

**Item 1. Cover Page**



**RAM Investment Partners, LLC**

dba

**Avier Wealth Advisors**

Form ADV Part 2A

March 24, 2025

This Brochure, which is given to clients and prospective clients, provides information about the qualifications and business practices of RAM Investment Partners, LLC dba Avier Wealth Advisors. 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. If you have any questions about the contents of this brochure, please contact us at the telephone number listed below.

RAM Investment Partners, LLC is an SEC Registered Investment Advisor. However, registration does not imply a certain level of skill or training.

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Additional information about RAM Investment Partners, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a CRD number. Our CRD number is 161077.

Our Brochure is available on our website, [www.avieradvisors.com](http://www.avieradvisors.com). You may also request a copy at any time by contacting our Chief Compliance Officer, JP Osseward, CFA, CFP at 425.467.1011 or via email at [jp@avieradvisors.com](mailto:jp@avieradvisors.com).

## **Item 2. Material Changes**

RAM Investment Partners, LLC updates this ADV Part 2A annually, or more frequently in the event of certain material changes. This section outlines and summarizes the specific changes made to this Brochure since our last update.

Going forward, we will ensure that you receive a summary of any material changes to our brochure within 120 days of our company's fiscal year-end. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes will include the date of our initial filing until we do an annual update of our brochure.

The following material changes have been made to this disclosure brochure since our annual update dated March 01, 2024:

We have added additional language in Item 5 regarding the Onboarding fee charged upon signing of our investment management agreement until assets are received.

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## **Item 4. Advisory Business**

In this Brochure, we use the terms Avier, us, we, and our to refer to RAM Investment Partners, LLC (dba Avier Wealth Advisors). As discussed in this item, we provide investment advisory services to individuals, families, pension and profit-sharing plans, trusts, corporations and business entities. In this Brochure, we refer to clients or prospective clients as either the client, you or your.

### **Overview, History and Ownership**

RAM Investment Partners, LLC was founded in January of 2000 by David “Dave” Welty, RAM’s controlling shareholder, and Managing Member. Our main office is located in Bellevue, Washington. As noted on the Cover page, RAM Investment Partners, LLC operates under the trade name Avier Wealth Advisors.

We have been in the process over the last few years of implementing our succession plan. Over time, these ownership percentages will change as we continue with this implementation. Current Shareholders and Ownership Percentages are listed below:

David Keith Welty: 38%

Lars Lee Phillips: 17.5%

John Preston Osseward III: 17.5%

Nicholas Leo Wright: 17.5%

Aaren N. Strand: 9.5%

### **Types of Advisory Services**

Avier offers financial planning and investment advisory services to a wide range of individuals and families, Pension and Profit-sharing Plans, Corporations, and Businesses. We strive:

- to integrate the goals and objectives of our client, using assumptions that they provide, to create a financial plan. This process includes the completion of a risk tolerance/suitability survey and investment election form, as well as a cash needs analysis, which assists us with the selection of an appropriate allocation.
- to give recommendations which focus on attempting to accomplish our client’s goals based on the information you provide.

We are committed to protecting the confidence and trust that our clients have placed in us and upholding our fiduciary responsibility of always placing your best interest before that of our firm and our employees.

## **DESCRIPTION OF ADVISORY SERVICES**

When providing investment advice, we generally recommend the purchase of various mutual funds and exchange-traded funds/notes (“ETFs” and “ETNs”). In some cases, we may also manage individual stocks or bonds for our clients depending on the particular needs and circumstances of the client.

All of our advice is tailored to your individual needs and goals. Through our financial planning process, we develop a customized plan and investment strategy. We are willing to accept direction from clients regarding specific investments and will hold specific securities in a client’s account as requested. We are also willing to report on investments held away from us, as requested. Different fees may apply in these various instances; please refer to Item 5 for additional details.

Once you have established a relationship with us, management of your account(s) is done through an interactive process. Depending upon your needs, you are encouraged to meet with your Financial Advisor on a regular basis, whether that is quarterly, semi-annually or annually. If there are any significant changes in your financial situation, needs or investment objectives, please contact us promptly.

