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Adviser Brochure

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This brochure provides information about the qualifications and business practices of Daviman Financial, LLC ("Adviser"). If you have any questions about the contents of this brochure, please contact us by telephone at: (317) 207-0175, or by email at: Invest@DavimanFinancial.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. The Adviser's registration as an Investment Adviser does not imply a certain level of skill or training.

Additional information about the Adviser is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

There have been no material changes since the March 22, 2024, Form ADV filing on the IARD system.

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Item 4: Advisory Business

Adviser Description

Daviman Financial, LLC (“Daviman,” or, the “Adviser”) is a Delaware limited liability company formed on August 9, 2016. Rone Davis is the sole owner of Daviman. Daviman is a fiduciary and is required to act in a client’s best interest at all times.

The primary types of investment advisory services offered by the Adviser are financial planning, investment management, retirement plan consulting, investment consulting, and a third party robo advisor program.

Financial Planning

The Adviser works to develop a comprehensive financial plan for every client. Daviman begins with an intensive fact-finding session which helps the Adviser become totally familiar with the client’s current financial situation (including among other things, income taxes, investments, insurance, estate affairs and family circumstances), as well as their personal goals and priorities for the next several years. Then, working from this comprehensive information, the Adviser prepares a detailed financial plan which documents the client’s situation, identifies all areas which will be impacted, and makes specific goal-oriented recommendations. The Adviser’s specific goal-oriented recommendations are designed to educate and allow a client to coordinate his/her financial affairs more efficiently, increase cash flow, prudently reduce income taxes, and attempt to improve his/her overall net worth. Once the financial plan is completed and the appropriate advisers have reviewed the plan, a meeting is scheduled to discuss the plan and the specific items to be implemented with the client. Reports will be provided throughout the process and during implementation. As reports are provided ongoing, a full written plan may not be necessary for completion.

Investment Management

Investment advisory services offered by Daviman are specifically tailored to meet the needs of each client. Prior to delivering investment advisory services, the Adviser will ascertain each client’s specific investment objective. Then Daviman will allocate, or recommend that the client allocate, their investment assets consistent with the designated investment objective. Clients may impose reasonable restrictions on any of the Adviser’s investment advisory services at any time, but restrictions must be delivered to the Adviser in writing and must be signed by the client.

Daviman also works with Clients to implement an investment program in which Client accounts are sub-managed by independent third-party money managers. More specifically, Daviman will assist Clients in determining the appropriate allocation of the Clients’ invested assets among different asset classes, and in turn may recommend one or more third-party money managers who specialize in each of those asset classes. The

third-party managers will be responsible for continuously monitoring the Client account and making trades when necessary.

Retirement Plan Consulting

As part of providing the discretionary or non-discretionary investment services to Plans, Daviman provides certain information and services to the Plan and the Plan Sponsor/Trustees. These other services are designed to assist the Plan Sponsor in meeting its management and fiduciary obligations to the Plan under ERISA.

The other services may consist of the following:

- Platform Provider Search and Plan Set-Up
- Plan Review
- Plan Fee and Cost Review
- Plan Participant Education and Communication
- Plan Benchmarking

In addition, as part of the services provided to the Plan it may make available certain model allocation portfolios to Plan participants. Specifically, participants may enter personal information, such as time horizon, risk tolerance and age, into various educational tools made available by Daviman directly or through its affiliated partners.

Thereafter, some education tools may recommend an allocation model for that participant's retirement assets. There are several allocation models which could be provided by the 3(38) Manager for the Plan and/or Participants ranging from relatively conservative to relatively aggressive based on the participant's questionnaire or approach to risk. Plans and/or Participants are free to accept or reject the allocation models for individual security selection based on Plan availability.

Reports summarizing the participant's current asset allocation, transactions and current holdings can be accessed at any time through the Plan custodian website. Participants are encouraged to visit the Plan custodian website on a regular basis to review their account details. In addition, pooled asset accounts for participants can be obtained from the Third Party Administrator (TPA) annually or upon request to them for a separate fee based on the TPA's independent fee schedule.

All retirement plan consulting services shall be in compliance with the applicable state law(s) regulating retirement plan consulting services. This applies to client accounts that are pension or other employee benefit plans governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the client accounts are part of a Plan, and Daviman accepts appointments to provide our services to such accounts, Daviman acknowledges that we are a fiduciary within the meaning of Sections 3(21) and 3(38) of ERISA.

Investment Consulting

This service includes discussing with the client investment options, analyzing the client's current investment portfolio, and making recommendations based on the client's specific personal investment criteria.

Please note: It is always the client's responsibility to promptly notify Daviman if there is any change in their financial situation or investment objective. This notification of change allows the Adviser an opportunity to review, evaluate, or revise our previous recommendations or services.

Additional Services

The Adviser may furnish advice on matters not involving securities, such as:

Retirement Income Planning	Personal Financial Planning
Withdrawal Rate Analysis	Education Planning
Cash Flow & Budgeting	Employee Benefits & 401(k) Guidance
Insurance Review & Planning	Corporate Retirement Plan Guidance
Estate & Charitable Gift Planning	Tax Planning
Business Successions	

Other Services

Managed Non-Discretionary Assets

In addition to providing investment management of client assets on a discretionary basis, the Adviser, for a separate and additional fee, provides certain limited services to clients with respect to "Managed Non-Discretionary Assets." These services consist solely of the following:

Daviman is available to consult with the client on a semi-annual basis (or more often if requested by the client) regarding the Managed Non-Discretionary Assets. However, the client is solely responsible for all decisions and consequences on the client's Managed Non-Discretionary Assets, including decisions on whether to retain or sell all or a portion of the Managed Non-Discretionary Assets. This responsibility remains solely with the client regardless of whether any security is reflected on account reports prepared by the Adviser.

