



Widmann Financial Services, Inc.

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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Widmann Financial Services. If you have any questions about the contents of this brochure, please contact us at 301-262-2919 and/or info@widmannfinancial.com. 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 Widmann Financial Services is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Widmann Financial Services is 289106.

Any references to Widmann Financial Services as a registered investment adviser or its related persons as registered Advisory Representatives does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

At least annually, this section will discuss only specific material changes that are made to the Widmann Financial Services Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

The filing of our last annual updating amendment was dated March 14, 2023. Since that time, we have made the following material changes to our brochure:

- Item 4 was amended to enhance existing disclosures regarding existing conflicts of interest created by retirement account rollovers and the choice of investment programs available to Clients.
- Item 8 was amended to include additional disclosure regarding risk areas applicable to investing in securities.
- Item 12 was amended to enhance disclosure regarding Commonwealth's cash sweep/bank deposit program.

Copies of our updated brochure and brochure supplements are available to you free of charge and may be requested by contacting us at 301-262-2919 and/or info@widmannfinancial.com.

Additional information about Widmann Financial Services is also available via the SEC's website www.adviserinfo.sec.gov. The IARD number for Widmann Financial Services is 289106. The SEC's website also provides information about any persons affiliated with Widmann Financial Services who are registered, or are required to be registered, as Advisory Representatives of Widmann Financial Services.

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Item 4 Advisory Business

Widmann Financial Services, Inc. (hereinafter referred to as "Widmann Financial Services") is an independent investment advisory firm offering asset management and financial planning and consulting services customized to the needs of individuals and their families, charitable organizations, and businesses. The services are more fully described below.

A. Widmann Financial Services began operations in 1988 and filed for registration with the Securities and Exchange Commission in September 2017. Arden "Art" Widmann, CRD number 1891122, is the majority owner and President. Art has been in the financial services industry since 1988. Additional business information about Art and the other Advisory Representatives who work with clients is disclosed in the accompanying supplemental brochure(s).

B. Widmann Financial Services offers the following advisory services, with each service more fully described below:

- Asset Management Services
- Financial Planning/Consultation Services
- Financial Education Seminars

Description of Services Available

Widmann Financial Services offers a suite of investment advisory services and programs to its advisors for use with their clients. Our investment advisory services and programs are designed to accommodate a wide range of client investment philosophies, goals, needs, and investment objectives. Through these various advisory programs and services, clients have access to a wide range of securities products, including, but not limited to, common and preferred stocks; municipal, corporate, and government fixed income securities; mutual funds; exchange-traded products ("ETPs"); options and derivatives; unit investment trusts ("UITs"); and variable and fixed-indexed insurance products, as well as other products and services, including a variety of asset allocation services, financial planning, and consulting services. Our advisors may also offer advice related to direct participation programs, private placements, and other alternative investments, such as alternative energy programs, research and development programs, leasing programs, real estate programs, and pooled commodities futures programs.

Asset Management Services

We will gather financial information from you and complete an analysis of your situation. Our Advisory Representative will then determine an asset allocation customized to your financial goals, objectives, and risk tolerance. We customize your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time, and your financial situation, goals, and objectives.

Our Advisory Representative will schedule a meeting with you and discuss the recommended portfolio allocation and how your account will be managed. Upon your approval, we will implement the initial portfolio allocation. After we implement the initial portfolio allocation, with your written approval as indicated in the Advisory Agreement, Widmann Financial Services will provide continuous and ongoing management of your account on a discretionary basis. We will use our own discretion to determine any changes to the account. We will manage the account and will make changes to the allocation as deemed appropriate by the firm and your Advisory Representative. We will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. We will generally hold positions in your account for the long term. However, depending on your specific goals and objectives, we may actively trade some securities, holding such positions for less than a year, even periods of 30 days or less. Your portfolio may be similarly managed and contain similar holdings as compared to other clients' managed accounts. However, since our investment strategies and advice are

based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

Our Advisory Representatives primarily use open-ended mutual funds, close-end funds, exchange traded funds (ETFs), individual stocks and bonds. However, managed accounts are not exclusively limited to those products and include certificates of deposits, government securities, money markets, options or other products, as are suitable based on your goals and objectives.

Registered investment company securities such as mutual funds are offered in various share classes. Share classes are priced differently and have varying levels of internal costs. Share classes, other than institutional share classes, involve higher internal costs that over time will cost you more. Institutional share classes, which tend to have low annual expenses, often have higher trading costs. The Advisory Representative and the client need to consider the amount being invested and the length of anticipated holding to make a decision as to the share class most suitable to the client. Please read the disclosures under Item 10 for important information about the advice and recommendations offered by our Advisory Representatives. Advisory Representatives of Widmann Financial Services are dually registered as Registered Representatives and IARs of Commonwealth Financial Network® ("Commonwealth"), a FINRA-registered broker-dealer and SEC-registered investment adviser. As further described below, Widmann Financial Services has entered into a relationship to offer you brokerage services through Commonwealth. There is no affiliation between Widmann Financial Services and Commonwealth. Investment Adviser Representatives (IARs) will select the lowest cost share class funds available that are appropriate to the specific client situation. By selecting the lowest cost share class, trading costs are, at times, higher. Additionally, selecting the lowest cost share class appropriate to the situation does not mean the least expensive share class; however, it is what your Advisory Representative deems to be the lowest cost for your specific situation. Advisory Representatives consider the anticipated holding period, cost structure, and administrative and transaction costs associated with the product when selecting a share class. However, there is no way to predict the future and there are occasions where a holding is liquidated sooner or held longer than initially anticipated resulting in higher costs to the client.

In some situations, managed accounts will contain other securities such as limited partnerships, non-publicly traded real estate investment trusts (REITs), and alternative investments. These other investments are also excluded from fee billing if our Advisory Representative, in the capacity as a Registered Representative of Commonwealth, has or is receiving commissions and/or trail compensation. In some situations, this compensation is higher than the ongoing advisory fee that would be charged. Certain limited partnerships, real estate investment trusts, and alternative investments offer units in an advisory share class where no commissions or trail compensation is paid. In such cases, a value is obtained at least annually and an advisory fee, as disclosed under Item 5, is charged to the client. Please refer to Item 8 for information about alternative investments.

Transactions in the account, account reallocations, and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts, and other qualified retirement accounts.

If you select another brokerage firm for custodial and/or brokerage services, you will not be able to receive asset management services from Widmann Financial Services. Our Advisory Representatives must adhere to FINRA rules and regulations and the policies and procedures of Commonwealth. Commonwealth's policies and procedures and FINRA rules prohibit them from conducting transactions at a broker-dealer for which approval has not been obtained from Commonwealth.

Assets can be deposited on which a commission was previously paid, including mutual funds on which a sales charge was paid, to a fee-based account. You may not want to open fee-based brokerage accounts with the proceeds from the sale of commission trades because you will then bear the transaction fees on purchases and sales of the commission trades and the fees and charges associated with the fee-based

brokerage account.

Please be aware that you are under no obligation to purchase products or services recommended by Widmann Financial Services in connection with providing you with any advisory service that we offer. You have the right to decide whether or not to implement our advice and the right to consult with other financial professionals for implementation.

Fees for our asset management services are described in Item 5 of this brochure and are based on the level of assets in your managed account.

Financial Planning/Consulting Services

Widmann Financial Services provides financial planning/consulting services based on your financial and tax status, age, risk tolerance, and investment objectives. Depending on your needs, our advice includes topics such as:

- Tax planning analysis
- Estate planning analysis
- Business planning
- Retirement planning
- Education planning
- Budgeting and cash flow
- Fringe benefit analysis
- Investment analysis
- Charitable planning

Our services are broad or focused on one or more topics to address your unique situation. Generally, recommendations are made orally and discussed during meetings; however, if financial planning software is used to evaluate scenarios and presented to the client, recommendations are usually provided by hard or soft copy.