We provide discretionary advisory services for your assets that are specifically subject to our Investment Management Agreement (the “Agreement”). You may place investment restrictions and guidelines on your account(s), with Schedule A of our Agreement being used for this particular purpose. All of our portfolios are invested primarily in open-ended mutual funds and ETFs/ETNs. On occasion, a closed-end mutual fund, ETN, or other appropriate investment may be purchased. You may also transfer legacy holdings into your account. You, along with your Financial Advisor, will decide how those assets will be integrated in the structure of the portfolio that we will manage for you.

Based on our analysis and determination of the appropriate investment strategy or strategies, we may also engage on your behalf, unaffiliated third-party managers (“sub-advisers”) to manage a portion or all of your assets. Before we select a sub-adviser to act as an advisor for our client accounts, we confirm the manager is registered as an investment advisor in their home state jurisdiction or with the

## Securities and Exchange Commission.

For held-away assets, we offer the ability to incorporate those holdings in your asset allocation strategy. Held-away assets are defined as those assets held at custodians with whom Avier does not have a contractual or custodial relationship, including any employer's retirement plans. We do not have discretionary authority on these held-away assets, so it is your responsibility to implement any of our recommendations in these accounts. Failure to implement these recommendations could have a significant negative impact on your total portfolio. Transactional and historical data on these assets can be downloaded through a secure connection with a third-party provider and can be integrated into our current portfolio management software. See Item 5 for an explanation of the additional management fees charged for this service.

For a very small number of qualified clients, we may advise on the sub-accounts in a variable life annuity product or in a variable universal life insurance policy offered by unaffiliated national life insurance companies via a limited power of attorney assigned to the client's variable annuity or variable universal life insurance policy. Other than the standard management fees related to the value of these assets, as indicated in Item 5, we do not charge or receive any other compensation for advising on these sub-account assets.

While all of these processes may assist you in making decisions as to investment strategy, amount to invest, or investment pattern, it is not a substitute for expert assistance in the tax or legal fields.

## **DESCRIPTION OF FINANCIAL PLANNING SERVICES**

Clients who desire financial planning services are provided a plan that includes a personal balance sheet and certain projections. All reports, financial statement projections and analyses are intended exclusively for our clients' use in developing and implementing the financial plan. In view of this limited purpose, they should not be considered complete financial statements. Accordingly, you should understand that such documents cannot be used to obtain credit or for any purpose other than developing your personal financial plan. In addition, any financial planning is based solely on the accuracy and completeness of the information you provide and any projections or other information generated during the financial planning process are

hypothetical in nature, do not reflect actual investment results and do not guarantee any future results. Projected and actual results will likely be different because events and circumstances frequently do not occur as expected; such differences may be material. During the financial planning process, you will receive additional disclosures about projected returns and the underlying assumptions. Typically, there are not any separate fees charged for financial planning services but are included in the investment management fees paid as stated in Item 5.

### **Analysis and Assumptions**

Our analysis will be highly dependent on certain economic assumptions that are made about the future. Therefore, another important step in our process is educating you regarding historical data and key assumptions such as inflation and investment rates of return, as well as an understanding of how significantly these assumptions affect the results of our analysis. We cannot guarantee the reasonableness or accuracy of such assumptions.

**Assets under Management:** As of December 31, 2024, we were actively managing approximately \$766.1 million of client assets on a discretionary basis and \$198.2 million on a non-discretionary basis.

## **Item 5. Fees and Compensation**

Our standard fee schedule for new clients is as follows:

Account Value	Quarterly Fee	Annual Fee*
From \$ 0 to \$ 1,000,000	.2500%	1.00%
From \$ 1,000,001 to \$ 3,000,000	.225%	0.80%
From \$ 3,000,001 to \$ 5,000,000	.175%	0.60%
From \$ 5,000,001 to \$10,000,000	.125%	0.50%
From \$ 10,000,001 to \$25,000,000	.1000%	0.40%
From \$25,000,001 and up	.0750%	0.30%

\*Annual minimum fee is \$10,000, billed quarterly, unless otherwise agreed to.

Existing clients are billed under the management fee terms set forth in the latest management agreement they have signed. See the section below for management fees on held-away assets.

Management fees may also be billed on the value of sub-advised assets held in the True VA variable annuity product offered by Symetra Life Insurance Company, and the value of variable life policies at TIAA, which is currently billed at the standard billing rate, charged quarterly.

