

# FORM ADV PART A DISCLOSURE BROCHURE

PREPARED IN COMPLIANCE WITH  
THE INVESTMENT ADVISERS ACT OF 1940 RULE 04-3 (A)



**Diamond**

*Wealth Management, LLC*

**Office Address:**

40 W Main St. Court  
Suite 50E  
Alpine, UT 84004

Tel: 801-216-4811

[dave@diamondwealthmgt.com](mailto:dave@diamondwealthmgt.com)

[www.Diamondwealthmgt.com](http://www.Diamondwealthmgt.com)

This brochure provides information about the qualifications and business practices of Diamond Wealth Management, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 801-216-4811. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Diamond Wealth Management, LLC (CRD #288603) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**APRIL 30th, 2024**

## **Item 2: Material Changes**

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

### **Material Changes since the Last Update**

This update is in accordance with the required annual update for Investment Advisors.

Since the last filing of this brochure on March 5, 022, the following has been updated:

- Item 7 has been updated to add in an opening account minimum of \$250,000.

### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

# Item 3: Table of Contents

<b>Item 1: Cover Page.....</b>	<b>1</b>
<b>Item 2: Material Changes.....</b>	<b>2</b>
Annual Update .....	2
Material Changes since the Last Update.....	2
Full Brochure Available.....	2
<b>Item 3: Table of Contents .....</b>	<b>3</b>
<b>Item 4: Advisory Business.....</b>	<b>5</b>
Firm Description.....	5
Types of Advisory Services .....	5
Client Tailored Services and Client Imposed Restrictions.....	6
Wrap Fee Programs .....	6
Client Assets Under Management.....	6
<b>Item 5: Fees and Compensation .....</b>	<b>6</b>
Method of Compensation and Fee Schedule .....	6
Client Payment of Fees .....	7
Additional Client Fees Charged.....	7
Prepayment of Client Fees.....	7
External Compensation for the Sale of Securities to Clients.....	7
<b>Item 6: Performance-Based Fees and Side-by-Side Management.....</b>	<b>8</b>
Sharing of Capital Gains .....	8
<b>Item 7: Types of Clients.....</b>	<b>8</b>
Description .....	8
Account Minimums.....	8
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>8</b>
Methods of Analysis .....	8
Investment Strategy.....	8
Security Specific Material Risks.....	9
<b>Item 9: Disciplinary Information .....</b>	<b>10</b>
Criminal or Civil Actions.....	10
Administrative Enforcement Proceedings.....	10
Self-Regulatory Organization Enforcement Proceedings.....	10
<b>Item 10: Other Financial Industry Activities and Affiliations .....</b>	<b>11</b>
Broker-Dealer or Representative Registration.....	11
Futures or Commodity Registration.....	11
Material Relationships Maintained by this Advisory Business and Conflicts of Interest .....	11
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest .....	11
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>12</b>
Code of Ethics Description.....	12
Investment Recommendations Involving a Material Financial Interest and Conflict	

of Interest.....	12
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest.....	12
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest.....	13
<b>Item 12: Brokerage Practices.....</b>	<b>13</b>
Factors Used to Select Broker-Dealers for Client Transactions.....	13
Aggregating Securities Transactions for Client Accounts.....	14
<b>Item 13: Review of Accounts .....</b>	<b>14</b>
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory .....	14
Persons Involved .....	14
Review of Client Accounts on Non-Periodic Basis .....	14
Content of Client Provided Reports and Frequency.....	14
<b>Item 14: Client Referrals and Other Compensation.....</b>	<b>15</b>
Economic Benefits Provided to the Advisory Firm from External Sources and.....	15
Conflicts of Interest.....	15
Advisory Firm Payments for Client Referrals.....	15
<b>Item 15: Custody.....</b>	<b>15</b>
Account Statements .....	15
<b>Item 16: Investment Discretion.....</b>	<b>16</b>
Discretionary Authority for Trading.....	16
<b>Item 17: Voting Client Securities.....</b>	<b>16</b>
Proxy Votes.....	16
<b>Item 18: Financial Information .....</b>	<b>16</b>
Balance Sheet .....	16
Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients .....	16
Bankruptcy Petitions during the Past Ten Years.....	17
Item 2 Educational Background and Business Experience .....	19
Item 3 Disciplinary Information.....	19
Item 4 Other Business Activities .....	19
Item 5 Additional Compensation .....	19
Item 6 Supervision.....	20