The financial planning/consulting process will begin with an initial consultation to assess if we can help you with your specific needs. If you decide to engage us for services, you will be required to sign our advisory agreement outlining the relationship and specifying our fee.

We also provide investment advice on a more limited basis in the form of a "financial checkup" consultation service, which is comprised of a consultation and discussion of our recommendations.

Planning services are based on your financial situation at the time and on financial information disclosed by you to Widmann Financial Services. You need to be aware that certain assumptions will be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is no indication of future performance. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, together, we must continue to review the plan and update it based on changes in your financial situation, goals, or objectives or changes in the economy. If your financial situation or investment goals or objectives change, you must notify us promptly of the changes. The advice offered by Widmann Financial Services is limited and you may need to seek the services of other professionals such as an insurance adviser, attorney, and/or accountant.

You are not obligated to implement advice through Widmann Financial Services or its Advisory Representatives. If you do choose to implement the plan with our Advisory Representatives, they will receive commissions or other compensation in addition to the advisory fee you paid for financial planning services. You may purchase the securities recommended by Widmann Financial Services directly or through other brokers or agents not affiliated with Widmann Financial Services. You have the right to decide

whether or not to implement our advice and the right to consult with other financial professionals for implementation.

Financial Education Seminars

Our Advisory Representatives conduct financial education seminars on topics such as estate planning, investment strategies, and retirement needs. We partner with attorneys and other professionals to offer these seminars. Seminar participants may subsequently choose to participate in an initial consultation with us. The consultation will consist of a general review of the seminar participant's financial situation, issues, and concerns and an explanation of the services we offer.

We tailor the advisory services we offer to your individual needs. You may impose restrictions and/or limitations on investing in certain securities or types of securities. Our Advisory Representative will meet with you and conduct an interview and data gathering session to continue the due diligence process. The information we gather will assist us in providing you with the requested services and customizing the services to your financial situation. Depending on the services you have requested, we will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Existing portfolio statements, including retirement account information
- Financial needs
- Tax bracket information
- Cash-flow analysis
- Cost-of-living needs
- Savings tendencies
- Other applicable financial information required by our Advisory Representative to provide the investment advisory services you have requested.

Widmann Financial Services does not offer a wrap fee program.

As of December 31, 2023, we provide continuous management services for \$340,489,210 in client assets on a discretionary basis and \$979,512 on a non-discretionary basis.

Program Choice Conflicts of Interest

Clients should be aware that the compensation to Widmann Financial Services and your advisor will differ according to the specific advisory programs or services provided. This compensation to Widmann Financial Services and your advisor may be more than the amounts we would otherwise receive if you participated in another program or paid for investment advice, brokerage, or other relevant services separately. Lower fees for comparable services may be available through our firm or from other sources. Widmann Financial Services and your advisor have a financial incentive to recommend advisory programs or services that provide us higher compensation over other comparable programs or services available from our firm or elsewhere that may cost you less. For example, the costs you will incur to have your account managed by our firm may be more than what other similar firms may charge. It's important to understand all the associated costs and benefits the program and services you select so you can decide which programs and services are best suited for your unique financial goals, investment objective, and time horizon. We encourage you to review our Form CRS and to discuss your options with your advisor.

In addition, Commonwealth offers our firm and our advisors one or more forms of financial benefits based on our total assets under management held at Commonwealth or in Commonwealth's PPS Program accounts, as well as financial assistance for transitioning from another firm to Commonwealth. The types

of financial benefits that your advisor may receive from Commonwealth include, but are not limited to, forgivable or unforgivable loans, enhanced payouts, and discounts or waivers on transaction, platform, and account fees; technology fees; research package fees; financial planning software fees; administrative fees; brokerage account fees; account transfer fees; licensing and insurance costs; and the cost of attending conferences and events. The enhanced payouts, discounts, and other forms of financial benefits that your advisor may have the opportunity to receive from Commonwealth provide a financial incentive for our firm and your advisor to select Commonwealth as broker/dealer for your accounts over other broker/dealers from which they may not receive similar financial benefits. Please see items 12 and 14 of this Brochure for more detailed information about these types of conflicts and our relationship with Commonwealth.

In the same manner as many advisors offer asset management fee discounts to their larger clients, Commonwealth offers those advisors to whom it charges administrative fees discounts based on their total assets under management. As these advisors grow their business, Commonwealth's economies of scale are shared with those advisors by reducing the percentage amount of administrative fees that would otherwise be charged to the advisors. These discounts in administrative fees and higher payouts for reaching various AUM levels present a conflict of interest because they provide a financial incentive for advisors who receive the discounts to recommend PPS programs or other managed or wrap account programs over other available programs that do not offer such discounts or higher payouts to the advisors. On the other hand, because Commonwealth does not assess administrative fees to advisors when they use certain other third party managed account programs depending upon the costs and fees of a particular third-party program, advisors may have a financial incentive to use one or more third party programs, which also creates a conflict of interest.

General Information

The investment recommendations and advice offered by Widmann Financial Services and your Advisory Representative are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. Our primary goal is to help our clients identify and pursue their financial goals, thereby enhancing the overall quality of their lives.

Retirement Account Rollovers

Depending on a client's given circumstances, Widmann Financial Services may recommend that a client rollover retirement plan assets to an Individual Retirement Account (IRA) managed by us. As a result of a rollover, Widmann Financial Services may earn fees on those accounts. This presents a conflict of interest, as Widmann Financial Services has a financial incentive to recommend that a client roll over retirement assets into an IRA we will manage. This conflict is disclosed to clients verbally and in this brochure. Clients are also advised that they are under no obligation to implement the recommendation to roll over retirement plan assets. Widmann Financial Services attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Item 5 Fees and Compensation

Asset Management Services

A. Our fees are negotiable and are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds in your account. Transaction charges and other account-related fees assessed by the account custodian or Commonwealth are not negotiable. The Fee Schedule is as follows:

Account Size	Maximum Annual Fee
First \$250,000	1.75%
Next \$750,000	1.25%
Next \$1,500,000	1.00%
Next \$2,500,000	0.75%
Above \$5,000,000	0.50%

Generally, your annual fee is based on an aggregate value of all managed accounts within your established household. For these multiple accounts, we can deduct an aggregated advisory fee from one selected account.

We sometimes make exceptions to our general fee schedule under certain circumstances (e.g., responsibilities involved, accounts or groups of accounts which are expected to have significant capital additions in the future, anticipated future earning capacity, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.). In such cases, lower fees or different payment arrangements can be negotiated with each client separately and will be described in the client's advisory agreement.

You may make additions to the account or withdrawals from the account, provided the account continues to meet minimum account size requirements. No fee adjustments will be made during the quarter for additional deposits, partial withdrawals, or for account appreciation or depreciation due to market fluctuation.

B. If the account is established or closed during the quarter, you will pay a prorated portion of the advisory fee based on the number of days the account was under our management. New clients establishing a managed account household will pay a prorated portion of the advisory fee based on the number of days the account was under Widmann Financial Services' management. Advisory fees will be charged to and collected directly from the account for your Asset Management fees.

You will need to grant Widmann Financial Services the authorization to instruct the custodian to debit your fee. The custodian, National Financial Services (NFS), will provide you with a quarterly or monthly statement that lists the total fees deducted from the account as well as all transactions that were conducted in the account that quarter/month.