- Advisory fees are billed quarterly in advance, on the first day of the quarter, and are based on the value of the account at the end of the previous quarter.
- The fees are charged on a tiered basis, once the minimum fee has been met.
- Occasionally, various related client accounts will be grouped together to qualify for reduced advisory fees. This format is called “family billing.”
- It is the responsibility of our clients to verify the accuracy of the fee calculation.

### **Adjusted Fee Schedules**

Some advisory accounts may be managed at a reduced charge or at no charge. Advisory fees may also be negotiated based upon the size of the account and the nature of the services provided.

### **For New Accounts**

- Upon execution of our Investment Management Agreement, but prior to receiving assets, we charge an initial onboarding fee of \$27.50 per day until assets are received into the account. Once received, management fees are charged as reflected below:
  - When a new account is opened, management fees will be pro-rated based on the value of the new assets transferred into the account for the first partial quarter. The initial calculation period will start with the date that the investment process is initiated (upon receipt of account assets) and will end on the last trading day of that same quarter.
  - Should opening assets be received at different times, the pro-rated calculation noted above will apply to each set of opening assets received.
  - The management fee calculation for subsequent quarters will follow the method described above, based on the account value on the late business day of the quarter.

### **Significant Contributions and withdrawals**

- Accounts held in custody at Schwab and Fidelity and are billed on a quarterly



basis in advance. Pro-rated management fees will be assessed on additional significant contributions received or credited on significant withdrawals taken during the previous quarter for existing accounts.

- We define “significant” as \$50,000.
- The pro-rated management fees or credit will be posted on the next quarter’s billing statement.

### **Fees charged on assets managed by a non-affiliated sub-adviser**

We generally negotiate management fees on your behalf directly with the sub-adviser. Such fees will be reflected separately from Avier fees on your account statements. The total fee you pay could be more than the fee charged by the sub-adviser directly. However, in many instances you may not have direct access to these sub-advisors as such access may only be available through arrangements we have negotiated directly with the sub-advisor.

Avier fees are exclusive of custodial brokerage commissions, transactions fees, and other related costs and expenses (if any) which you will incur. These expenses include custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, or other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund’s prospectus. Such charges, fees and commissions are exclusive of and in addition to Avier’s fee. We do not receive any portion of these commissions, fees, or costs.

### **Held-Away Accounts**

- The annual management fee for this service is the same as the standard billing rate as described in the fee table above. It is charged quarterly in advance.
- The management fee will be calculated on the market value of the held-away accounts on the last trading day of each fiscal or calendar quarter. Fiscal quarters are defined as those quarters which end on months other than March, June, September, or December. This fee may be calculated in combination with management fees on other accounts that Avier manages under a limited power of attorney (“family billing”).
- The details of this service are contained in our Agreement. Clients initial the method of payment and then sign this particular section, acknowledging your full understanding of the service.

### **Advisory Fees upon Termination**

In cases when the Investment Management Agreement does not span the full billing period, as in the case of termination, the management fees are prorated to the date on which the account shows a zero balance. You can terminate the Agreement by notifying us in writing at our principal place of business or via electronic correspondence. If you terminate the relationship within the first five (5) days of the relationship, all management fees charged for the quarter will be refunded. If you terminate the relationship after five (5) days but before the quarter is complete, a prorated refund will be issued for any unearned fees. The proration is based upon the ratio of the number of days that the assets were under management (until the terminated account has a zero balance) to the number of days in the quarter. If applicable, a statement reflecting the calculation of the pro-rated management fees is included. These fees are either reimbursed directly into your account or by a company check made payable to the account holder.

### **Discretionary Authority**

We establish a discretionary relationship through the Investment Management Agreement and the account paperwork submitted to the custodian of your assets. A discretionary relationship helps to facilitate the investment process. The Agreement grants trading privileges and allows us to place trades without specific consent from you. For example, it allows us to rebalance your portfolio(s) when necessary. Unless notified of any specific restrictions, we are not limited to which security or mutual fund may be purchased or sold on your behalf or the amount of any security or mutual fund purchased, sold or held in your account so long as the trade(s) conform to your current risk/suitability profile. In exercising discretion, we must act at all times in the best interest of our clients.