Daviman is available to service Managed Non-Discretionary Assets, such as setting up and monitoring regular distributions and special one-time distribution requests.

The Adviser can process any trades on the Managed Non-Discretionary Assets, but only when requested to do so by the client in writing. Upon receipt of any client's written request, Daviman will endeavor, but cannot guarantee, that any such transaction will be affected on the day received or at any specific time or price.

Limitations for Non-Discretionary Assets

Clients that engage the Adviser on a non-discretionary investment advisory basis must be willing to accept that Daviman cannot affect any account transactions without obtaining prior written consent to any such transaction(s) from the client. Thus, in the event of a market correction during which the client is unavailable, Daviman will be unable to affect any account transactions (as it would for its discretionary accounts) without first obtaining the client's written consent.

Tailored Relationships

At the Adviser, advisory services are tailored to the specific needs of each client. Prior to providing advisory services, the Adviser will ascertain each client's investment goals and objectives. The Adviser then allocates and/or recommends that the client allocate investment assets consistent with the designated investment objective. The client may, at any time, impose reasonable restrictions on the Adviser's services, but restrictions must be delivered to the Adviser in writing, and must be signed by the client.

In performing services for the client, the Adviser is not required to verify any information it received from the client or from the client's other professionals and the Adviser is expressly authorized by the client to rely on this information. Each client is advised that it remains the client's responsibility to promptly notify the Adviser if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating, or revising the Adviser's previous recommendations or services to the client.

Managed Assets

As of December 31, 2023, the Adviser managed \$100,956,835 in discretionary assets under management and \$2,616,001 in non-discretionary assets under management for a total of \$103,572,836.

Item 5: Fees and Compensation

Financial Planning Fees

An initial meeting is scheduled with a prospective client at no cost or obligation. The purpose of the meeting is to inform the prospective client of the types of services Daviman provides and to generally discuss what the client desires from such a financial planning relationship. If the prospective client is interested in exploring the Adviser's services in more detail, Daviman will review the prospective client's recent income tax returns and a listing of his/her assets and liabilities. At a subsequent session, the prospective client is given an idea of the specific value of pursuing this financial planning process and is quoted a fee for the financial planning services to be provided. The financial planning fee is quoted on a project basis and covers projected time and expense associated in working with this client for a twelve-month period. This includes gathering data, developing the written plan, reviewing the plan with appropriate advisers, discussing the plan with the

client, implementation, and continuing to review, monitor and update the client's affairs throughout the ensuing twelve months. Appropriate billing will be determined in advance and billed quarterly. The adviser does not solicit prepayment of fees of more than \$1,200 six months or more in advance.

The financial planning fee is based upon several factors, including: net worth, gross income, complexity of one's financial affairs, and the time necessary to meet each individual client's goals and priorities. Certain unforeseen expenses may not be included in the financial planning fee and would be billed directly.

Once the client verbally agrees to the personal financial planning process, the process to develop the written documents begins. Once the financial plan is completed and the appropriate advisers have reviewed the plan, a meeting is scheduled to discuss the plan and the specific items to be implemented with the client. Reports will be provided throughout the process and during implementation. As reports are provided ongoing, a full written plan may not be necessary for completion.

Any balance of the financial planning fee not billed quarterly is billed to the client within 180 days of the start of the relationship and can be paid by the client in any manner suitable to the client within 30 days of the invoice date. The financial planning fee shall be mutually agreed upon in advance by and between the client and Daviman. Any such fee shall be separate from the asset-based investment management fee. The Adviser reserves the right to waive some or the entire financial planning fee.

Ongoing planning services (including plan updates, new analyses and/or projections) can be provided and charged via a retainer fee, typically billed in advance on a quarterly basis. The retainer fee is based upon the estimate of total hours the Adviser will devote to the Client's planning needs and the complexity of the Client's individual circumstances. Daviman's hourly rate is up to \$500 per hour and this fee may be negotiable. Daviman may also provide services for a fixed retainer fee of up to \$250,000 annually, which may be negotiable depending upon the nature and complexity of the client's circumstances. If a fixed fee is negotiated, that fee will be listed in the Advisory Agreement and Disclosure Statement.

The client can terminate the financial planning and/advisory relationship at any time with a 10 days' written notice.

Managed Discretionary and Non-Discretionary Asset Fees

The Adviser bases its annual investment management fee for managed discretionary and non-discretionary assets upon a percentage (%) of the market value of the assets and the specific types of investment management services provided. Daviman charges an annual fee of up to 1.5% of assets under management. The Adviser may choose to charge a lower asset-based fee at its sole discretion.

The typical managed discretionary fee rate will be established once annually, based on the value of the total household assets under management as of the final day of the fourth quarter of the previous year as follows:

Household Assets Under Management	Annualized Fee Rate
Less than \$1,000,000	1.00%
\$1,000,000 - \$2,999,999	0.75%
\$3,000,000 - \$7,500,000	0.50%
More than \$7,500,000	Negotiable

The management fee will then be calculated and charged on a quarterly basis for the following calendar year, in advance, based upon the market value of a client's assets on the last day of the previous quarter times the annualized fee rate as determined above.

At the commencement of the agreement the annualized fee rate will be determined for the remainder of the calendar year based on the household assets under management upon funding of all household accounts and the client will be charged a pro-rated fee based on the number of days remaining in the quarter.

Depending on the type of account the Adviser selects for the client, the fee may also be assessed in arrears by applying our fee schedule to the eligible accounts' Average Daily Balance as valued by the Custodian.

Retirement Plan Consulting Asset Fees

The Adviser bases its annual investment consulting fee for institutional retirement plan assets upon a percentage (%) of the market value of the assets and the specific types of investment consulting services provided. Daviman charges an annual fee of up to 1.50% of assets under management. The Adviser may choose to charge a lower asset-based fee at its sole discretion.

