

# Form ADV Part 2A Brochure

OWLFI RIA, LLC

8725 Rosehill, Suite 119

Lenexa, KS 66215

(913) 441-8380

March 28, 2024

This Brochure provides information about the qualifications and business practices of OWLFI RIA, LLC. If you have any questions about the contents of this Brochure, please contact us at (913) 441-8380. 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.

OWLFI RIA, LLC is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information from which you can determine whether to hire or retain an adviser.

Additional information about the firm is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with the firm who are registered as investment adviser representatives of the firm.

## **Item 2 – Material Changes**

This Brochure dated March 28, 2024, represents an amendment to the Brochure for OWLFI RIA, LLC (OWLFI).

Since the annual update Brochure dated March 21, 2023, subsequently amended April 24, 2023 May 17, 2023, October 16, 2023, and December 15, 2023, we have various made minor updates but no material changes were made to the Brochure.

Pursuant to regulatory requirements, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at (913) 441-8380. Additional information about the firm is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with the firm who are registered as investment adviser representatives of the firm.

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#### **Item 4 – Advisory Business**

OWLFI RIA, LLC (OWLFI) (CRD # 311854) is registered as an investment adviser with the state of Kansas. OWLFI is based in Kansas and is organized as a limited liability company under the laws of the State of Kansas.

OWLFI's principal office and place of business is located at 8725 Rosehill, Suite 119, Lenexa, KS 66215. Regular business hours are 8:00am to 5:00pm Monday through Friday. The firm can be contacted by phone at (913) 441-8380. The firm also has branch offices in Oklahoma, Florida, and Utah.

OWLFI is owned by OWLFI, Inc. (a tax entity owned by Elliot Omanson).

OWLFI is managed by Elliot Omanson (OWLFI's Chief Executive Officer), Kelly Klusman (OWLFI's Chief Financial Officer), Mark Stratton (OWLFI's Chief Investment Officer and Chief Compliance Officer), and Elizabeth Floyd (OWLFI's Chief Operating Officer).

OWLFI provides ongoing discretionary portfolio management services to individuals, families and businesses. When providing portfolio management services, the firm not only makes recommendations related to investments, but also implements these recommendations and provides ongoing monitoring and reporting. In some cases, the firm may delegate certain investment management responsibilities to outside managers.

OWLFI also provides non-management investment advisory services to individuals, families and businesses where the firm makes ongoing investment recommendations but the client is responsible for determining whether or not to implement recommendations, and if they decide to do so, are responsible for actual implementation.

Additionally, the firm provides project oriented and ongoing financial planning services to individuals and families where the firm offers advice or other strategic assistance in areas such as education funding, retirement planning, estate planning, risk management, employee benefits planning, tax planning, etc. The firm also provides general consulting services. When engaged to provide financial planning or general consulting assistance, clients are responsible for determining whether or not to implement a recommendation, and if they decide to do so, are responsible for implementation. The details of an engagement vary on a case by case basis depending on the complexity of the client's financial situation. Generally however a financial planning engagement involves identification of goals and objectives, collection and analysis of

data, formulation of a strategy, and preparation of a written plan. A general consulting engagement is customized to the needs of the client.

OWLFI also provides retirement plan services to businesses which may include plan level services such as discretionary management services, non-discretionary management services, and investment advisory services related to different types of retirement plans. When providing management services, the firm is responsible for implementing recommendations. When the firm is providing advisory services, the client is responsible for implementation of recommendations.

Regardless of the services provided, each is tailored to the individual needs of a particular client (whether an individual, a family, or a business) through an assessment conducted prior to an engagement. Clients may impose restrictions related to the level of discretion granted, the types of investments used, etc. Terms of an actual engagement, including description of service, limitations and restrictions, fees, etc., are all detailed before any engagement begins in a written client agreement.

Because OWLFI is a registered investment adviser, we are required to meet certain fiduciary standards when providing investment advice to clients. Additionally, when we provide investment advice related to a retirement plan account or an individual retirement account, we are considered 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. As such, we are required to act in your best interest and not put our interest ahead of yours, even though our compensation creates some conflicts with your interests in that the more you have us manage, the more we can earn. Our clients however are under no obligation to use services recommended by our associated persons. Furthermore, we believe that our recommendations are in the best interests of our clients and are consistent with our clients' needs.

As of December 31, 2024, the firm had \$125,134,119 in assets under management, all of which was managed on a discretionary basis.