Neither Avier nor our Financial Advisors have the authority to withdraw funds or to take custody of funds or securities except for quarterly management fees as authorized in your Agreement with us. You are encouraged to review your monthly/quarterly statements received directly from the custodian for all activity in your account(s) during the period and to compare reports you receive from us.

All fees paid to Avier for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds, ETF/ETNs, and other similar pooled investment vehicles. These fees and expenses are described in each fund's prospectus. These funds will generally include a management fee, other fund

expenses, and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge. However, as an institutional investor, we almost exclusively employ no-load share classes for all of our mutual fund recommendations. You could invest in a mutual fund or ETF/ETN, without our services. In that case, you would not receive the services provided by Avier, through our screening and selection process, which is designed, among other things, to assist you in determining which mutual fund(s) or ETFs/ETNs are most appropriate to your financial condition and objectives. Accordingly, you should review both the fees charged by the funds and our fees to fully understand the total amount of fees you will pay in relation to the services we offer. See Item 12 for additional information.

### **Important Information for Retirement Investors**

As an investment advisor, Avier is a fiduciary for all of our clients. We explicitly acknowledge that we are a “fiduciary” under ERISA or the Internal Revenue Code, or both, with respect to our investment advisory recommendations and discretionary asset management provided to Retirement Investors as part of our management agreement. Per the Department of Labor’s Fiduciary Rule, a “Retirement Investor” is defined as:

- 1) a participant or beneficiary of a retirement plan with authority to direct the investment of assets in his or her retirement plan account or take a distribution,
- 2) the beneficial owner of an IRA, or
- 3) a “retail” fiduciary, defined as a retirement plan or IRA fiduciary that is not an “independent fiduciary with financial expertise.”

In recommending that any client roll over or transfer retirement plan assets to our management, we have a conflict of interest. Before making any such recommendation, we will review your existing investment options, fees, expenses, and services provided, as well as your overall investment objectives. We will only make the recommendation once we’ve determined that doing so is in your best interest.

As such, we are subject to specific duties and obligations under ERISA and the Internal Revenue Code that includes, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, we may only charge fees for investment advice about products for which we and/or our Financial Advisors do not receive any commissions or 12b-1 fees.

Comparable services may be available elsewhere for less.

## **Item 6. Performance-based Fees and Side-by-side Management**

Per our policy, we do not charge performance-based fees.

## **Item 7. Types of clients**

We provide investment and financial planning services to individuals and families, pension and profit-sharing plans, trusts, corporations and other business entities.

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

In constructing our clients' portfolios, our focus is upon asset allocation across a broad spectrum of asset classes in order to produce risk-adjusted portfolios we believe to be appropriate to each of our clients' risk tolerance. We use various research strategies in our due diligence process, including but not limited to Morningstar research and multiple analyses of the returns, risks, and fundamentals in the current and prospective funds.

We do this using primarily mutual funds and ETFs/ETNs. When available, we favor using low-cost institutional-class mutual funds or ETFs along with funds that have no-loads. Portfolios are monitored proactively, and trading occurs as necessary when a funds asset class exposure falls outside our target parameters and when replacing or substituting a position in the portfolio.

We focus our fund investments using managers whose equity strategies are grounded in over 40 years of academic research originating primarily from the University of Chicago, but also the Wharton School of Business, Dartmouth, Yale, MIT and Harvard. This research indicates, among other things, that company size and valuation are important factors in determining investment performance. We seek to efficiently capture available equity returns by structuring globally diversified portfolios using mutual funds or ETFs whose manager's strategy is based upon this research.

Fixed income and alternative ("diversifiers") asset-classes within our portfolios are geared towards reducing overall volatility in addition to providing income. Here, our focus is on finding mutual funds or ETFs whose asset classes historically have acted as a counter balance to the equity markets with the goal of reducing overall portfolio risk. Evaluations of relative value and levels of potential interest-rate risk are important

analytical elements we use in determining which funds are included in this portion of our portfolios.