C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. You will also pay fees for custodial services, account maintenance fees, and other fees associated with maintaining the account. These fees are not charged by Widmann Financial Services and are charged by the product, broker-dealer, or account custodian. Widmann Financial Services does not share in any portion of these fees. Additionally, you will pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. These advisory fees are not shared with Widmann Financial Services and are compensation to the fund manager. More information is available in the mutual fund prospectus.

D. Commonwealth performs fee billing on our firm's behalf. The Asset Management fee is billed quarterly in advance using a tiered fee schedule and is computed as one-quarter of the annual fee based on the value of the account* on the last business day of the previous calendar quarter. If your account does not contain sufficient funds to pay the advisory fees, we have the limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. Except for ERISA and IRA accounts, you may reimburse your account for advisory fees paid to Widmann Financial Services.

Fee calculation example for a \$1,500,000 dollar account:

- First \$250,000 x 1.75% = \$4,375
- Next \$750,000 x 1.25% = \$9,375
- Remaining \$500,000 x 1.00% = \$5,000

Total \$18,750 divided by 4 = **Quarterly Fee is \$4,687.50**

If Widmann Financial Services should change the above fee schedule, prior notice will be given to you.

*Account values in the Commonwealth Financial Practice 360 reporting system will be used for Widmann Financial Services' quarterly fee calculations for advisory accounts custodied at National Financial Services (NFS). Although account holdings and asset valuations should generally match, month-end market values reflected in Commonwealth's Practice 360 reporting system sometimes differ from those provided by NFS on their month-end statements. The three most common reasons why these values may differ are (i) differences in the manner in which accrued interest is calculated, (ii) differences in the date upon which "as of" dividends and capital gains are reported, and (iii) differences in whether settlement date valuations or trade date valuations are used. If you have any questions or believe there are material discrepancies between your NFS custodial statement and Commonwealth's Practice 360 reporting system, please contact Widmann Financial Services at 301-262-2919. The Commonwealth Practice 360 report valuations are available online via your Investor 360 account or you may request a copy from your Widmann Financial Services' Advisory Representative.

Clients who elect to open a margin account acknowledge and agree that margin may be exercised against their account for purposes including, but not limited to, covering debits, management fees, and/or other billing and administrative costs. Management fees on margin accounts will be assessed on the equity (e.g., ownership) portion of the account and not on the account's total market value.

Termination Provisions

You may terminate investment advisory services obtained from Widmann Financial Services, without penalty, upon written notice within 5 business days after entering into the advisory agreement with Widmann Financial Services. You will, however, be responsible for any fees and charges incurred from third parties as a result of maintaining the account, such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, if you terminate investment advisory services during a quarter, written notice must be given and you will be charged a pro rata portion of the advisory fee for the quarter up to the date of the termination. Unearned prepaid fees will be refunded to you upon termination for any reason.

E. IARs will not receive commissions on assets in our Asset Management program. However, when serving as a Registered Representative of Commonwealth, IARs may receive trail commissions (i.e., 12b-1 fees) for a period of time as a result of directing securities transactions through non-managed Commonwealth brokerage accounts. Load and no-load mutual funds pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees are initially paid to Commonwealth and a portion passed to the Advisory Representative

when serving as a Registered Representative. The receipt of these fees represents an incentive for the Advisory Representative to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a conflict of interest because the receipt of compensation provides an incentive to recommend investment products for non-managed accounts based on the compensation received rather than on your needs.

Advisory Representatives are also Advisory Representatives of Commonwealth and offer securities products on a fee basis and receive advisory fees. There is a conflict of interest in that they recommend the use of advisory programs at Commonwealth for which they will receive compensation.

As stated above in Item 4, registered investment company securities, such as mutual funds, are offered in various share classes. The share classes have different fee and expense structures. Some managed accounts contain previously purchased A and/or C share mutual funds that are more expensive for the client. A and C share classes pay trail compensation, which is paid to the broker-dealer with which the Advisory Representative (in the capacity of a Registered Representative) is registered. Typically, a portion of the trail compensation is paid to the Advisory Representative, in the capacity of a Registered Representative. C shares do not enable the Advisory Representative to convert to an institutional share class and certain investment companies will only convert a C share to an A share after ten years. Further, the sale of C shares, in order to switch to another share class, requires a sell transaction that can result in tax consequences to the client. This is a conflict of interest since the Advisory Representative has an interest in the compensation. This compensation can be higher than what you would have paid if the shares were converted to an institutional share class and an advisory fee was charged on the value. To mitigate the conflict of interest, this disclosure is provided.

From time to time, Widmann Financial Services will utilize variable annuity products. The following provides important information about the cost structure of variable annuity products.

Variable annuity products have additional costs to the client. These costs include surrender fees if the purchase of the product results from the transfer from another variable product; costs associated with living or death benefits; administrative fees; sub-account management fees; mortality and expense fees; and bonus expenses if the product has a bonus element. Certain variable annuities have surrender fees if the annuity is transferred or liquidated within the stated surrender period. Surrender periods can range from 0 to 10 years depending on the individual product purchased. Additionally, certain variable products often have limitations on the number of transactions that can be conducted among the subaccounts. Exceeding the limitation could result in additional expenses. It is vital clients read the variable annuity prospectus for details on all of the costs associated with the product. Furthermore, depending on the annuity product, Advisory Representatives, in their role as Registered Representatives, will receive selling compensation paid through the broker-dealer.

Variable annuities managed by Widmann Financial Services where an advisory fee is charged are fee-based variable products and no commissions or trail compensation is earned by Widmann Financial Services or our Advisory Representative. Additionally, the internal expenses of the annuity product are less than if the client purchased the annuity product on a commission basis.

Alternative investments have additional costs and expenses including a management fee. Disclosures of the costs, fees, expenses and risks are disclosed in the offering memorandum. It is important clients read the offering memorandum for complete information about all costs and expenses associated with the product.

As previously noted, you are not obligated to implement financial planning/consulting advice through Widmann Financial Services or its IARs.

Financial Planning/Consulting Services

Fees for planning/consulting services are strictly for planning/consulting services. Therefore, you will pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Widmann Financial Services offers financial planning and consulting services on an hourly and a fixed fee basis. Fees are negotiable and will depend on several factors including time spent with us, number of meetings, complexity of your situation, amount of research, services requested, and staff resources. As agreed upon with your Advisory Representative, fees will be paid at the time of service, in advance of service, or after service has been rendered.

Our hourly fee is up to \$500 per hour and is based on the expertise and credentials of the provider and the service provided. The financial checkup fee is up to \$350. Fees are payable upfront or upon completion of project/delivery of the planning recommendations (or other agreed upon time) as invoiced by Widmann Financial Services.

The advisory agreement for financial planning and consulting services, unless otherwise stated, is in effect through the delivery to you of final documentation/recommendations unless terminated prior to that date. Either you or Widmann Financial Services may terminate the agreement at any time. Notice shall be in writing and delivered to the appropriate party's last known address. Any unpaid fees earned by Widmann Financial Services will be paid within 15 days of the termination of the agreement.

Unearned prepaid fees will be refunded to you upon termination for any reason. There is no provision for refunds for work that has already been performed.

Financial Education Seminars

Fees may be charged for seminars given to individuals, clubs, civic groups or employee groups. When fees are charged, they are negotiable and generally will not exceed \$2,000 for a half-day seminar.

They may also include fees for preparation time and travel expenses.

Other fees and costs

Commonwealth assesses trade confirmation fees to clients to offset the asset-based fees it pays to its clearing broker/dealer and to generate additional revenue for Commonwealth.