Investment Consulting

The Adviser bases its annual investment consulting fee based upon the specific types of investment consulting services provided. Daviman charges up to 1.50% of the portfolio value or an hourly fee of \$500. The Adviser may choose to charge a lower fee at its sole discretion. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the time/cost could potentially exceed the initial estimate. In such cases, the Adviser will notify the client and may request that the client approve the additional fee. All consulting fees are due upon completion of services. Daviman may waive or lower these fees where the client has engaged Daviman for other advisory services or for such other reasons as determined by the Adviser in its discretion. Clients are not obligated to implement the plan's recommendation through any of the Adviser's other investment advisory services. This service may be terminated upon verbal or written notice by either party.

Negotiated Fees

The Adviser, in its sole discretion, may reduce its investment management fee based upon certain factors, like anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client and other considerations.

Billing of Fees

Daviman's investment management fees shall be assessed quarterly, in advance, based on the asset values as of the day prior to the period being billed. New accounts will be assessed a prorated fee dependent upon the number of days remaining in the quarter. Daviman clients must provide their consent in advance to direct debiting of investment management fees from their custodial account. The Investment Advisory Agreement and the custodial/ clearing agreement authorize the custodian to debit the client account for the amount of the Adviser's investment management fee, and to directly remit that investment management fee to Daviman in compliance with regulatory procedures. In the limited event that the Adviser bills the client directly, payment in full is expected upon presentation of the invoice.

In the event an agreement is terminated, the client will receive a prorated refund for fees paid in advance.

Other Fees

Unless clients direct otherwise or an individual client's circumstances require, the Adviser generally recommends Charles Schwab & Co., Inc. (Schwab) to serve as the broker-dealer/custodian for client investment accounts. Broker-dealers such as those listed above may charge brokerage commissions and/or transaction fees for effecting certain securities transactions. For example, Schwab may charge commissions for individual equity and fixed income securities transactions or fees may be charged for certain no-load mutual fund transactions. In addition to the Adviser's investment management fee, custodial brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g., management fees and other fund expenses). Moreover, client assets may also be subject retirement plan administration fees (if applicable), wire transfer fees, electronic fund fees and other fees and taxes on brokerage accounts and securities transactions.

Although Daviman believes that its fees are competitive, clients should understand that lower fees for comparable services may be available from other sources and firms.

In addition, Adviser may recommend Separately Managed Accounts or 529 accounts. In these cases, Adviser will charge a management fee for any of these types of assets under

our management. The third-party managers of these accounts will also charge a fee. Accordingly, the client should review both the fees charged by the third-party managers and the fees charged by Adviser to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Commission Transactions

The Adviser primarily recommends the purchase of no-load mutual fund securities and/or exchange traded funds for implementing investment recommendations. Daviman does not actively direct clients to traditional, full service /commission brokers. Most of the Adviser's clients do not use traditional brokers. As described earlier, Daviman generally recommends using the services of a centralized custodian/discount broker.

Daviman employs individuals that are also licensed insurance agents. Clients can choose to engage these persons, in their individual capacities, to effect insurance transactions on a commission basis. The recommendation by a Daviman advisory representative (who is also a licensed insurance agent) that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions provides an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No Daviman client is under any obligation to purchase any commission products from any of the Adviser's advisory representatives. Clients are reminded that they may purchase insurance products recommended by Daviman through other, non-affiliated insurance agents. Rone J. Davis, the Adviser's Chief Compliance Officer, is available to answer any questions that a client or future client may have on any conflict of interest this arrangement creates.

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

Sharing of Capital Gains

The Adviser does not advise any client accounts that are subject to performance-based fee arrangements.

Item 7: Types of Clients

Description

The Adviser predominantly offers its services to individuals, high net worth individuals, pension and profit-sharing plans and participants, trusts, estates, charitable organizations, corporations or business entities.

Account Minimums

Daviman does not require an account minimum for investment management services or a minimum account quarterly fee.

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

Methods of Analysis and Investment Strategies

The Adviser's security analysis methods include fundamental analysis, technical analysis, charting and cyclical analysis.

The main sources of information for analysis include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Additional research tools and sources of information that the Adviser uses include mutual fund and stock information provided by unaffiliated third parties (e.g., Morningstar, etc.) and many other reports located on the Internet using the World Wide Web.

The Adviser may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases: (securities held at least a year)
- Short Term Purchases: (securities sold within a year)
- Trading: (securities sold within thirty (30) days)
- Options (contract for the purchase or sale of a security at a predetermined price during a specific period of time)

Strategic and Tactical Asset Allocation may be utilized with domestic mutual funds, exchange-traded funds, or stocks and bonds as the core investments. Global mutual funds, sector funds and specialty exchange-traded funds may be added as satellite positions. Portfolios may be further diversified among large, medium and small sized investments in an effort to control the risk associated with traditional markets. Investment strategies designed for each client are based upon specific objectives stated by the client during consultations. Clients may change their specific objectives at any time. Each client executes an Investment Policy Statement that documents their specific objectives and their desired investment strategy.

Please Note: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy recommended or undertaken by the Adviser will be profitable or equal any specific

performance level. Investing in securities involves risk of loss that clients should be prepared to bear.

Risks of Loss

Risk is inherent in any investment in securities and the Adviser does not guarantee any level of return on a client's investments. There is no assurance that a client's investment objectives will be achieved. A client may be subject to certain risks, including, but not limited to, the risks described below. The risks discussed below vary by investment style or strategy, and may or may not apply to a client. A client should also review the prospectuses or other disclosure documents for the securities purchased for the client's account, as they will contain important information about the risks associated with investing in such securities.

Investment strategies recommended by the Adviser may also be subject to some or all of the following types of risk:

- **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 not buy as much as 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 may 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 investors are interested in buying or selling 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.