### **Sub-Advisers**

Before any initial investment, our typical process is to request in-depth information from the sub-adviser; evaluate the data provided by the sub-adviser and other resources including manager databases and industry contacts; compare and contrast the sub-adviser to competitors; meet in-person or over the phone with the portfolio managers, compliance officer(s) and other key personnel; and conduct an onsite visit if needed. Following selection of a sub-adviser we usually engage in contract and fee negotiations, and we perform follow-up evaluations at least annually. Sub-advisers will be replaced for a variety of reasons, including breach of duty, deviation in strategy, persistent underperformance, change in leadership or structure that we believe may impact future results, or a better opportunity elsewhere.

Below is a summary of the due diligence we perform on third party sub-advisers:

- Overview of the Firm
- Management Team
- Philosophy and Investment Strategy
- Portfolio Review and Performance Evaluation
- Risk Assessment
- Administration/Operational/Legal Evaluation

These reviews are conducted by the Investment Committee.

### **Risks**

Any investment activity, including investing in securities directly or through mutual funds, ETFs and other publicly traded pooled vehicles, involves risk of loss that clients should be prepared to bear. All investments carry the risk of loss, including complete loss, and there is no guarantee that any investment strategy will meet its objective. Any past success of a particular investment strategy or methodology does not imply or guarantee future success. We ask that you work with us to help understand your tolerance for risk. Depending on the investment strategy and the type of financial instruments used at any given time to implement that strategy, clients may face the following material investment risks.

Asset Class & Fund Manager Risk – The asset classes included in your portfolio may underperform in comparison to the market in general. Managers may underperform within their respective asset classes.

Equity Securities & Market Risk – Investment in equity securities may be more volatile than other types of investments. Although we hold many thousands of equity securities through mutual funds or ETFs, a number of them (especially smaller companies) may become worthless within any given year. Your account could lose money over short periods due to short-term market movements and over longer periods during market downturns.

Exchange Traded Notes (ETNs) – An ETN is a bond issued by a financial institution. That company promises to pay ETN holders the return on some index over a certain period of time and return the principal of the investment at maturity. However, if something happens to that company (such as bankruptcy) and it's unable to make good on its promise to pay, ETN holders could be left with a worthless investment or an investment that is worth much less (just like anyone who had lent the company money). Specifically:

- **Credit risk:** ETNs rely on the creditworthiness of their issuers, just like unsecured bonds. If the issuer defaults, an ETN's investors may receive only pennies on the dollar or nothing at all, and investors should remember that credit risk can change quickly.
- **Liquidity risk:** The trading activity of ETNs varies widely. For ETNs with very low trading activity, bid-ask spreads can be exceptionally wide.
- **Issuance risk (aka volatile premiums):** The supply of ETNs are controlled entirely by their issuers. If the issuer decided to stop issuing new shares of the ETN, it's possible the demand for the ETN could exceed the supply available and the note's price could increase by much more than its indicated value. If they were to again re-issue new shares, the ETN's price could dive dramatically.
- **Closure risk:** There are multiple ways for an issuer to effectively close an ETN. An issuer may call the note (also known as "accelerated redemption") by returning the value of the note less fees. However, not all ETNs have terms which allow for accelerated redemption. The alternative is for issuers to delist the note from national exchanges and suspend new issuance. When this happens, ETN investors are left with two choices. They can either hold the note until it matures, which could be years away, or trade the ETN in the over-the-counter (OTC) market where spreads can be even wider than on

national exchanges.

Market Trading & Liquidity Risk – Your investment account faces numerous market trading risks, including the potential lack of an active market for investments held in your account. This includes both the mutual funds and securities held by the mutual funds. Additionally, to meet liquidity needs, mutual funds may be forced to sell securities at depressed prices in order to create liquidity for redemption requests.

Management Risk – The performance of your account is subject to the risk that our investment strategy may not produce the intended results. Passive Investment Risk – Avier may use passively managed mutual funds which do not attempt to take defensive positions in declining markets.

Leverage and Derivatives Risk – Within the mutual funds, managers may enter into certain transactions that give rise to a form of leveraging, including borrowing. They may also use derivatives which can create leverage. The use of leverage may cause a portfolio to liquidate portfolio positions when it may not be advantageous to do so. Leveraging may make a portfolio more volatile than if the portfolio had not been leveraged. This is because leverage tends to increase a portfolio's exposure to market risk, interest-rate risk, or other risks by increasing assets available for investment. Derivatives such as futures, options, and swap agreements can also lead to losses, particularly when derivatives are used to enhance return rather than offset risk.