In addition to the charges noted above, clients incur certain charges in connection with certain investments, transactions, and services in your account. In many cases, Commonwealth will receive a portion of these fees and charges or add a markup to the charges clients would otherwise pay to generate additional revenue for Commonwealth. The actual fees and charges that clients will incur are dependent upon the type of account and the nature and quantity of the transactions that occur, the services that are provided, or the positions that are held in the account. Additional fees and charges that clients will typically pay include, but are not limited to:

- Mutual fund or money market 12b-1 fees, subtransfer agent fees, and distributor fees
- Mutual fund and ETF money market management fees and administrative expenses
- Mutual fund transaction and redemption fees
- Certain deferred sales charges on mutual funds purchased or transferred into the account
- Other transaction charges and service fees
- IRA and qualified retirement plan fees
- Other charges that may be required by law
- Brokerage account fees and charges

Information describing the brokerage fees and charges that are applicable to a Commonwealth brokerage or Widmann Financial Services managed account is provided on Commonwealth's Schedule of

Miscellaneous Account and Service Fees, which is available on Commonwealth's website at www.commonwealth.com/clients/media/Commonwealth_Brokerage_Fee_Schedule.pdf.

Widmann Financial Services advisory representatives may select share classes of mutual funds that pay advisors 12b-1 fees when lower-cost institutional or advisory share classes of the same mutual fund exist that do not pay Widmann Financial Services or your advisor additional fees. As a matter of policy, Commonwealth (on Widmann Financial Services' behalf) credits the mutual fund 12b-1 fees it receives from mutual funds purchased or held in Widmann Financial Services managed accounts back to the client accounts paying such 12b-1 fees.

In most cases, mutual fund companies offer multiple share classes of the same mutual fund. Some share classes of a fund charge higher internal expenses, whereas other share classes of a fund charge lower internal expenses. Institutional and advisory share classes typically have lower expense ratios and are less costly for a client to hold than Class A shares or other share classes that are eligible for purchase in an advisory account. Mutual funds that offer institutional share classes, advisory share classes, and other share classes with lower expense ratios are available to investors who meet specific eligibility requirements that are described in the mutual fund's prospectus or its statement of additional information. These eligibility requirements include, but may not be limited to, investments meeting certain minimum dollar amounts and accounts that the fund considers qualified fee-based programs. The lowest-cost mutual fund share class for a fund may not be offered through our clearing firm or made available by Widmann Financial Services for purchase within our managed accounts. Clients should never assume that they will be invested in the share class with the lowest possible expense ratio or cost.

Widmann Financial Services urges clients to discuss with their advisor whether lower-cost share classes are available in their program account. Clients should also ask their advisor why the funds or other investments that will be purchased or held in their managed account are appropriate for them in consideration of their expected holding period, investment objective, risk tolerance, time horizon, financial condition, amount invested, trading frequency, the amount of the advisory fee charged, whether the client will pay transaction charges for fund purchases and sales, whether clients will pay higher internal fund expenses in lieu of transaction charges that could adversely affect long-term performance, and relevant tax considerations. Your advisor may recommend, select, or continue to hold a fund share class that charges you higher internal expenses than other available share classes for the same fund.

The purchase or sale of transaction-fee ("TF") funds available for investment through Widmann Financial Services will result in the assessment of transaction charges to you, your advisor, Widmann Financial Services or Commonwealth. Although no-transaction-fee ("NTF") funds do not assess transaction charges, most NTF funds have higher internal expenses than funds that do not participate in an NTF program. These higher internal fund expenses are assessed to investors who purchase or hold NTF funds. Depending upon the frequency of trading and hold periods, NTF funds may cost you more, or may cost Widmann Financial Services, Commonwealth or your advisor less, than mutual funds that assess transaction charges but have lower internal expenses. In addition, the higher internal expenses charged to clients who hold NTF funds will adversely affect the long-term performance of their accounts when compared to share classes of the same fund that assess lower internal expenses.

Prorated Rebate of Fees Paid in Advance

In the event a client terminates an advisory agreement with Widmann Financial Services and his or her advisor, any unearned fees resulting from advanced payments will be refunded to the client. Likewise, in the event Widmann Financial Services bills Services clients in arrears for services that have already been rendered, Widmann Financial Services will prorate such fees up to the termination date of the advisory agreement.

Other Forms of Compensation

As mentioned above, an ongoing asset management fee, billed quarterly in advance, is the most common method of payment for the client and compensation to Widmann Financial Services and the advisor. In some cases, the annual account fee may be payable monthly in advance, and certain managed account programs charge fees in arrears or will have differing methods of fee calculation. Please refer to the respective program description in this Brochure, to the respective client agreement, and to the respective TPAM Program Brochure (if applicable) for specific information about the maximum fee allowed, the varying fee schedules of each program, and the methods of fee billing for the program(s) you select.

Clients should be aware that, when assets are invested in shares of mutual funds, variable insurance products, and certain alternative investments within a managed account program, clients will pay investment advisory fees to Widmann Financial Services and to the advisor for their advisory services in connection with the investments. In addition to the payments received by Widmann Financial Services and the advisor, clients will also pay management fees, mutual fund and money market 12b-1 fees, subtransfer agent fees, mutual fund and money market administrative expenses, mutual fund transaction fees, certain deferred sales charges and redemption fees on previously purchased mutual funds, annuity internal expenses and fees, and other fees charged by the investment company, insurance product, or alternative investment sponsor, which are typically charged to clients as an internal expense of the product. These internal expenses are described in the prospectus or offering document for the specific product. Clients may be able to invest directly in the investment company, insurance product, or alternative investment without incurring the investment advisory fees, platform fees, or transaction charges assessed by Widmann Financial Services or their advisor. If a client's assets are invested in a fee-based annuity, the client will pay both the direct management fee to Widmann Financial Services and their advisor for the advisory services provided by Widmann Financial Services and the advisor in connection with that investment and, indirectly, the management and other fees charged by the underlying annuity investment options, as well as the charges assessed by the insurance company for the product. Of course, clients should also be aware of the tax implications of investing, as well as of the existence of deferred sales charges or redemption fees charged by some product sponsors for positions the client subsequently sells in Widmann Financial Services managed accounts.

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

Widmann Financial Services does not charge performance-based fees and therefore does not engage in side-by-side management.

Item 7 Types of Clients

The advisory services offered by Widmann Financial Services are geared toward individuals and their families including high-net-worth individuals, as well as businesses, charitable organizations, trusts, and estates.

The minimum account size to obtain asset management services is generally \$250,000. We will group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee. Accounts below these minimums will be accepted on an individual basis at our discretion. Such circumstances include but are not limited to the addition of assets to your account in the near future, or the fact that you have other accounts under management with Widmann Financial Services. You should be aware that performance may suffer due to difficulties with diversifying smaller accounts and that a lack of diversification can lead to greater portfolio risk. Performance of smaller accounts may vary from the performance of accounts with more dollars invested because fluctuations in the market may affect smaller accounts more.

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

A. Widmann Financial Services uses third party research to include, but not be limited to, firms such as Morningstar, Argus, Standard & Poor's, and Valueline. We base our investment decisions on a detailed, research-based analysis, and our investment philosophy focuses on opportunities where we can maximize value over a long-term horizon. Widmann Financial Services relies on both quantitative and qualitative data derived from a series of analyses, the underlying methodologies of which can loosely be described as derivatives of Modern Portfolio Theory ("MPT"). The firm's hybrid approach is largely based on quantitative, qualitative and/or academic research metrics that incorporate both historical data points and current market observations in relation to a client's total balance. MPT is a mathematical based investment discipline that seeks to quantify expected portfolio returns in relation to corresponding portfolio risk. However, MPT disregards certain investment considerations and is based on a series of assumptions that may not necessarily reflect actual market conditions. As such, the factors for which MPT do not account (e.g., tax implications, regulatory constraints and brokerage costs) may negate the upside or add to the actual risk of a particular allocation. Nonetheless, the firm's investment process is structured in such a way as to integrate those real-life considerations for which MPT analytics do not account.