# Item 4: Advisory Business

## Firm Description

Diamond Wealth Management, LLC ("DWM") was founded in 2017 with David Hill as 100% owner and Chief Compliance Officer.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. Conflicts of interest will be disclosed to the client in the event they should occur.

## Types of Advisory Services

### ASSET MANAGEMENT

DWM offers discretionary direct asset management services to advisory clients. DWM will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, assets allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize DWM discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When deemed appropriate for the client, DWM may hire sub-advisors to manage all or a portion of the assets in the client account. DWM has full discretion to hire and fire sub-advisors as they deem suitable. Sub-advisors will maintain the models or investment strategies agreed upon between Sub-advisor and DWM. Sub-advisors execute all trades on behalf of DWM in client accounts. DWM will be responsible for the overall direct relationship with the client. DWM retains the authority to terminate the Sub-advisor relationship at DWM's discretion.

### FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate DWM on a negotiable fixed fee or hourly fee basis described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, Qualified Plans, Retirement Income; Social Security, College Planning and Insurance. If a conflict of interest exists between the interests of the investment advisor and the interests of the client, the client is under no obligation to act upon the investment advisor's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through DWM. Financial plans will be completed and delivered inside of six (6) months. Clients may terminate advisory services

with thirty (30) days written notice.

## **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

## **Wrap Fee Programs**

DWM does not sponsor any wrap fee programs.

## **Client Assets Under Management**

As of December 31, 023, DWM had approximately \$138,224,377 in client assets under management on a discretionary basis and \$15,475,797 in assets under management on a non-discretionary basis.

# **Item 5: Fees and Compensation**

## **Method of Compensation and Fee Schedule**

### ASSET MANAGEMENT

DWM offers discretionary direct asset management services to advisory clients. Fees for these services will be based on a percentage of Assets Under Management not to exceed % annualized.

The annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last day of the previous quarter. The investment advisory fee will be billed directly to the Custodian. The Custodian will facilitate the to be deducted from the Account upon notification by Advisor, or shortly thereafter. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund and without obligation. After the initial five business days, Clients may terminate advisory services with thirty (30) days written notice. Client will be entitled to a pro rata refund for the days service was not provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

From time to time, DWM may also utilize the services of a sub-advisor to manage clients' investment portfolios. DWM will enter into sub-advisor agreements with other registered investment advisor firms. When using sub-advisors, the client will not pay additional fees. The sub-advisors fees are included in the fees charged by DWM.

### FINANCIAL PLANNING FEES

Financial planning services are billed on either an hourly or fixed/flat fee basis. Financial

Planning fees will be negotiated in advance and will be set-out in each client's Financial Planning Agreement.

Clients have the option to pay:

- 50% upon executing the agreement, with the balance due upon delivery of the plan.
- Upon delivery of the completed plan.

Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund and without obligation. For cancellations occurring after the initial five business days, Client will be entitled to a pro-rate refund, or DWM will be entitled to a pro-rate fee, based on the percentage of work completed.

#### HOURLY FEES

Hourly fees will be assessed at a rate of up to \$350 per hour, this fee will typically be charged for those clients requiring limited assistance with their financial planning needs.

#### FIXED FEES

For clients requiring a comprehensive financial plan, a maximum flat fee of \$10,000 will be charged.

DWM, at its discretion, may waive financial planning fees for clients who implement the plan with DWM.