Regulatory Risk – The legal, tax, and regulatory environment worldwide in the financial industry is evolving, and changes in regulations affecting the financial industry, including Avier and the issues of financial instruments held in client accounts, may have a material adverse effect on our ability to pursue the investment strategies described above or the value of the instruments held in client accounts. There has been an increase in scrutiny of the financial industry by governmental agencies and self-regulatory organizations. Various national governments have expressed concern regarding the disruptive effects of speculative trading and the need to regulate the financial markets in general. New laws and regulations or actions taken by regulators that restrict our ability to pursue our investment strategies or conduct business with broker-dealers and other advisors or counterparties with whom we work could adversely affect client accounts.

**Concentrated Stock Risk** – Investors may hold a large amount of their overall wealth in one security. This creates additional volatility as single stocks generally have more volatility than a basket of stocks. Investors may hold concentrated stock positions for a number of reasons such as regulatory restrictions or tax implications. Regardless of the reason, concentrating wealth into one position creates additional volatility both positively and negatively.

**Legacy Holdings Risk** – Securities that are brought to Avier which are not subsequently sold and fully diversified carry the potential for greater concentration and specific issuer risk in the portfolio that may result in more volatile results and a higher risk of loss than a fully diversified portfolio.

**Extraordinary Events** – Global terrorist activity and armed conflicts may negatively affect general economic conditions, including sales, profits and productions, and may materially affect prices and/or impair our trading facilities and infrastructure or the trading facilities and infrastructure of our custodians, counterparties or the exchanges or markets on which we (they) trade.

**Cybersecurity Risk** – Recent events have illustrated the cybersecurity risks that companies in various industries have faced, along with damages that may ensue. Being in the financial services industry, we acknowledge that cybersecurity risks exist for our firm. We are certainly mindful of them, focusing our efforts on maintaining and improving our policies and procedures in this area, striving to mitigate our risks. We review, no less than annually, our service providers' policies and procedures related to their specific cyber risks, and their policies related to mitigation of such risks. Even with all best efforts of prevention and mitigation, a cyberattack or other unauthorized access could be directed at Avier or one of our service providers, and thus there is a potential risk of loss of personal information and data.

## **Item 9. Disciplinary Information**

Avier does not have any disciplinary events to disclose.

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

We may receive client referrals from Schwab through our participation in Schwab Advisor Network®. Schwab has established this Network as a means of referring its brokerage



customers and other investors seeking fee-based personal investment service or financial planning service to independent investment advisors. Please see Item 14 – Brokerage Practices for further information about the Schwab Advisor Network® as well as referrals we receive from other non-affiliates.

During the year, we sponsor various client educational events and seminars, where investment strategies, market conditions and other topics are discussed. Periodically, we may co-sponsor these events with some of the mutual fund companies with which we have a business relationship. This could create a potential conflict of interest. When choosing mutual funds/companies to use in our clients' portfolios, our primary consideration is the suitability of the fund for our clients, as well as the results of our due diligence on the company and the various funds we are considering.

## **Item 11. Code of Ethics, Interest in Client Transactions and Personal Trading**

### **Code of Ethics and Personal Trading**

Avier places the highest priority on maintaining our reputation for integrity and professionalism. That reputation is a vital business asset. The confidence and trust placed in Avier and our employees by our clients is something that we value and endeavor to protect. Thus, we have adopted a Code of Ethics “the “Code”), which sets forth our expectations of appropriate ethical conduct by our employees and related or associated persons.

The Code provides guidance and specific standards of conduct or situations where violations, inadvertent or otherwise, could occur in the conduct of business. Employees must avoid situations where their personal interests conflict with the interests of Avier or our clients. The Code describes appropriate conduct surrounding gifts, outside employment, fiduciary appointments, political activities and personal investments and trading activities. In addition, the Code prohibits dishonest and fraudulent acts and reaffirms our commitment to client confidentiality.

Every employee and associated person is required annually to sign a statement acknowledging that he or she agrees to abide by the standards set forth in the Code.