Please Note: In light of these risks of loss and potentially enhanced volatility, clients may direct the Adviser, in writing at any time, not to employ any or all of the investment strategies recommended by Daviman for their account.

Recommending Securities

In certain situations, we recommend investments in selected private placements or hedge funds. These types of investments may present unique risks due to the use of leverage and potential lack of liquidity. In addition, such recommendations may be limited only to those clients that are termed as "Accredited Investors" as defined in Rule 205-3 of the Investment Advisers Act of 1940. These types of investments also have varied and unique fee structures of their own. In the event we receive a portion of the fee charged from a third-party manager, the value of a client's assets invested with that manager will be removed from the asset based upon which our fees are calculated and billed. Due to the unique and complex nature of these investments, clients will receive a separate disclosure prior to any investments being made.

Item 9: Disciplinary Information

Legal and Disciplinary

The Adviser has not been the subject of any legal or disciplinary actions.

Item 10: Other Financial Industry Activities and Affiliations

Other Financial Industry Activities

The Adviser is not registered as a securities broker-dealer, futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations

The principal owner and IARs of the Adviser are also insurance agents licensed with the Indiana Department of Insurance. As licensed insurance agents, these IARs offer life, accident, health, variable and long-term care insurance-related products to clients. When acting as insurance agents, each IAR earns commissions on insurance products sales. Such compensation is in addition to, and separate from the compensation they receive from the Adviser for providing investment advice. Insurance products are available through channels not affiliated with the Adviser. Clients have no obligation to purchase insurance products through the IARs.

The Adviser principal owns and operates Back 9 Trust Services, LLC. The Adviser principal is the President of this entity that provides trustee services. In certain circumstances the Adviser will refer current advisory clients to Back 9 Trust Services, LLC. No fee is paid to the Adviser, the principal owner, or the IARs of the Adviser for referrals.

The Adviser principal owner has a related party that owns and operates Front 9 Administration, LLC. The Adviser has a consulting agreement with Front 9 Administration, LLC for various duties. In certain circumstances the Adviser will refer current advisory clients to Front 9 Administration, LLC. No fee is paid to the Adviser, the principal owner, or the IARs of the Adviser for referrals.

The Adviser has entered into an agreement with CIC Services, LLC and CICS, LLC ("CICS") for assistance with the administration and management of captive insurance companies on behalf of clients and/or prospective clients. Should CICS be engaged by any client referred by the Adviser, CICS agrees to pay Adviser fees based upon the type of captive formed for the client. Clients have no obligation to engage the services of CICS for captive insurance.

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

Code of Ethics

The Adviser and its employees may buy and sell securities that they recommend to advisory clients for purchase and sale. To the extent possible, the firm and its employees will process securities transactions for client accounts ahead of similar transactions contemplated for their own accounts. To ensure employee transactions are supervised, we have established a Code of Ethics designed to prevent conflicts of interest. Under the requirements of the Code, each Adviser employee is required to file personal transaction reports regularly for transactions in accounts in which they have a beneficial interest. In addition, certain types of transactions for employee personal accounts require preapproval and certain types of transactions are prohibited. A complete copy of the Adviser's Code of Ethics is available upon request.

Item 12: Brokerage Practices

Broker-Dealer Selection

The Adviser does not maintain physical custody of client assets that it manages, although the Adviser may be deemed to have custody of client assets if clients give Adviser authority to withdraw assets from client accounts. Client assets must be maintained in an account at a "qualified custodian", generally a broker-dealer. The Adviser recommends that clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer,

member SIPC, as the qualified custodian.

Clients have no obligation to use Schwab and may choose another broker-dealer or vendor. The Adviser is independently owned and operated and is not affiliated with any third-party broker-dealers. Client's broker-dealer will hold client assets in an account and buy and sell securities when Adviser or client instructs them to do so. While the Adviser may recommend that clients use Schwab as their custodian, clients will decide whether to do so and will open their account with Schwab by entering into an account agreement directly with Schwab. The Adviser does not open the account for the client, although the Adviser may assist the client in doing so.

How Adviser Recommends Broker/Custodians

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

- Combination of transaction execution services and asset custody services
- Capability to execute, clear, and settle trades (buy and sell securities for client accounts)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.)
- Availability of investment research and tools that assist in making investment decisions
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Quality of services and prior experience with other clients
- Reputation, financial strength, and stability
- Availability of other products and services that benefit Adviser, as discussed below

Client Brokerage and Custody Costs

For client accounts that Schwab maintains, Schwab generally does not charge clients separately for custody services but is compensated by charging commissions or fees on trades that it executes or settles into client Schwab accounts. In addition to transaction-related fees, Schwab charges clients a flat dollar amount as a "prime broker" or "trade away" fee for each trade that the Adviser has executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into client Schwab accounts. These fees are in addition to the transaction-related fees or other compensation clients pay the executing broker-dealer. Because of this, in order to minimize client trading costs, the Adviser has Schwab execute most trades in client accounts. The Adviser has determined that having Schwab execute most trades is

consistent with the Adviser's duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors.

The Adviser may also purchase or sell debt securities through electronic trading platforms. These electronic trading platforms typically provide access to bids and offers from a greater number of dealers on a timely basis; however, these electronic platforms may impose an execution or transaction fee imbedded in the price paid or received for the security (i.e., a markup or markdown).

Products and Services Available From Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like the Adviser. Schwab provides Adviser and Adviser's clients with access to its institutional brokerage – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services to Adviser that may help Adviser manage or administer Adviser's client accounts. Schwab's support services generally are available on an unsolicited basis (Adviser does not have to request them) and at no charge to Adviser. The availability of these services from Schwab benefits Adviser because Adviser does not have to produce or purchase them. It also is a benefit to Adviser because it is operationally more efficient for Adviser to have clients at one custodian.