## **Item 5 – Fees and Compensation**

### **Investment Management Services**

Fees charged for discretionary investment management services are negotiated prior to the engagement at a rate not to exceed 2.0%.

Fees are generally calculated and charged monthly in arrears based on the period ending balance of assets under management at the end of the service month. Fees for partial months are prorated based on the number of days assets are under management. Fees are generally deducted directly from client accounts, but clients may elect to alternatively pay fees by check.

Services may be terminated at any time by either party with 30 days written notice to the other party, and fees will be prorated accordingly.

All management fees paid to the firm are separate and unrelated to any fees or expenses assessed by mutual funds or exchange traded funds, or to any trade commission charged by an account custodian, although trade commissions may at times be paid by the firm at the firm's discretion. Information pertaining to fund-generated fees and expenses can be found in mutual fund and exchange traded fund prospectuses.

### **Investment Advisory Services**

Fees charged for advisory services may be charged in advance or in arrears depending on the service provided. Fees are negotiated in advance, and generally range from 0.25% to 1.00% depending on the level of complexity of the engagement. Fee rates are based on actual services provided rather than being based on the level of assets managed as detailed above for investment management services.

In some cases, fees may be deducted directly from client accounts, but clients generally are billed directly on a quarterly basis.

Services may be terminated at any time by either party with 30 days written notice to the other party, and fees will be prorated accordingly. Any payments made in advance will be prorated and refunded to the client.

All advisory fees paid to the firm are separate and unrelated to any fees or expenses assessed by any broker, custodian, or other outside party.

## **Financial Planning and General Consulting Services**

Fees charged for project oriented financial planning services are quoted in advance and charged at a fixed amount or are quoted on an hourly basis. Quoted fixed fees will be based on the complexity and level of service provided on a case-by-case basis. Hourly fees will be estimated based on the complexity and level of service provided on a case-by-case basis and rates range from \$175 to \$350 per hour. As mentioned in Item 4 above, services may include planning in areas such as education funding, retirement planning, estate planning, risk management, employee benefits planning, tax planning, etc. Since each of these areas can vary in complexity depending on the complexity of the client's financial situation, cost will vary as well. Fees are negotiable depending on the circumstances of the engagement, location, etc. Fees may be billed in arrears or advance depending on the engagement. Should services be terminated prior to completion, any payments made in advance will be prorated based on the amount of work completed and any unearned fees will be refunded. Project financial planning fees can be paid by check or credit card.

Fees charged for ongoing financial planning services or for ongoing general consulting are quoted in advance as a fixed annual retainer fee based on the complexity and level of service provided on a case-by-case basis. Fees for ongoing financial planning for individuals are generally billed directly to the client and can be paid by check or credit card.

Services may be terminated at any time by either party with 30 days written notice to the other party, and fees will be prorated based on the degree to which services have been completed. Any payments made in advance will be prorated and refunded to the client.

All financial planning fees paid to the firm are separate and unrelated to any fees or expenses assessed by any broker, custodian, or other outside party (including affiliated companies), unless designated otherwise.

## **Retirement Plan Services**

Fees charged for retirement plan services may be charged in advance or in arrears depending on the service provided. Fees may be fixed or asset based (not to exceed 1.50% annually), and are negotiable depending on the complexity of the service. Fee levels (whether fixed or asset based) are primarily based on actual services to be provided.

Fees may be deducted directly from client accounts on a quarterly basis, or clients may elect to alternatively pay fees by check or wire transfer. There is a minimum annual fee of \$1,000 per plan.

Services may be terminated at any time by either party with 30 days written notice to the other party, and fees will be prorated accordingly. Any payments made in advance will be prorated and refunded to the client.

All retirement plan fees paid to the firm are separate and unrelated to any fees or expenses assessed by any broker, custodian, or other outside party.

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

OWLFI does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client), and consequently does not simultaneously manage performance based and non-performance based accounts.

#### **Item 7 – Types of Clients**

OWLFI provides services to individuals, businesses and retirement plans.

For its investment management services, OWLFI has a minimum account size of \$100,000 in assets for establishing or maintaining a client's account, but the firm reserves the right to waive account minimums at its discretion.

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

OWLFI's general investment strategy, consistent with the tenets of modern portfolio theory, is to attempt to reduce risk and volatility by building globally diversified portfolios. To implement this strategy, OWLFI primarily uses fundamental security methods of analysis, as well as market trend and economic cycle analysis. While mutual funds, stocks and exchange traded funds are the primary investment vehicles used in or recommended for client accounts, we may also use or recommend various other investment vehicles in the implementation of our strategies, including long-term purchases (securities held at least a year), short-term purchases (securities sold within a year), trading (securities sold within 30 days), margin and options.