Employees and associated persons of Avier may, from time to time, purchase or sell shares of the same securities, which are held in our clients' accounts. Given that the majority of our portfolios are invested in open-ended mutual funds and ETFs, we do

not believe there is a material risk that such personal trades, which may be placed at or near the time of client trades, would in any way be detrimental to our clients. We have a pre-clearance requirement and procedure for buys and sells of stocks in which a client holds a concentrated position and is also employed by that company. This policy also includes employees who have an immediate household member who holds a high-level position at a publicly traded company. Our Managing Director together with the Investment Committee will determine if that company should be put on the pre-clearance list.

A complete copy of the Code of Ethics may be requested by contacting our Compliance Officer at 425.467.1011.

**Participation or Interest in Client Transactions:**

It is our policy to permit the firm and our employees to buy, sell, and hold the same mutual funds and ETFs that we also recommend to clients. It is acknowledged and understood that we perform investment services for various clients with varying investment goals and risk profiles. As such, our investment advice may differ between clients and investments made by our employees. Should any buys or sells of any mutual funds occur in the accounts of any of our clients or employees on the same day, all accounts receive the end of day pricing for the mutual fund shares.

We have no obligation to recommend for purchase or sale a mutual fund or security that our principals, affiliates, or employees may purchase, sell, or hold. When a decision is made to liquidate a security from all applicable accounts, priority will always be given to the client's order before those of an employee or associated person to the advisor. In some cases, for placing non-mutual fund trades, the trades of clients and advisory personnel will be combined in a single block trade. For mutual fund trades, all trades will receive the end-of-day pricing for the shares. For securities trades, all trades will receive the average price for the shares.

We have procedures to deal with insider trading, employee-related accounts, "front running," and other issues that may present a potential conflict when such a purchase, sales or recommendation are made. In general, these policies and procedures, including the review of employee security transactions and holdings, are intended to eliminate, to the extent possible, the adverse effect of potential conflicts of interest on clients.

## Item 12. Brokerage Practices

As discussed below, we currently recommend the services of Charles Schwab & Co., Inc. ("Schwab") or Fidelity Institutional<sup>SM</sup> a division of Fidelity Investments ("Fidelity").

We have entered into a custodial contract with Fidelity, and Schwab both of which are qualified, unaffiliated custodians and full-service brokerage firms with offices throughout the United States. Fidelity and Schwab are SEC-registered broker-dealers and FINRA/SIPC members.

Clients will sign a separate contract with Fidelity, or Schwab. Both custodians provide custody and brokerage services, monthly/quarterly reporting to clients and daily electronic reporting to us. Each client maintains one or more separate accounts with Fidelity, or Schwab for this purpose, and pay Fidelity, or Schwab directly for custody and brokerage services. The amount of Fidelity's or Schwab's fee is included in the contract clients sign with the specific custodian. Custodial recommendations will generally be made based on the particular type of account(s) under management as well as other services provided by the particular custodian. We believe the selection of these two custodians is in the best interest of our clients due to the scope, quality, and price of custodial services.

Avier does not have any traditional soft-dollar arrangements. However, as discussed below, and in other areas of this document, Avier does typically receive benefits from relationships with recommended custodians, their affiliates and mutual fund or ETF companies we place in client portfolios.

We participate in the Fidelity and Schwab Institutional programs, which provide us with access to their institutional trading and operations services. There is not a minimum level of assets of clients' accounts required to access these types of services. Our participation in the institutional programs does not depend on the amount of brokerage transactions directed to Fidelity or Schwab. By participating in these Institutional programs, we receive economic benefits that are not typically available to retail investors of these custodians. There is no direct link between our participation in these programs and the investment advice we give to our clients.

These services and benefits from Fidelity or Schwab may include:

- research
- brokerage
- custody
- access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment.

Fidelity and Schwab also make available other products and services that benefit us but may not benefit our clients' accounts. These may include software and other technology that:

- provides access to client account data;
- facilitates trade execution, including access to an electronic communications network for client order entry and account information;
- provides research, pricing information, and other market data;
- facilitates payment of Avier's management fees from our clients' accounts (only as authorized by our clients); and
- assists with back office support, recordkeeping and client reporting, including duplicate client statements and confirmations.