Schwab also offers other services to Adviser intended to help manage and further develop Adviser's business enterprise. These services generally only benefit the Adviser and include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and related compliance needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to Adviser. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides Adviser with other benefits, such as occasional business entertainment of our personnel. If clients did not maintain their accounts with Schwab, the Adviser would be required to pay for these services from Adviser's own resources. This is a conflict of interest. Adviser believes, however, that taken in the aggregate, Adviser's recommendation of Schwab as custodian and broker is in the best interest of clients.

Order Aggregation, Allocation and Rotation Practices

In order to seek best execution for clients, the Adviser may aggregate contemporaneous buy and sell orders for the accounts over which it has discretionary authority. This practice of bunching trades may enable the Adviser to obtain more favorable execution, including better pricing and enhanced investment opportunities, than would otherwise be available if orders were not aggregated. Bunching transactions may also assist the Adviser in potentially avoiding an adverse effect on the price of a security that could result from simultaneously placing a number of separate, successive or competing, client orders.

It is within the Adviser's sole discretion to bunch transactions and its decision is subject to its duty to seek best execution. The Adviser will aggregate a client's trade orders only when the Adviser deems it to be appropriate and in the best interests of the client and permitted by regulatory requirements.

All advisory clients participating in a bunched transaction will receive the same execution price for the security bought or sold. Average prices may be used when allocating purchases and sales to a client's accounts because such securities may be purchased and sold at different prices in a series of bunched transactions. As a result, the average price received by a client may be higher or lower than the price the client may have received had the transaction been affected for the client independently from the bunched transaction. In addition, a client's transaction costs may vary depending upon, among other things, the type of security bought or sold, and the commission or markup or markdown charged by the executing broker-dealer.

The amount of securities available in the marketplace, at a particular price at a particular time, may not satisfy the needs of all clients participating in a bunched transaction and may be insufficient to provide full allocation across all client accounts. To address this possibility, the Adviser has adopted trade allocation policies and procedures that are designed to make securities allocations to discretionary client accounts in a manner such that all such clients receive fair and equitable treatment. If a bunched transaction cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day will generally be allocated pro rata among the clients participating in the bunched transaction. Adjustments to this pro rata allocation may be made, at the discretion of the Adviser, to take into consideration account specific investment restrictions, undesirable position size, account portfolio weightings, client tax status, client cash positions and client preferences. Adjustments may also be made to avoid a nominal allocation to client accounts.

When the Adviser is not able to aggregate trades, the Adviser generally uses a trade rotation process that is designed to be fair and equitable to its clients.

Directed Brokerage

The Adviser will comply with any guidelines and/or limitations reasonably requested by a client relating to brokerage for the client's account that are contained in the client's investment management agreement. When possible, the Adviser will also observe any non-binding statement of client preferences with respect to brokerage direction.

If a client directs the Adviser to use a particular broker-dealer for execution of the client's trade orders (a "directed brokerage arrangement"), and the Adviser agrees to the arrangement, a client should understand that the Adviser may be unable to achieve best execution for the client's transactions. Any costs related to the directed brokerage arrangement are not included in the Adviser's fee, and the client is solely responsible for monitoring, evaluating and reviewing the arrangement with the directed broker-dealer and paying any commissions or markups or markdowns or other costs imposed by the directed broker-dealer. Additionally, the Adviser generally will not aggregate the client's directed brokerage trade orders with orders for other clients of the Adviser or include such orders in its trade rotation process.

If the Adviser aggregates a client's directed brokerage trade orders with trade orders for other clients of the Adviser, the Adviser may employ the use of "step-outs" to satisfy the client's directed brokerage arrangement. A "step-out" occurs when an executing broker executes the trade and then "steps out" the trade to a clearing broker (which would be the directed broker-dealer in a directed brokerage arrangement) that confirms and settles the trade. In such a case, a client will bear the costs of any commissions, markups or markdowns imposed by the executing broker-dealer in addition to the costs of any commissions, markups or markdowns imposed by the directed broker-dealer.

If a client directs the Adviser to use a particular broker-dealer, and if the particular broker-dealer referred the client to the Adviser or if the particular broker-dealer refers other clients to the Adviser in the future, the Adviser may benefit from the client's directed brokerage arrangement. Because of these benefits, the Adviser may have an economic interest in having the client continue the directed brokerage arrangement. The benefits that the Adviser receives may conflict with the client's interest in having the Adviser recommend that the client utilize another broker-dealer to execute some or all transactions for the client's account.

Before directing the Adviser to use a particular broker-dealer, a client should carefully consider the possible costs or disadvantages of directed brokerage arrangements.

Trading Error Policy

In the event of trading errors caused by the Adviser employees, it is the Adviser's policy to make its clients whole and to document errors in its trade error file. Any Adviser created trade errors that result in a gain to a client, and the gain can be attributed to a client, the client is entitled to keep the gain. If the Adviser makes a trade error that results in a gain

to a client and the gain cannot be attributable to a particular client, Schwab, and not the Adviser, keeps the gain. In that case, if the gain is more than \$100, Schwab will donate the gain to charity. If the gain is less than \$100, Schwab will keep the gain to offset its administrative time and expense.

Item 13: Review of Accounts

Periodic Reviews

The Adviser's portfolio management team generally performs reviews on transactions in each client account. The portfolio management team generally reviews reports documenting each account's performance compared to the performance of a relevant benchmark index at least quarterly.

Review Triggers

In addition to periodic reviews, the Adviser *may* conduct account reviews when a triggering event, like a change in client investment objectives, financial situation, market correction or client request occurs.