Investing in securities involves risk of loss that clients should be prepared to bear. Such risks include market risk, interest rate risk, currency risk, and political risk, and loss of capital, among others. Additionally, certain trading strategies can affect investment performance through increased brokerage and other transactions. Each client's propensity for risk however is thoroughly evaluated, documented, and considered throughout the portfolio implementation process.

Although OWLFI intends to manage risk through the careful selection of investments, no investment strategy can assure a profit or avoid a loss.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of the firm or the integrity of its management. OWLFI is currently not subject to, nor has ever been subject to, any legal or disciplinary events of a material nature.

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

The firm has an affiliate, OWLFI Advisors, LLC, a separately owned legal entity established for providing non-investment ancillary services to OWLFI clients. OWLFI Advisors, LLC contracts with clients in the form of a retainer to coordinate services which may include accounting, tax, insurance, and estate services. OWLFI Advisors, LLC sub-contracts to outside providers for the provision of such services. Elliot Omanson, OWLFI's Chief Executive Officer, serves as the Managing Member of OWLFI Advisors, LLC.

The firm has another affiliate, OWLFI CPA LLC, a separate legal entity owned by Mr. Klusman, the firm's Chief Operating Officer, which provides accounting and tax services.

While OWLFI will endeavor to put the interest of clients first as part of its fiduciary duty, clients should be aware that the receipt of additional compensation creates a conflict of interest that may affect the judgment of individuals who make recommendations. We believe however that our

recommendations are in the best interests of our clients and are consistent with our clients' needs. Our clients are under no obligation to purchase products or services recommended by our associated persons.

OWLFI does not participate in any other financial industry activities and has no other financial industry affiliations.

## **Item 11 – Code of Ethics**

### **Trading Conflicts of Interest**

Individuals associated with OWLFI are permitted to buy or sell securities for their personal accounts identical to or different than those recommended to clients. However, no person employed by OWLFI is allowed to favor his or her own interest over that of a client or make personal investment decisions based on the investment decisions of advisory clients.

In order to address potential conflicts of interest, OWLFI retains records of employee personal securities activities.

## **Item 12 – Brokerage Practices**

### ***The Custodian and Brokers We Use***

We do not maintain custody of client assets. Instead, we require all client assets be maintained in an account at a non-affiliated “qualified custodian,” generally a broker-dealer or bank. We are not affiliated with any particular custodian but instead all custodians are independently owned and operated. The custodian will hold your assets in a brokerage account and will be able to buy and sell securities on your behalf. While we may recommend that you use a particular custodian/broker, you will ultimately decide whether to do so and will open your account with the custodian/broker by entering into an account agreement directly with one of them. We cannot actually open accounts for you, but we can assist you in opening an account at whatever custodian/broker you decide to use.

If you direct us to use a specific broker, we may not be able to achieve the most favorable execution of your transactions because for example we may not be able to aggregate orders to reduce costs. Therefore, directing us to use a specific broker may cost more money.

### ***How We Select Custodians and Brokers***

When recommending a custodian or broker for our clients, we consider many different factors including quality of service, types of services offered, overall capability, execution quality, competitiveness of transaction costs, availability of investment research, reputation of the firm, and financial resources, among other things. In determining the reasonableness of a broker's compensation, we consider the overall cost to you relative to the benefits you receive, both directly and indirectly, from the broker.

### **Your Brokerage and Custody Costs**

Our clients receive various services directly from our custodians. For our clients' accounts that they maintain, the custodian may charge separately for custody services or instead be compensated by charging commissions or other fees on trades that it executes or trades that are executed by other brokers to and from the custodial accounts. Fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a certain level of assets at the custodian. We feel this commitment benefits you because we expect the overall rates you pay will be lower than they might be otherwise.

Since custodians often charge clients a fee for each trade that we have executed by a different broker-dealer, we have the custodians execute most trades for your account in order to minimize your trading costs. We have determined that having the custodians execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means seeking the most favorable terms for a transaction based on all relevant factors, including those listed above.

### **Products and Services Available to Us from Brokers/Custodians**

The custodians provide us and our clients with access to its institutional brokerage services like trading, custody, reporting, and related services, many of which are not typically available to retail customers. The custodians also make available various support services, some of which

may help us manage or administer our clients' accounts, while others may help us manage and grow our business.