## **Client Payment of Fees**

Investment management fees are billed quarterly, in advance, at the beginning of each calendar quarter, based on the preceding quarter-end account balance. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Financial Planning fee will be negotiated in advance and will be set-out in each client's advisory contract. Payment is due 50% upon execution of the agreement, with the balance due upon delivery of the plan.

## **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

DWM, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

## **Prepayment of Client Fees**

DWM does not require prepayment of fees of more than \$1200 per client and six months or more in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client.

## **External Compensation for the Sale of Securities to Clients**

DWM does not receive any external compensation for the sale of securities to clients, nor

do any of the investment advisor representatives of DWM.

# **Item 6: Performance-Based Fees and Side-by-Side Management**

## **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

DWM does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

# **Item 7: Types of Clients**

## **Description**

DWM generally provides investment advice to individuals, high net worth individuals, trusts, estates, or charitable organizations, corporations, or business entities.

Client relationships vary in scope and length of service.

## **Account Minimums**

DWM requires a minimum opening account balance of \$250,000. DWM reserves the right to accept or decline clients based on assets, at the firm's discretion.

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

## **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, and



cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

When creating a financial plan, DWM utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. The main sources of information include Morningstar, client documents such as tax returns and insurance policies.

In developing a financial plan for a client, DWM' analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

The main sources of information include Bank of America, Merrill Lynch, S&P, Fidelity, Argus, Chaikin Analytics, financial newspapers and magazines, research material prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission and company press releases.

## Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes a client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases and margin trading.

## Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk.

Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with DWM:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

- *Currency Risk*: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk*: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk*: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk*: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk*: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- *Long-term purchases*: Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases*: Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk - the risk that your investment's return will not keep up with inflation.
- *Trading risk*: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading*: The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership.
- *Trading on Margin*: In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a

margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.

## **Item 9: Disciplinary Information**

### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

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

### **Broker-Dealer or Representative Registration**

Neither DWM nor any of its employees are registered representatives of a broker-dealer.

### **Futures or Commodity Registration**

Neither DWM nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

David Hill and other representatives of DWM are also licensed as independent insurance agents for various insurance companies and products such as Medicare, life and health insurance. Approximately 1-10% of their time is spent in his/her insurance practice. From time to time, they will offer clients advice or products from those activities. Therefore, they will be able to purchase products for any client in need of such services.

These practices represent conflicts of interest because it gives them an incentive to recommend products based on the commission amount received. This conflict is mitigated

by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

## **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

From time to time, DWM may also utilize the services of a sub-advisor to manage clients' investment portfolios. Sub-advisors will maintain the models or investment strategies agreed upon between sub-advisor and DWM. Sub-advisors execute all trades on behalf of DWM in client accounts. DWM will be responsible for the overall direct relationship with the client. DWM retains the authority to terminate the sub-advisor relationship at DWM's discretion.

In addition to the authority granted to DWM under the Agreement, Client will grant DWM full discretionary authority and authorizes DWM to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client on Separately Managed Account and with prior written Client consent for Standard Account. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to DWM in the Agreement. In addition, at DWM's discretion, DWM may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors.

This practice represents a conflict of interest as DWM may select sub-advisors who charge a lower fee for their services than other sub-advisors. This conflict is mitigated by disclosures, procedures, and by the fact that DWM has a fiduciary duty to place the best interest of the client first and will adhere to their code of ethics.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **Code of Ethics Description**

The employees of DWM have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of DWM employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of DWM. The Code reflects DWM and its supervised persons' responsibility to act in the best interest of their client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use

internal research for their personal benefit in conflict with the benefit to our clients.

DWM policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of DWM may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

DWM' Code is based on the guiding principle that the interests of the client are our top priority. DWM' officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

DWM and its employees do not recommend to clients securities in which we have a material financial interest.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

DWM and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide DWM with copies of their brokerage statements.

