lower fees than what is available through our relationships. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer or custodian for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction. In all instances, we will seek best execution for you.

## **Trading**

Transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or “batch” such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients’ differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

## **Item 13 – Review of Accounts**

---

### **Reviews**

Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections, etc. on an ongoing basis. However, formal reviews are conducted at least annually or as agreed to by the Client and Adviser. Reviews will be conducted by our Chief Compliance Officer and Managing Member, Klinton Olive. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place.

### **Reports**

You will be provided with account statements reflecting the transactions occurring in the account on at least a quarterly basis. These statements will be written or electronic depending upon what you selected when you opened the account. You will be provided with paper confirmations for each securities transaction executed in the account. You are obligated to notify us of any discrepancies in the account(s) or any concerns you have about the account(s).

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

---

We do not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients nor do we directly or indirectly pay any compensation to another person if they refer clients to us.



## Item 15 – Custody

---

We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your account(s) if we have the ability to deduct your advisory fees from the custodian. We use TD Ameritrade as the custodian and/or broker-dealer for all your accounts. You should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains your investment assets. We urge you to carefully review such statements and compare this official custodial record to the performance reports that we may provide to you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact Mr. Olive.

We do not debit the client fees directly from your advisory account. We send information to your custodian to debit your fees and to pay them to us. As part of the new account opening process you will authorize the custodian to pay us directly at the onset of the relationship.

## Item 16 – Investment Discretion

---

We usually receive discretionary authority from you at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. This information is described in the Advisory Agreement you sign with us. In all cases, however, this discretion is exercised in a manner consistent with your stated investment objectives for your account.

When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions you have set. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Prior to assuming discretionary authority, clients must execute the Advisory Agreement. Execution of the Advisory Agreement grants us the authority to determine, without obtaining specific client consent, both the amount and the type of securities to be bought and sold to help achieve the client account objectives.

As stated earlier, under certain circumstances we may manage client's account(s) on a non-discretionary basis. Under these circumstances we do not receive discretionary authority from you to select the type of securities and amount of securities to be bought or sold.

## Item 17 – Voting Client Securities

---

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets.

## **Item 18 – Financial Information**

---

We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

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

---

### **Principals**

There is one principal of OWM, Klinton Olive. He is the Chief Compliance Officer and Manager and was born in 1980. His education information, business background, and other business activities can be found in the Form ADV Part 2B Brochure Supplement below.

### **Performance Fees**

We do not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our normal asset management accounts.

### **Disclosable Events**

Neither OWM nor Mr. Olive have any reportable events to disclose here.

### **Other Relationships**

Neither OWM nor Mr. Olive has any relationship with any issuer of securities.

## **ADV Part 2B Brochure Supplement – Klinton Ray Olive**

### **Item 1 – Cover Page**

**Klinton “Klint” Ray Olive**

**CRD # 5231147**

**Olive Wealth Management, LLC**

**1333 Heights Blvd, Suite 101**

**Houston, TX 77008**

**(832) 304-0712**

**March 31, 2022**

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

Additional information about Mr. Olive, CRD# 5231147 is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Educational Background and Business Experience**

Full Legal Name: Klinton Ray Olive

Year of Birth: 1980

### **Education**

Bachelor of Science/Personal Financial Planning                      2005  
Texas Tech University, Lubbock, TX

### **Business History**

May 2016 – Present	CCO and Managing Member at OWM
Mar 2009 – August 2016	IAR & Chief Investment Officer at Champion Advisors LLC
Jun 2008 – Oct 2013	Registered Representative at Triad Advisors
Jun 2006 – Feb 2009	Private Client Services and Investment Adviser Representative at Capital Management Advisors

## **Item 3 – Disciplinary History**

Neither OWM nor Mr. Olive has any disciplinary history to disclose.

## **Item 4 – Other Business Activities**

Mr. Olive is not involved in any other business activities.

## **Item 5 – Additional Compensation**

Mr. Olive does not receive any other compensation.

## **Item 6 – Supervision**

Klint Olive is the CCO and performs all supervisory duties for his firm.

## **Item 7 – Requirements for State-Registered Advisers**

Mr. Olive has no reportable events to disclose here.