Other institutional brokerage services which benefit you directly include access to a broad range of investment products, execution of securities transactions, and asset custody. The investment products available through the custodians include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

The custodians may also make available to us other products and services that benefit us but may 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 the custodians' own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the custodians. In addition to investment research, the custodians may also make available software and other technology that provide access to client account data, facilitates trade execution for multiple client accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

The custodians may also offer other services intended to help us manage and further develop our business. These services include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from the custodians benefits us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with a particular custodian based on our interests rather than yours, which is a potential conflict of interest. We believe, however, that our recommendation of a custodian is in the best interests of our clients, and is primarily supported by the scope, quality, and price of the custodian's services and not the custodian's services that benefit only us.

### **Aggregation of Transactions**

OWLFI may, from time to time, aggregate client orders into blocks in order to facilitate more efficient account management and execution. When aggregating orders, an average price is given to all participants in the block, or other measures are taken, in order to treat all accounts fairly.

## **Item 13 – Review of Accounts**

### **Review of Accounts**

Accounts are generally reviewed on a weekly, monthly, quarterly, semi-annual basis, or annual basis depending on the type of account. Reviews may be general in nature, addressing investment objectives, risk tolerances or asset allocations, or they may be more detailed, depending on circumstances. The level of detail of the review is generally triggered by factors such as market, political, or economic conditions, or the client's individual financial situation. Clients should notify the firm of any material personal financial changes.

### **Regular Reports Provided to Clients**

In addition to the monthly statements and confirmations of transaction that clients receive from the custodian, OWLFI may provide other reports directly to the client from time to time depending on the type of engagement. Investment management clients for example may receive periodic holdings and or performance related reports.

OWLFI urges clients to carefully review custodial statements and compare them to the reports which we may provide.

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

OWLFI may compensate outside parties for client referrals. Such referral arrangement will however be structured to be consistent with regulatory requirements. OWLFI may also receive compensation or non-cash economic benefit for client referrals. Client should note that acceptance of referral fees by OWLFI creates a conflict of interest because the firm or its representatives has an incentive to recommend an outside party based on referral fees received. However, when referring clients to an outside party, the firm will not only disclose compensation received but will also strive to be cognizant of the client's best interest at all times. Moreover, engagement of an outside party is always at the client's discretion.

OWLFI does, however, receive economic benefits from our custodian in the form of the support products and services that are made available to us and to other independent investment advisors. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 above. The firm may also on limited occasions receive travel expense

reimbursements for industry meetings related to market analysis, investment strategies, and practice management. The availability to us of these economic benefits is not based on us giving particular investment advice, such as buying or recommending particular securities for our clients. Furthermore, our representatives are required to make all investment decisions and recommendations based solely on the interests of the applicable client.

### **Item 15 – Custody**

As noted in Item 12, OWLFI recommends that clients' assets be held by a qualified custodian. Although we do not hold assets, we may have limited control in some instances to trade on your behalf, to deduct our advisory fees from your account with your authorization, or to request disbursements on your behalf (although various types of written authorizations are required depending on the type of disbursements).

You will receive account statements directly from your custodian at least quarterly, which will be sent to the email or postal mailing address you provide. OWLFI urges clients to carefully review custodial statements and compare them to any account reports that we might provide.

### **Item 16 – Investment Discretion**

OWLFI will accept discretionary authority to manage securities accounts on behalf of clients.

When granted authority to manage accounts, OWLFI customarily has the authority to determine which securities and the amounts that are bought or sold. Any discretionary authority accepted by OWLFI, however, is subject to the client's risk profile and investment objectives and may be limited by any other limitations provided by the client in writing.

Neither OWLFI nor outside managers will exercise discretionary authority until they have been given authority to do so in writing. Such authority is granted in the written agreement with the client, and in the written agreement with the third party custodian.

## **Item 17 – Voting Client Securities**

OWLFI does not vote proxies on behalf of clients. However, clients may receive proxies or other solicitations directly from their custodian and can contact OWLFI with questions.

## **Item 18 – Financial Information**

Registered investment advisers are required in some cases to provide certain financial information and/or disclosures about their financial condition. For example, if the firm requires prepayment of fees for six months in advance, has custody of client funds, or has a condition that is reasonably likely to impair its ability to meet its contractual commitments to its clients, it must provide financial information and make disclosures.

OWLFI has no financial or operating conditions which trigger such additional reporting requirements.