The Chief Compliance Officer of DWM is David Hill. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees

does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

## **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

DWM does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide DWM with copies of their brokerage statements.

The Chief Compliance Officer of DWM is David Hill. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does

not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Broker-Dealers for Client Transactions**

DWM may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. DWM will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. DWM relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by DWM.

- *Directed Brokerage*

In circumstances where a client directs DWM to use a certain broker-dealer, DWM still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: DWM's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. DWM does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by DWM from or through a broker-dealer in exchange for directing client transactions to the broker-dealer. As permitted by Section 8(e) of the Securities Exchange Act of 1934, DWM receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of DWM. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when DWM receives soft dollars. This conflict is mitigated by disclosures, procedures, and by the fact that DWM has a fiduciary responsibility to act in the best interest of its clients and the services received are beneficial to all clients.

### **Aggregating Securities Transactions for Client Accounts**

DWM may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trades cannot be executed in full at the same price or time, the securities actually

purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts. For example, a partial fill will generally be filled pro-rata among participating accounts. Prior to entry of a block trade, a written pre-allocation will be generated which identifies the group of client accounts participating in the order.

Changes in allocation prior to final allocation may be made for good cause provided that all client accounts receive fair and equitable treatment. A written explanation of the reason for any material change in the allocation must be provided to and approved by the Compliance Officer no later than the morning following the execution of the trade. If the change in the allocation is the result of a condition that exists or a change in the client's account outside of the portfolio manager's control, then approval by the Compliance Officer is not required.

## **Item 13: Review of Accounts**

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory**

#### **Persons Involved**

Account reviews are performed quarterly by Investment Advisor Representatives of DWM. Account reviews are performed more frequently when market conditions dictate. Financial planning relationships with clients are monitored on an ongoing basis to ensure the recommendations made are within the scope of the plan remain suitable. The advisor will meet with the clients on at least an annual basis to secure updated information. These meetings may be in person or via phone.

#### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

#### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts.

Account statements are issued by the Advisor's custodian. Client receives confirmations of each transaction in account from Custodian in addition to their statements from the Custodian.

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

## **Economic Benefits Provided to the Advisory Firm from External Sources and**

### **Conflicts of Interest**

DWM does not receive any economic benefits from external sources.

### **Advisory Firm Payments for Client Referrals**

DWM may, from time to time, enter into agreements with individuals and organizations ("solicitors") that refer Clients to DWM in exchange for compensation. For all Clients introduced by a solicitor, DWM may pay that solicitor a fee pursuant to a previously executed agreement. While the specific terms of each agreement may differ, generally, the compensation will be based upon DWM's engagement of new Clients and is calculated using a fixed fee, or a varying percentage of the fees paid to DWM by such Clients. Any such fee shall be paid solely from DWM's investment management fee and shall not result in any additional charge to the Client. DWM ensures that solicitors are registered with all appropriate jurisdictions or exempt from registration as investment advisers or investment adviser representatives.

Each referred Client to DWM under such an arrangement will receive a copy of this brochure and a separate written disclosure document disclosing the nature of the relationship between the solicitor and DWM and the amount of compensation that will be paid by DWM to the solicitor. The solicitor is required to obtain the Client's signature acknowledging receipt of DWM's disclosure brochure and the solicitor's written disclosure statement.

## **Item 15: Custody**

### **Account Statements**

All assets are held by qualified custodians, which means the custodians provide account statements directly to clients via email, through the Custodian portal or at their address of record at least quarterly.

DWM is deemed to have constructive custody solely because advisory fees are directly deducted from client's account.

DWM is also deemed to have limited custody due to its Third-Party Standing Letters of Authorization ("SLOA").