Regular Reports and Electronic Delivery

The Adviser generally provides written investment summary reports to clients on a quarterly basis. These monthly investment summary reports contain the client account's holdings, yield, cash flow, gains and losses, and monthly interest earnings. The Adviser may provide additional information in the investment summary report to meet the specific reporting needs of a client as the client and the Adviser may agree.

All client correspondence, as well as all books and records of the Adviser, will be delivered and stored as electronic images and the originals of the electronically stored documents shall be destroyed. Thereafter, all electronic documents shall be deemed to serve as an original copy.

Item 14: Client Referrals and Other Compensation

Client Referrals

The Adviser has entered into a promoter relationship with Travis Jennings, Daniel Jankelunas, and Waypoint Retirement Advisors, LLC (separately "Promoter"), which is permitted under the Investment Advisers Act, for the purpose of referring potential clients to engage the Adviser for its investment strategies or advisory services. The Adviser pays the respective Promoter for such referrals a percentage of the Adviser's fee up to 100% of the asset-based fee that will be described within the Promoter's disclosure. Clients that are referred to the Adviser under this arrangement will not pay more for the Adviser's services than any other of Adviser's clients.

See Item 10 for other referral disclosures.

Other Compensation

The Adviser and its representatives receive certain economic benefits from Schwab in the form of the support products and services. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 Brokerage Practices. The availability to the Adviser of Schwab's products and services is not based on the Adviser giving particular investment advice, such as buying particular securities for clients.

See Item 10 for information regarding Other Compensation regarding sub-advisory and consulting services.

Item 15: Custody

Custody

The Adviser does not take physical custody of client funds or securities. A client who uses a third-party custodian authorizes the Adviser to give instructions to the client's custodian for all actions necessary or incidental to the purchase, sale, exchange, and delivery of securities held in the client's account. Also, the client will receive account statements directly from their selected custodian at least quarterly. Clients should carefully review those account statements and compare them with any account statements provided by the Adviser. Clients may have standing letters of authorization on their accounts. The Adviser has reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

Item 16: Investment Discretion

Discretionary Authority for Trading

Clients can determine to engage the Adviser to provide investment advisory services on a discretionary basis. Prior to the Adviser assuming discretionary authority over a client's account, the client is required to execute an investment management agreement with the Adviser, naming the Adviser as client's attorney and agent in fact, granting the Adviser full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

The Adviser generally accepts reasonable limitations to its discretionary authority with respect to brokerage direction and securities selection, including the designation of particular securities or types of securities that should not be purchased for the client's account, but the client may not require that particular funds or securities (or types) be

purchased for the client's account. Any such limitations agreed to by a client and the Adviser are generally included as an addendum to the client's investment management agreement or in a separate letter of understanding. When possible, the Adviser will also attempt to observe any non-binding statement of client preferences with respect to factors such as brokerage direction, holding periods, and securities selection.

Non-Discretionary Authority for Trading

Clients may also select the Adviser's non-discretionary service module. Clients retain final say in investment selection and decision making. The Adviser works closely with the client to tailor investment strategy to the client's goals and needs, and consults with the client prior to making trades or other changes to the investment portfolio. The Adviser proactively provides the client with investment ideas and a view on current market situations but no transactions are carried out without prior client approval. The Adviser's non-discretionary services also include, amongst other things, (i) careful monitoring of the client's portfolio to ensure that it remains within investment guidelines; (ii) regular performance updates; and (iii) access to seasoned investment professionals prior to making final investment decisions.

Investment Consulting

The Adviser also assists clients with the selection and monitoring of retirement plan assets, offering a well-designed and well-documented process. The Adviser seeks to design an overall investment menu utilizing a risk-budgeting process that addresses the different expectations of return found in varying asset classes. The Adviser seeks strong managers that complement each other, creating overall value to the client and plan participants.

Item 17: Voting Client Securities

Proxy Votes

The Adviser has adopted the following policies and procedures regarding proxy voting for its clients' accounts. At all times, the Adviser has a "duty of care" to its clients, and the Adviser recognizes and accepts this responsibility. Should the Adviser exercise voting authority over its clients' proxies, it must ensure that all proxies are handled in the best interests of its clients.

Currently, Daviman has chosen not to retain voting authority over its clients' proxy voting and has left the voting authority to the clients. All proxy ballots will be sent directly to a client and not the Adviser. Should the client have any questions on how to vote their proxies, they may contact their Adviser at (317) 207-0175.

Any questions on these policies and procedures should be directed to Rone J. Davis who is responsible for updating, maintaining or changing these procedures.

Item 18: Financial Information

Financial Information

The Adviser does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance and, thus, has not included a balance sheet dated not more than 90 days prior to the date of this brochure. The Adviser is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to clients, nor has it been the subject of a bankruptcy petition at any time during the past ten years.

Privacy Policy

We have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that the customer expects us to service their accounts in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about our customers. We want the customer to know what information we collect and how we use and safeguard that information.

What Information We Collect

We collect certain nonpublic personal identifying information about our customers (such as name, address, social security number, etc.) from information that the customer provides on applications or other forms as well as communications (electronic, telephone, written, or in person) with the customer or authorized representatives (such as attorneys, accountants, etc.). We also collect information about brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

What Information We Disclose

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship and then only to those persons necessary to effect the transactions and provide the services that the customer authorizes (such as broker-dealers, custodians, independent managers, etc.); (ii) persons assessing our compliance with industry standards (e.g. professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law. We are permitted by law to disclose the nonpublic personal information about our customers to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any purpose. If the customer decides at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

Security of Customer Information

We restrict access to customer nonpublic personal information to those employees who need to know that information to service the accounts. We maintain physical, electronic, and procedural safeguards that comply with applicable federal or state standards to protect customer personal information.

Changes To Our Privacy Policy Or Relationship With The Customer

Our policy about obtaining and disclosing information may change from time to time. We will provide the customer notice of any material change to this policy before we implement the change.