B. Investing in securities involves risk of loss, including the potential loss of the principal money you are investing. Therefore, your participation in any of the management programs offered by Widmann Financial Services requires you to be prepared to bear the risk of loss as well as the fluctuating performance of your accounts. Market values of investments will always fluctuate based on market conditions.

We do not represent, warrant, or imply that the services or methods of analysis we use can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Widmann Financial Services or our Advisory Representatives will provide a better return than other investment strategies.

C. Widmann Financial Services generally uses mutual funds, ETFs, stocks and bonds in our portfolios. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers and/or the fund straying from its stated investment objective. Open-ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus. A prospectus is available online at each mutual fund company's website. At the client's request, we will direct the client to the appropriate web page to access the prospectus.

The risks with ETFs include the fact that actively traded ETFs can create increased trading expenses and fees and the intraday trading opportunities created by ETFs may not fit into a long-term investor's strategy. In addition, an ETF more heavily weighted towards a particular market sector may be more volatile over short and long periods of time than a more broadly diversified ETF.

Variable annuities are long-term investments and are generally not suitable for meeting short-term financial goals because substantial taxes and insurance company charges typically apply if a client withdraws money early. Variable products are not suitable if you anticipate the need to access the principal to pay for living expenses or health care during the surrender period. Variable annuities are subject to investment risks, including possible loss of the principal amount invested. Subaccount values fluctuate. Any guaranteed rate option available under the contract may be subject to a market value adjustment, which may increase or decrease your available account value if funds are withdrawn, transferred, or annuitized during the guarantee period. If you withdraw money during the early years of the contract, the issuing insurance company may retain a certain percentage of the amount you withdraw, known as a surrender charge or contingent deferred sales charge (CDSC). Many deferred variable annuities limit the amount that

can be withdrawn each year without penalty. Withdrawals from annuities are taxed as ordinary income rates. Withdrawals made prior to age 59 1/2 may be subject to a 10-percent tax penalty. In addition, surrender charges may apply to amounts distributed under IRS minimum distribution requirements beginning at age 72 for qualified plans. The tax-deferred features of an annuity are redundant if the product is purchased in a retirement account [e.g., IRA, 401(k), 403 (b)]. Any death benefit may terminate upon the owner reaching a specific age. Bonus annuities, as opposed to non-bonus annuities, provide for additional contributions to the contract on your behalf and generally result in higher fees and expenses and longer surrender periods over the life of the contract.

When appropriate, Advisory Representatives, in their capacity as Registered Representatives of Commonwealth, recommend alternative investments to clients who meet the suitability requirements. Such investments are often referred to as non- publicly traded real estate investment trusts (REITs), private placements, limited partnerships or direct participation programs. These investments generally have no or limited secondary market and are considered illiquid and long term. Further, clients must meet suitability requirements as outlined in the product's offering memorandum. Because of the illiquidity of the investment and the type of investment, these products are considered risky. Values reflected on statements or reports issued by Widmann Financial Services are received directly from the alternative investment company and reported to Widmann Financial Services through an outside vendor. It is important to understand that although values are reported on a statement, it does not mean the client can liquidate the investment and receive the stated value. As previously noted and restated for emphasis, these products are generally illiquid with minimal to no secondary market. Furthermore, the products generally pay a higher commission than other products. This is a conflict of interest. To mitigate this conflict of interest, this disclosure is provided. Some alternative investment sponsors now offer an adviser class product for which no commissions are paid. If such product is purchased in an advisory account, Widmann Financial Services will charge an ongoing advisory fee on those assets.

It is important to refer to the information about mutual funds and registered investment companies disclosed above in Item 4. As previously stated, registered investment companies offer their shares in various share classes. The share classes have differing fee structures. Some share classes pay trail compensation or 12b-1 fees. There is a conflict of interest for Advisory Representatives to offer share classes that pay a commission and/or trail compensation in advisory accounts. To the best of our knowledge, the lowest cost share class is an institutional share class. However, trading costs are, at times, higher with institutional shares since there is no compensation paid to the Advisory Representative or the broker-dealer to help offset the trading costs. Active trading and systematic investments or withdrawals will increase the costs to the client when using institutional share classes.

When Widmann Financial Services and its Advisory Representatives, in the past or currently, select mutual fund share classes that charge 12b-1 fees where clients may be eligible for lower cost share classes of the same fund, 12b-1 fees that are paid to Commonwealth are thereafter credited back to the managed account. There may be instances where the lowest share class available pays a 12b-1 fee that is not payable to Commonwealth.

Additional risks (but not all risks) are described below:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.

- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that Widmann Financial Services may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. Widmann Financial Services endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Risks specific to private placements, sub-advisors and other managers.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short-term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.
- **Concentration Risk.** While Widmann Financial Services selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.
- **Transition Risk.** As assets are transitioned from a client's prior advisers to Widmann Financial Services there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the

portfolio into the asset allocation strategy selected by Widmann Financial Services. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Widmann Financial Services may adversely affect the client's account values, as Widmann Financial Services' recommendations may not be able to be fully implemented.

- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.
- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.
- **Interest Rate Risk.** The chance that bond prices will decline because of rising interest rates. Longer term bonds are more susceptible to interest rate risk than shorter term bonds.
- **Call Risk.** The chance that during periods of falling interest rates issuers of callable bonds may call (redeem) securities with higher coupon rates or interest rates before their maturity dates. This forces the reinvestment of the unanticipated proceeds at a potentially lower interest rate.
- **Excess Cash Balance Risk.** Client accounts may have cash balances in excess of \$250,000, which is the insurance limit of the Federal Deposit Insurance Corporation. For cash balances in excess of that amount, there is an enhanced risk that operation related counterparty risk related to the account custodian could cause losses in the account. We mitigate this risk by carrying cash balances in amounts either subject to protection or as limited as you, the client, directs. You may elect to participate in a "cash sweep" program through your account custodian which automatically moves excess cash from your investment account into a cash account and then invests that cash into cash-based investments, such as money market funds. We do not receive compensation of any kinds for facilitating your participation in such cash sweep accounts.
- **Market Disruption, Health Crisis, Terrorism and Geopolitical Risk.** Investments are subject to the risk that war, terrorism, global health crises or similar pandemics, and other related geopolitical events increase short-term market volatility and may have adverse long-term effects on world economics and markets generally. These risks have previously led and may lead in the future to adverse effects on the value of client's investments.
- **Margin transactions:** Securities transactions in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan, inherently have more risk than cash purchases. If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk in accounts utilizing margin includes the amount of money invested plus the amount that was loaned to them.

Item 9 Disciplinary Information

Registered Investment Advisers must disclose any legal or disciplinary events that would be material to your evaluation of Widmann Financial Services or the integrity of our management. There is no reportable disciplinary information required for Widmann Financial Services or its management persons.

Item 10 Other Financial Industry Activities and Affiliations

A&B. Widmann Financial Services does not have a related person who is a broker-dealer or other similar type of broker or dealer, investment company or other pooled investment vehicle, other investment adviser

or financial planner, futures commission merchant or commodity pool operator, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, or sponsor or syndicator of a limited partnership.