DWM and its qualified custodian meet the following seven (7) conditions in order to avoid maintaining full custody and be subject to the surprise exam requirement:



1. The Client provides an instruction to the qualified custodian, in writing, that includes the Client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The Client authorizes DWM, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The Client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the Client's authorization and provides a transfer of funds notice to the Client promptly after each transfer.
4. The Client has the ability to terminate or change the instruction to the Client's qualified custodian.
5. DWM has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the Client's instruction.
6. DWM maintains records showing that the third party is not a related party nor located at the same address as DWM.
7. The Client's qualified custodian sends the Client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

## **Item 16: Investment Discretion**

### **Discretionary Authority for Trading**

DWM requires discretion over the selection and amount of securities to be bought or sold for their account (within the parameters established by their Advisory Agreement) without obtaining client consent or approval. However, these purchases may be subject to specified investment objectives and guidelines. For example, a Client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio.

Discretionary authority will only be authorized upon full disclosure to the client and by that client specifically authorizing said authority through the execution of an Investment Advisory Agreement. All discretionary trades made by DWM on behalf of their discretionary accounts (clients) will be in accordance with that client's investment objectives and goals.

## **Item 17: Voting Client Securities**

### **Proxy Votes**

DWM does not vote proxies on securities. Clients are expected to vote their own proxies.

The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, DWM will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

### **Balance Sheet**

A balance sheet is not required to be provided because DWM does not serve as a custodian for client funds or securities and DWM does not require prepayment of fees of more than \$1200 per client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

DWM has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

Neither DWM nor its management has had any bankruptcy petitions in the last ten years.

# SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

David B. Hill, CFP®



**Diamond**

*Wealth Management, LLC*

**Office Address:**

40 W Main St. Court  
Suite 50E  
Alpine, UT 84004

Tel: 801-216-4811

[dave@diamondwealthmgt.com](mailto:dave@diamondwealthmgt.com)

[www.Diamondwealthmgt.com](http://www.Diamondwealthmgt.com)

This brochure supplement provides information about David B. Hill and supplements the Diamond Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact David B. Hill if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about David B. Hill (CRD #4049028) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**April 30, 2024**

## Brochure Supplement (Part B of Form ADV)

### Supervised Person Brochure

#### Principal Executive Officer

David B. Hill, CFP®

- Year of birth: 1955

## Item 2 Educational Background and Business Experience

#### Educational Background:

- Boise State University; Bachelor of Business Administration, Accounting; 1979

#### Business Experience:

- Diamond Wealth Management, LLC; CCO/IAR; 05/2017-Present
- Silverhill Life, LLC; Member/Insurance Agent; 02/2018-Present
- Independent Insurance Agent; 03/2011-Present
- Capital Guardian, LLC; Registered Representative; 06/2014-05/2017
- Capital Guardian Wealth Management, LLC; IAR; 06/2012-05/2017
- Fortius Wealth Management LLC; IAR; 04/2012-06/2012
- Waddell & Reed, Inc.; IAR/Registered Representative; 03/2011-04/2012
- Bank of America, NA; Investment Associate; 03/2010-03/2011
- Merrill Lynch, Pierce, Fenner & Smith Incorporated; IAR/Registered Representative; 11/1999-03/2011

## Item 3 Disciplinary Information

*Criminal or Civil Action:* None to report.

*Administrative Proceeding:* None to report.

*Self-Regulatory Proceeding:* None to report.

## Item 4 Other Business Activities

David Hill has a financial industry affiliated business as an independent insurance agent and as an insurance agent with Silverhill Life, LLC. From time to time, he will offer clients advice or products from those activities. He may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives Mr. Hill an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

## Item 5 Additional Compensation

David Hill receives additional compensation in his capacity as an insurance agent, but he does not receive any performance-based fees.

## **Item 6 Supervision**

Since Mr. Hill is the Chief Compliance Officer of DWM he is ultimately responsible for all supervision and formulation and monitoring of investment advice offered to clients.

David Hill's contact information: PHONE: 801-216-4811 EMAIL: [dave@diamondwealthmgt.com](mailto:dave@diamondwealthmgt.com).