If your personal information with us becomes inaccurate, or if you need to make a change to that information, please contact us at the number shown below so we can update our records.

Brochure Supplement
(Part 2B of Form ADV)

RONE DAVIS

Investment Adviser Representative

**Daviman Financial, LLC
11650 Olio Rd. Suite 1000-286
Fishers, IN 46037**

**Telephone: (317) 207-0175
www.davimanfinancial.com**

NOTICE: The attached Brochure Supplement provides information about the Investment Adviser Representative of Daviman Financial, LLC (“Daviman” or the “Adviser”), CRD Number 285030. Please contact Rone J. Davis, Chief Compliance Officer, if you did not receive the Adviser’s Part 2A of Form ADV. You can also contact Rone J. Davis if you have any questions about the content of the attached supplement.

Additional information about the Adviser’s investment adviser representatives is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Rone Davis’ CRD number is 4525361.

March 29, 2024

A. General Requirements

Generally, Daviman requires employees to hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of Daviman acting in a representative capacity will be appropriately licensed or registered.

B. Investment Adviser Representative Information

This Brochure Supplement provides information about Rone Davis, the Adviser's investment adviser representative.

Item 2 Education and Business Experience

CRD Number: 4525361

Year of Birth: 1979

Educational Background:

- Manchester College, North Manchester, IN, Bachelor of Science (2002)
- The American College, Bryn Mawr, PA, Master of Science in Financial Services (2013)

He has earned the securities licenses Series 6 (08/2002), 7 (07/2012), and 63 (10/2002).

In addition, Mr. Davis holds the following designations: CFP®, ChFC®, CLU®, MSFS, AIF®, CAP®, and AEP®.

CFP® - Certified Financial Planner™ earned November 2017. In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

The Chartered Financial Consultant® (ChFC®) earned November 2008. This designation is awarded by The American College to financial professionals who have 3 years of qualifying professional work experience within the prior 5 years, complete 7 core and 2 elective courses of 27 semester credit hours, and pass an examination for each course. Candidates must also meet certain ethical standards and agree to comply with The American College Code of Ethics and Procedures and adopt designated standards of professional practice. The ChFC® designation requires 30 hours of continuing education every 2 years.

The Chartered Life Underwriter (CLU®) earned July 2008. This designation is awarded by The American College to financial professionals who have 3 years of qualifying professional work experience in the prior 5 years, complete a designated eight-course program and pass a final examination for each of the 8 courses. Candidates must also meet certain ethical standards and agree to comply with The American College Code of Ethics and Procedures and adopt designated standards of professional practice. The CLU® designation requires 30 hours of continuing education every 2 years.

The Accredited Investment Fiduciary® (AIF®) earned October 2016. This designation is awarded by the Center for Fiduciary Studies. Mr. Davis has received formal training in investment fiduciary responsibility. To receive the AIF® designation, an individual must have a minimum of two years of relevant experience along with a bachelor's degree (or higher) and a professional credential. Or the individual must have a minimum of eight years of relevant experience. The individual must complete AIF® training and pass the AIF® examination while satisfying the Code of Ethics and Conduct Standards before being rewarded with the AIF designation. AIF® designees must accrue a minimum of six hours of continuing education annually. The Center for Fiduciary Studies owns the marks AIF® and AIFA®, which it awards to individuals who successfully complete initial and ongoing accreditation requirements.

The Master of Science in Financial Services (MSFS) earned May 2013. This designation provides you with the tools needed to analyze, plan and implement integrated financial and life strategies. The MSFS degree can be earned in 20 months by completing 12 courses.

To apply for the CAP® designation, the applicant must certify in writing that, for at least three of the five years immediately preceding this application, they have been:

- Actively involved in advising individuals or charitable organizations in any of the following areas: wealth and estate planning, financial planning, charitable planning, charitable giving, planned giving, nonprofit or foundation management or services, investment management of charitable trusts, fund or endowments, or accounting for nonprofit organizations as part of your regular practice or employment or
- Employed in the nonprofit sector in a capacity related to nonprofit management, development, planned giving or fund raising.

The CAP® program consists of three courses. Each is designed for self-study, leading to an objective exam in a local exam center. In addition, weekly webinars are offered to bring CAP® students into conversation with each other about how the material can be used to help clients, donors, and communities.

In applying for the CAP® designation, you also must subscribe to ethical standards, embodied by the American College Code of Ethics and Procedures (which includes the Professional Pledge and eight Canons) and additional ethical codes. In addition to complying with these standards, you also must certify in writing that you meet professional codes, canons of ethics, or standards of practice of licenses or professional designations already earned AND have adopted at least one of the following codes of ethics or standards of practice applicable to fund raisers and charitable planners:

- The Code of Ethical Principles and Standards of Professional Practice of the Association of Fundraising Professionals (AFP)
- The model Standards of Practice for the Charitable Gift Planner adopted by the National Committee on Planned Giving (NCPG) and the American Council on Gift Annuities (ACGA).

The certificant must also subscribe in writing to the provisions of the Donor Bill of Rights originally promulgated by the American Association of Fundraising Counsel (AAFRC), the Association for Healthcare Philanthropy (AHP), the Council for Advancement and Support of Education (CASE), and the AFP. Copies of these standards are provided to applicants as part of the application process.

The Accredited Estate Planner® (AEP®) earned February 2022. This designation is a graduate level specialization in estate planning, obtained in addition to already recognized professional credentials within the various disciplines of estate planning. It is awarded by the National Association of Estate Planners and Councils (NAEPC) to recognize estate planning professionals who meet stringent requirements of experience, knowledge, education, professional reputation, and character.