C. As previously stated, Advisory Representatives are separately registered as Registered Representatives and Advisory Representatives of Commonwealth Financial Network® ("Commonwealth"). You are under no obligation to purchase or sell securities through them. However, if you choose to implement the planning recommendations in our role as a Registered Representative and/or insurance agent, commissions and/or advisory fees will be earned in addition to any fees paid for our planning services. Commissions may be higher or lower at Commonwealth than at other broker-dealers. Our Advisory Representatives who are Registered Representatives and insurance agents, have a conflict of interest in having you purchase securities and/or insurance-related products through Commonwealth in that the higher their production with Commonwealth, the greater potential for obtaining a higher pay-out on commissions earned. NOTE: No commissions will be charged on assets under our Asset Management Services.

It is important to understand investment advisers have a fiduciary obligation to provide advice and services through the investment adviser that are in the best interest of the client. However, when Advisory Representatives act in the capacity of a Registered Representative, their regulatory obligation is to make recommendations and conduct transactions that are suitable for you but may not rise to the fiduciary standard.

Advisory Representatives are separately registered as Registered Representatives of Commonwealth. Pursuant to the requirements of FINRA Conduct Rule 3040, Commonwealth is responsible for supervising the securities business of Advisory Representatives when they act in the role of a Registered Representative. Commonwealth is not responsible for supervising the provision of financial planning services to the clients of Widmann Financial Services. Instead, it oversees the implementation of the financial planning recommendations by Advisory Representatives in their role as Registered Representatives and/or Advisory Representatives of Commonwealth.

Advisory Representatives may also be licensed with various insurance companies. The insurance business represents a small part of their total activities and they do not concentrate resources in this area. However, Advisory Representatives will earn commissions if you purchase insurance products through them in their role as an insurance agent. This creates a conflict of interest. You are under no obligation to purchase insurance products or services through our Advisory Representatives. Clients have the right to decide whether or not to purchase insurance products and which insurance professionals to use.

Widmann Financial Services attempts to mitigate conflicts of interest by notifying you of these conflicts in our disclosure document and agreement. We inform you that you are free to consult other financial professionals and that you may implement recommendations through these professionals. We are bound by our Code of Ethics to act in an ethical manner.

Further, our advisors are restricted to only offering those products and services that have been reviewed and approved for sale to the public through Commonwealth pursuant to Commonwealth policy. Widmann Financial Services and its Advisory Representative are not actively engaged in any other financial industry entity.

D. Widmann Financial Services does not recommend the services of a Third-Party Manager.

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

Code of Ethics

A. Widmann Financial Services has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Widmann Financial Services takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as our policies and procedures. Further, we strive to handle your non-public information in such a way to protect information from falling into the hands of anyone who has no business reason to know such information. We provide you with our Privacy Policy that details our procedures for handling your personal information. Widmann Financial Services maintains a Code of Ethics for its Advisory Representatives, supervised persons, and office staff. The Code of Ethics contains provisions for standards of business conduct to comply with Federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, our Code of Ethics establishes our firm's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

B. Neither Widmann Financial Services nor its associated persons recommend to clients or buys or sells for client accounts any securities in which we have a material financial interest.

C/D. Widmann Financial Services and its associated persons may buy or sell securities identical to those securities recommended to you at or around the same time such securities are purchased for clients. Therefore, Widmann Financial Services and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. They will not put their interests before your interest. Neither Widmann Financial Services nor any associated person may trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients. No affiliated person may trade in a client's account in such a way as to disadvantage any client.

Widmann Financial Services is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline to implement any investment recommendation. Widmann Financial Services and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

Item 12 Brokerage Practices

A. As previously stated, Widmann Financial Services' Advisory Representatives are Registered Representatives of Commonwealth. As a result, they are subject to FINRA Conduct Rule 3040, which restricts them from conducting securities transactions away from Commonwealth unless Commonwealth provides them with written authorization. Therefore, if you elect to implement investment recommendations through them, you will need to establish an account with Commonwealth.

Not all investment advisers require you to maintain accounts at a specific broker-dealer. You may maintain accounts at another broker-dealer. If you choose to do so, the services provided by our Advisory Representatives will be limited to investment advice only and will not include implementation.

In initially selecting Commonwealth, Widmann Financial Services conducted due diligence. We examined

the ability to service you, staying power as a company, industry reputation, reporting ability, trading platform, products and services available, technology resources, and educational resources. We consider Commonwealth's commissions to be reasonable in comparison to the value provided although they may be higher or lower as compared to online or discount broker-dealers. And the fact that Commonwealth does not have any proprietary products was also a consideration.

Periodically, we will review alternative broker-dealers and custodians in the marketplace to ensure Commonwealth and its custodians are meeting our duty to provide best execution for your accounts. The review will include a comparison to Commonwealth that involves evaluating criteria such as overall expertise, cost competitiveness, and financial condition. The quality of execution by Commonwealth will be reviewed through trade journal evaluations. However, best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the current custodian.

Additionally, some product sponsors such as variable annuity and investment companies and limited partnerships provide support to Widmann Financial Services and its Advisory Representatives. Such support includes research, educational information, and monetary support for due-diligence trips and client events. We receive a benefit because we do not have to pay for the research, products, or services. This additional compensation presents a conflict of interest because Widmann Financial Services or your Advisory Representative has a greater incentive to make available, recommend, or make investment decisions regarding investments for your account that provide such additional compensation to your Advisory Representative or Widmann Financial Services. Further information regarding fees and charges assessed to you by investment products you purchase is available in the appropriate product prospectus, statement of additional information, and/or offering document.

There is an incentive for Widmann Financial Services and our Advisory Representatives to recommend Commonwealth over other broker-dealers based on the access to products and services that we will receive.

Commonwealth has a wide range of approved securities products for which Commonwealth performs due diligence prior to selection. As Commonwealth Registered Representatives, we are required to adhere to these products when implementing securities transactions through Commonwealth.

Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker-dealer. Commonwealth also provides Advisory Representatives, and therefore Widmann Financial Services, with back-office, operational, technology, and other administrative support. Other services may include consulting, publications, and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. Such services are intended to help us, and our Advisory Representatives manage and further develop its business enterprise.

Commonwealth and its clearing broker-dealer, National Financial Services, LLC, make available to Widmann Financial Services other products and services that benefit us but do not directly benefit you. Some of these other products and services assist us with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information, and other market data; facilitate payment of our advisory fees from your accounts; and assist with back-office functions; recordkeeping; and client reporting. Many of these services generally may be used to service all or a substantial number of Widmann Financial Services clients, including clients who do not maintain accounts at Commonwealth.

B. Due to the individual management of client accounts, we do not generally aggregate the purchase or

sale of securities for various client accounts.