An Accredited Estate Planner® applicant must meet ALL of the following

requirements as established by the National Association of Estate Planners & Councils:

1. Credential requirement. To be eligible to be considered for the AEP® designation, the applicant must provide documentation of being licensed to practice law as an Attorney (JD) or to practice as a Certified Public Accountant (CPA), or of being currently designated as a Chartered Life Underwriter® (CLU®), Chartered Financial Consultant® (ChFC®), Certified Financial Planner (CFP®), or Certified Trust & Fiduciary Advisor (CTFA), in any jurisdiction of the United States of America.
2. Professional discipline engaged in estate planning requirement. The applicant must be presently and significantly engaged in “estate planning activities” as an attorney, an accountant, an insurance professional and financial planner, or a trust officer. Estate planning encompasses the accumulation, conservation, preservation, and transfer of an estate through planning and implementation of an estate plan. The overall purpose of the estate planning process is to develop a plan that will maintain the financial security of

individuals and their families. Estate planning has come to include lifetime planning that leads to conservation and transfer of assets. Estate planning should also facilitate the intended and orderly transfer of property at death, taking into consideration the family unit and the potential costs of different methods.

RELATED BUSINESS EXPERIENCE:

- | | | |
|-----------------------------------|--------------------|------------------|
| • Daviman Financial, LLC | President and IAR | (2016 – Present) |
| • NYLife Securities, LLC | Registered Rep | (2002 - 2016) |
| • Eagle Strategies | Investment Advisor | (2012 - 2016) |
| • New York Life Insurance Company | Agent | (2002 - 2016) |

Item 3 Disciplinary Information

Mr. Davis does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

Mr. Davis is a licensed insurance agent with the Indiana Department of Insurance. Mr. Davis offers life, accident, health, and long term care insurance-related products to clients through Innovative Insurance, LLC. When acting as an insurance agent, Mr. Davis earns commissions on insurance products sales. A conflict of interest exists when Mr. Davis receives compensation as an insurance agent.

Other Professional Activities

- | | |
|---|-----------------------------|
| • Back 9 Trust Services, LLC | President/ Trustee Services |
| • Semi Profession/Professional Pool Player | Other |
| • Referee and Instructor for Valley National Eight Ball Association | Other |

Item 5 Additional Compensation

See above regarding Mr. Davis' outside business activities.

Item 6 Supervision

Mr. Davis is the President and Investment Adviser Representative of Daviman Financial, LLC. The Adviser has and provides investment advisory and supervisory services in accordance with its policies and procedures manual. The Adviser's Chief Compliance Officer, Rone J. Davis, is primarily responsible for implementation of the Adviser's policies and procedures. The Chief Compliance Officer's personal securities transactions are reviewed by the Chief Compliance Officer Designee.

Brochure Supplement

(Part 2B of Form ADV)

BRENDAN M. CREWS

Investment Adviser Representative

Daviman Financial, LLC
11650 Olio Rd. Suite 1000-286
Fishers, IN 46037

Telephone: (317) 207-0175
www.davimanfinancial.com

NOTICE: The attached Brochure Supplement provides information about the Investment Adviser Representative of Daviman Financial, LLC (“Daviman” or the “Adviser”), CRD Number 285030. Please contact Rone J. Davis, Chief Compliance Officer, if you did not receive the Adviser’s Part 2A of Form ADV. You can also contact Rone J. Davis if you have any questions about the content of the attached supplement.

Additional information about the Adviser’s investment adviser representatives is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Brendan Crew’s CRD number is 5960522.

March 29, 2024

A. General Requirements

Generally, Daviman requires employees to hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of Daviman acting in a representative capacity will be appropriately licensed or registered.

B. Investment Adviser Representative Information

This Brochure Supplement provides information about Brendan M. Crews, the Adviser's investment adviser representative.

Item 2 Education and Business Experience

CRD Number: 5960522

Year of Birth: 1979

Educational Background:

- IUPUI, Indianapolis, IN, Bachelor of Science (2001)
- IUPUI, Indianapolis, IN, Masters of Science (2005)

He has earned the securities licenses Series 6 (11/2011), 7 (03/2015), 63 (12/2011), and 66 (07/2016).

In addition, Mr. Crews holds the CFP® and ChFC® designation.

CFP® - Certified Financial Planner™ earned April 2019. In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

The Chartered Financial Consultant® (ChFC®) earned May 2021. This designation is awarded by The American College to financial professionals who have 3 years of qualifying professional work experience within the prior 5 years, complete 7 core and 2 elective courses of 27 semester credit hours, and pass an examination for each course. Candidates must also meet certain ethical standards and agree to comply with The American College Code of Ethics and Procedures and adopt designated standards of professional practice. The ChFC® designation requires 30 hours of continuing education every 2 years.

RELATED BUSINESS EXPERIENCE:

- | | | |
|-----------------------------------|----------------|------------------|
| • Daviman Financial, LLC | IAR | (2017 – Present) |
| • Eagle Strategies | IAR | (2016 - 2016) |
| • NYLife Securities, LLC | Registered Rep | (2011 - 2016) |
| • New York Life Insurance Company | Agent | (2011 - 2016) |

Item 3 Disciplinary Information

Mr. Crews does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

Mr. Crews is a licensed insurance agent with the Indiana Department of Insurance. Mr. Crews offers life, accident, health, and long-term care insurance-related products to clients through Crews and Company, LLC. When acting as an insurance agent, Mr. Crews earns commissions on insurance products sales. A conflict of interest exists when Mr. Crews receives compensation as an insurance agent.

Item 5 Additional Compensation

See above regarding Mr. Crews outside business activities.

Item 6 Supervision

Mr. Crews is an Investment Adviser Representative of Daviman Financial, LLC. The Adviser has and provides investment advisory and supervisory services in accordance with its policies and procedures manual. The Adviser's Chief Compliance Officer, Rone J. Davis, is primarily responsible for implementation of the Adviser's policies and procedures.