Products and Services Available to Us from Commonwealth and Our Custodians

Commonwealth Financial Network provides Widmann Financial Services with various products and services that enable us to both serve our clients and grow our business. Commonwealth (through their disclosed clearing relationships with National Financial Services and Pershing) provide us and our clients with access to its brokerage services— trading, custody, reporting, and related services. Commonwealth also makes available various support services. Some of those services help us manage or administer our client accounts, while others help us manage and grow our business. Following is a more detailed description of Commonwealth's support services:

Services That Benefit You

Commonwealth's brokerage services include access to a broad range of investment products, execution of securities transactions by Commonwealth's clearing firms, and custody of client assets via their clearing firms. The investment products available through Commonwealth include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Services That Do Not Directly Benefit You

Commonwealth also makes available to us other products and services that benefit our firm and our advisors but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Commonwealth's and that of third parties. We use this research to service substantially all our client accounts, including accounts not maintained at Commonwealth. In addition to investment research, Commonwealth also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution
- Provide pricing and other market data
- Facilitate payment of our fees from our client accounts
- Assist with back-office functions, recordkeeping and client reporting

Services That Generally Benefit Only Us

Commonwealth also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Complementary or discounted attendance at conferences and events
- Consulting on technology, compliance, legal and business needs
- Publications and conferences on practice management and business succession

Our Interest in Commonwealth's Services

Our relationship with Commonwealth requires that we maintain a certain level of assets within Commonwealth's PPS program and/or our own asset management program. This creates an incentive to recommend that you establish and maintain your account with Commonwealth, based on our interest in receiving Commonwealth's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. To mitigate the conflict, this disclosure is provided to you. As a fiduciary, we must act in your best interests. We believe that our selection of National Financial Services or Pershing (via Commonwealth) as custodian and broker is in the best interests of our clients and conduct regular reviews of our relationship with Commonwealth to ensure this remains the case. Our choice to maintain a relationship with Commonwealth is primarily supported by the scope, quality, and price of Commonwealth's

services (see “How We Select Brokers/Custodians”) and not Commonwealth’s services that benefit only us.

Soft Dollars

Widmann Financial Services does not use commissions to pay for research and brokerage services (i.e., soft dollar transactions). Research, along with other products and services other than trade execution, are available to Widmann Financial Services on a cash basis from various vendors.

Core Account Sweep Programs (“CASPs”)

The Core Account Sweep Programs (“Program(s)”) are the core account investment vehicles for eligible accounts used to hold cash balances while awaiting reinvestment. The Bank Deposit Sweep Program (“BDSP”) is the core account investment vehicle for eligible brokerage accounts and advisory non-retirement accounts. The Advisory Retirement Sweep Program (“ARSP”) is the core account investment vehicle for eligible advisory retirement accounts. The cash balance in your eligible accounts will be deposited automatically or “swept” into interest-bearing FDIC-insurance eligible Program deposit accounts (“Deposit Accounts”) at one or more FDIC-insured financial institutions (“Program Banks”). The interest rates for your Deposit Accounts may be obtained from Widmann Financial Services, your advisor, or at www.commonwealth.com/clients/deposit-sweep-program.aspx. Specific features and account eligibility of CASP are further explained in the Disclosure Document provided to clients that participate in CASP. A current version of the CASP Disclosure Document is available at www.commonwealth.com/clients/media/BankSweepDisclosureDocument.pdf.

Clients should note that, though the default options for cash held in accounts are the core account investment vehicles, clients may at any time seek higher yields in other available investment options.

Commonwealth receives fees for its services in administering CASP, as described below, and these fees create conflicts of interest and substantial financial benefits for Commonwealth. For example, the fees paid to Commonwealth for CASP reduce the interest rate paid to clients on their cash balances. The fee revenue generated by Commonwealth for one sweep option will vary compared with revenues generated for other sweep options or possible core account investment vehicles that we have used in the past or may consider using in the future. The Programs are generally more profitable to Commonwealth than other available sweep options, if any. Advisors do not receive any of the fees received by Commonwealth. Depending on interest rates and other market factors, the yields you receive on CASP may be lower than the aggregate fees received by Commonwealth for your participation in the CASP. In addition, Commonwealth financially benefits from the possession and temporary investment of cash balances prior to the deposit of such balances in a core account investment vehicle. In addition to the CASP fees described below, advisory accounts are charged investment advisory fees based on the assets held in and services offered to advisory accounts. Except as may be agreed between you and your Advisor, cash balances in CASP, from which Commonwealth receives fees that reduce the interest rate paid to you on your cash balances, are included in the value of account assets Commonwealth uses to calculate the management fees and other asset-based fees charged to your advisory accounts.

The Program Banks use Program Deposits to fund current and new lending and for investment activities. The Program Banks earn net income from the difference between the interest they pay on Program Deposits and the fees paid to us and the income they earn on loans, investments, and other assets. As noted above, the Program Banks may pay rates of interest on Program Deposits that are lower than prevailing market interest rates that have been paid on accounts otherwise opened directly with the Program Bank. Program Banks do not have a duty to provide the highest rates available and may instead seek to pay a low rate. Lower rates will be more financially beneficial to a Program Bank. There is no necessary linkage between bank rates of interest and the highest rates available in the market, including any money market mutual fund rates. By comparison, a money market mutual fund generally seeks to

achieve the highest rate of return (less fees and expenses) consistent with the money market mutual fund's investment objective, which can be found in the fund's prospectus.

BDSP. The Program creates substantial financial benefits for Commonwealth because Commonwealth receives a fee from each Program Bank in connection with the Program (equal to a percentage of all participants' average daily deposits at the Program Banks). Prior to June 9, 2023, amounts will vary but in no event will they be more than 2.5% on an annualized basis (trailing 12 months) as applied across all Deposit Accounts in BDSP. Effective June 9, 2023, amounts will vary but in no event will they be more than an amount equal to the Fed Funds Effective Rate (FFER) plus 25 basis points (bps) on an annual basis (trailing 12 months) across all Deposit Accounts in BDSP. At its discretion, Commonwealth may reduce or raise fees and vary the amount of the reductions between clients based on market conditions. Although the fees vary from Program Bank to Program Bank, the Program pools all fees in an effort to treat clients equally, regardless of in which individual bank clients' funds may be deposited. The fee amount received will reduce the interest rate paid to clients by the Program Bank. Commonwealth reserves the right to modify the fees Commonwealth receives from Program Banks. From time to time, if the fee increases, you will receive notification of any such change. In addition to our fees, the program administrator will receive fees from each Program Bank (collectively, with the fees paid to us and/or NFS, "Program Fees").

ARSP. Commonwealth receives fees for services in connection with maintaining and administering ARSP, and therefore, ARSP provides substantial financial benefits to Commonwealth. The account interest received will be the net of the gross interest paid by the Program Banks, less the fees paid to the Program administrator, NFS, and Commonwealth. Commonwealth's fees are based on a fixed formula and vary based on factors such as the Federal Funds Effective Rate ("FFER"), total assets in advisory accounts participating in ARSP, and the number of accounts in ARSP. Commonwealth's fee will be the sum of two fees: (i) a variable fee ("Variable Fee"), and (ii) a per-account fee ("Account Fee"). The Variable Fee is calculated according to a formula that is based on a variable fee rate ("Variable Fee Rate") applied to a fixed representation (4%) of cash balances ("Representative Amount") of total assets in accounts participating in ARSP. The Variable Fee Rate is based on FFER. When FFER is 1%, the Variable Fee Rate is 95 basis points. As FFER increases above 1%, the Variable Fee Rate is 95 basis points plus 30% of the change in the underlying market interest rate as measured by FFER. When FFER declines below 1%, the Variable Fee Rate is 95 basis points minus the percentage point difference between 1% and FFER. The minimum Variable Fee Rate applied is 15 basis points (0.15%). Commonwealth reserves the right to temporarily reduce or waive this minimum variable fee at any time. Prior to June 9, 2023, amounts will vary, but in no event will the Variable Fee be more than an average of 2.5 % the Representative Amount on an annualized basis (trailing 12 month). . Effective June 9, 2023, amounts will vary, but in no event will they be more than an amount equal to FFER plus 25 basis points on an annual basis (trailing 12 months) across the Representative Amount. This maximum Variable Fee does not include the Account Fee. Commonwealth's fees under ARSP are not affected by the actual amounts held in the Deposit Accounts but will vary with the FFER. The current FFER can be found at www.federalreserve.gov/monetarypolicy/openmarket.htm. The Account Fee is \$1 per account each month and applied when the average monthly FFER from the prior month exceeds 1.10%.

NTF Program

Additionally, NFS offers an NTF program composed of no-load mutual funds. Participating mutual fund sponsors pay a fee to NFS to participate in this program, and a portion of this fee is shared with Commonwealth. None of these additional payments is paid to Widmann Financial Services or any advisors who sell these funds. NTF mutual funds may be purchased within an investment advisory account at no charge to the client. Clients, however, should be aware that funds available through the NTF program often contain higher internal expenses than mutual funds that do not participate in the NTF program. Commonwealth's receipt of a portion of the fees associated with the NTF program creates a conflict of interest because Commonwealth has an incentive to make available those products that provide such

compensation to NFS and Commonwealth over those mutual fund sponsors that do not make such payments to NFS and Commonwealth. While Widmann Financial Services does not receive additional compensation from NFS or Commonwealth based on the particular investment (potentially including one or more NTF funds), Widmann Financial Services' menu of investment options is limited to investments made available by Commonwealth. Thus, clients may be impacted by the conflict of interest previously described in this paragraph. As stated previously, Widmann Financial Services regularly evaluates our relationship with Commonwealth to ensure it remains appropriate for the firm and our clients. The investment advisory services provided by Widmann Financial Services may cost the client more or less than purchasing similar services separately. Clients should consider whether the appointment of Commonwealth as the sole broker/dealer may result in certain costs or disadvantages to the client as a result of possibly less favorable executions.

Item 13 Review of Accounts

A. The investments within the Asset Management Services accounts are monitored on a quarterly basis. Additionally, these accounts are reviewed at least annually by your Advisory Representative. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. A review may also be triggered by material changes in variables such as the client's individual circumstances, or the market, political, or economic environment. You must notify your Advisory Representative promptly of any changes to your financial goals, objectives, or financial situation as such changes may trigger a review of the portfolio allocation and recommendations for changes.

Upon completion of your financial planning/consulting services, your Advisory Representative will meet with you to review and answer any questions you have. After this consultation, there are no further reviews unless requested. You must notify your Advisory Representative promptly of any changes to your financial goals, objectives, or financial situation as such changes may require your Advisory Representative to review your plan and make amendments.

B. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

C. The custodian will provide you with confirmations of each transaction in your account and quarterly statements. Upon request, you can receive quarterly performance reports reflecting the holdings in your account, the value of the securities, and the performance of the account. You should compare the report with statements received directly from the account custodian. If there is any discrepancy, the account custodian's report will prevail. Financial planning/consulting clients will receive recommendations from their Advisory Representative. Typically, there will be no written reports issued. Generally, all recommendations will be made and discussed with you during our meetings.

Item 14 Client Referrals and Other Compensation

A. Widmann Financial Services receives an economic benefit from Commonwealth in the form of the support, products and services Commonwealth makes available to Widmann Financial Services and other investment advisors whose clients maintain their accounts on Commonwealth's platform. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 of this brochure. Some product vendors recommended by Widmann Financial Services provide monetary and non-monetary assistance with client events and provide educational tools and resources. We do not select products as a result of any monetary or non-monetary assistance. The selection of product that is most appropriate for the client is first and foremost. Our due diligence of a product does not take into

consideration any assistance we receive. Although the receipt of products or services is a benefit for you and us, it also presents a conflict of interest.

As discussed previously, our Advisory Representatives are Registered Representatives and Advisory Representatives of Commonwealth. This affiliation requires us to only offer you services and programs sponsored or approved by Commonwealth. Commonwealth offers our Advisory Representatives educational, training, and other programs if they meet certain sales production goals. This includes the payment or reimbursement of travel, meals, and lodging expenses for attendees. Payment/reimbursement of expenses is not contingent upon sales targets or contests, but rather on the total amount of production. This additional compensation presents a conflict of interest because Widmann Financial Services or your Advisory Representative has a greater incentive to make available, recommend, or make investment decisions regarding investments for your account that enable our Advisory Representatives to meet the production goals noted above. Further information regarding fees and charges assessed to you by investment products you purchase is available in the appropriate product prospectus, statement of additional information, and/or offering document.

If you have any concerns about the appropriateness of the recommendations provided by your Advisory Representative, you should discuss this with your Advisory Representative. As well, you are free to consult other financial professionals.

Although our securities sales are reviewed for suitability by an appointed supervisor, you should be aware of the incentives we have to sell certain securities products and are encouraged to ask us about any conflict presented.

Widmann Financial Services attempts to mitigate the conflicts of interests presented in this section by notifying you in our disclosure document and agreement of the conflicts and informing you that you are free to decline our recommendations and to consult other financial professionals. We are bound by our Code of Ethics and fiduciary duty to act in an ethical manner and place your interests first and foremost.

B. Widmann Financial Services does not directly or indirectly compensate any person or entity that is not a supervised person of our firm for client referrals.

Item 15 Custody

Widmann Financial Services does not maintain physical custody of your assets. Under SEC rules we are deemed to have custody of your assets if you authorize us to instruct your account custodian to deduct our advisory fees directly from your account, or if you provide us with authorization to transfer funds from your account to a third party. Widmann Financial Services maintains a relationship with Commonwealth who, as described previously in this brochure, maintains a primary clearing relationship for the execution of client transactions with NFS as the account custodian, and a secondary clearing relationship for the execution of client transactions with Pershing as the account custodian. Substantially all of our advisory clients must select Commonwealth as the broker/dealer of record and NFS as the clearing firm for their managed accounts. In all cases, the name and address of the account custodian will be identified in the respective managed account client agreement. Clients who establish a managed account with Widmann Financial Services utilizing Commonwealth as the broker/dealer of record will receive custodial account statements directly from the respective custodian that holds those assets. Clients should carefully review the statements they receive from their account custodians and should promptly report material discrepancies to Widmann Financial Services.

Widmann Financial Services clients may also receive portfolio summary or performance reporting for their managed accounts from Widmann Financial Services or their advisor that are in addition to the account statements clients receive directly from the respective account custodian. Widmann Financial Services

urges you to compare the account statements you receive from your account custodian with any account summary statements or reports you receive from us or your advisor. Although account holdings and asset valuations should generally match, for purposes of calculating performance and account valuations on your account, our summary or performance reporting month-end market values sometimes differ from custodial account statement month-end market values. The three most common reasons why these values may differ are differences in the manner in which accrued interest is calculated, the date upon which “as of” dividends and capital gains are reported, and settlement date versus trade date valuations.

Item 16 Investment Discretion

By execution of our advisory agreement, you will grant Widmann Financial Services authorization to manage your account on a discretionary basis. We will have the authority to determine, without obtaining specific client consent, the securities to be bought or sold and the amount of the securities to be bought or sold. You may terminate the discretionary authorization at any time by giving us written notice.

Additionally, you are advised that:

1. You may set parameters with respect to when your account should be rebalanced and set trading restrictions or limitations.
2. Your written consent is required to establish any mutual fund, variable annuity, or brokerage account.
3. If you elect to implement recommendations through your Advisory Representative, we require the use of Commonwealth, the broker-dealer with which our Advisory Representative is registered for sales in commissionable mutual funds or variable annuities.

Item 17 Voting Client Securities

Widmann Financial Services does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact your Advisory Representative about questions you may have and opinions on how to vote the proxies. However, the decision to vote and how you vote the proxies is solely up to you.

Item 18 Financial Information

- A. Widmann Financial Services will not require you to prepay more than \$1,200 and 6 or more months in advance of receiving the advisory service; therefore, a balance sheet is not required to be attached.
- B. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.
- C. Widmann Financial Services has not been the subject of a bankruptcy petition.