Many of these services generally may be used to service all or a substantial number of our accounts, including accounts not held in custody at Fidelity or Schwab.

Fidelity or Schwab may also provide us with other services intended to help us manage our business enterprise. These services may include publications on:

- regulatory compliance on general market conditions;
- information technology;
- practice management;
- financial planning; and
- marketing.

Through our relationship with these custodians, we may also receive discounted fees from third-party providers for their products.

For clients who have a True VA variable annuity, those assets are held in custody at Symetra Life Insurance Company. For clients who have a variable life product, those assets are held in custody at TIAA.

### **Best Execution**

As indicated above, we typically require that clients open brokerage/custodial accounts at custodians not affiliated with us –Fidelity or Schwab. We are not compensated directly for recommending custodians to clients, though we may receive indirect economic benefits from those custodians as outlined above. The criteria for suggesting a custodian include reasonableness of commissions and other costs of trading, ability to facilitate trades, access to client records, computer trading support and other operational considerations. These factors will be reviewed from time to time to ensure that the best interests of the clients are upheld.

In seeking “best execution” for clients, the key factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into account the full range of services, including execution capability, technological processes used for submitted trades and other valuation services.

While we acknowledge our duty to seek best execution of trades in client accounts, all trades for accounts held in custody at Fidelity or Schwab will be executed at the specific custodian holding your assets. Since all trades for accounts held in custody at Fidelity or Schwab must be executed through the same broker/dealer, directed brokerage is not available to clients.

From time to time, clients may transfer in securities as part of their ongoing management. When these securities are sold, procedures are in place to confirm that the executed sales price received is within the parameters of best execution as set by us, as the trading department regularly monitors the amount of time it takes to execute a trade, along with the price of the trade.

On a monthly basis, mutual fund and securities valuations provided by our custodians are verified via outside independent third-party sources that are publicly available, such as Yahoo Finance, MSN Money or Big Charts. The pricing on all mutual funds that are held in each of our set portfolios at the end of the month are checked, plus three random equity positions. Should there be any pricing variances from those provided through the downloads from Fidelity or Schwab to the end of the month pricing obtained from the outside sources, any discrepancies will be resolved immediately with the Pricing Department at Fidelity or Schwab and corrections (if any) will be reflected in our portfolio management system.

We have the ability to block trade securities in our clients’ portfolios. If we opt to

block trade security positions, then all participants receive the average price received on that day.

As part of our fiduciary duty to our clients, we endeavor at all times to put the interest of our clients first. We want our clients to be aware that the receipt of the above benefits and services from Fidelity and Schwab may create a potential conflict of interest, as this could indirectly influence our choice of broker-dealer for custody and brokerage services. Avier reviews its choice of custodians on an annual basis to reaffirm the health of each entity, the quality of executions and the additional services provided by Fidelity and Schwab. We believe our selection of Fidelity and Schwab as custodians and brokers is in the best interest of our clients because of the scope, quality, and price of the services provided.

We do not permit agency cross transactions or principal transactions. We have policies and procedures in place regarding these restrictions, as well as all of our staff's awareness of the restrictions.

### **Commissions and Fees**

Fidelity and Schwab retain any commission or (12b-1) fees paid from broker/dealers who executed the trades or any fees from the mutual funds. We do not receive any investment management compensation other than client-paid management fees.

## **Item 13. Review of Accounts**

### **Account Reviews:**

Accounts reviews occur daily and include but are not limited to:

- Comparison of each portfolio to each client's agreed upon target allocation, which is based on each client's current risk/suitability profile form on file.
- If a portfolio is "out of tolerance" to the established parameters, the appropriate Financial Advisor is notified and then makes a determination as to rebalancing the portfolio to cure the out of tolerance issues. The Financial Advisor may also talk to the client and together, they may decide for a variety of reasons to leave the account out of tolerance.
- Our Compliance Department also monitors our clients' portfolios for consistency with client objectives/risk tolerance and restrictions.

### **Client Reviews:**

We meet with clients regularly to review their asset allocations, risk tolerance, objectives and strategies, either in person, online, or over the phone. These may be conducted annually or more often, based on requests from our clients. For these meetings, we prepare various written analysis reports for each account, which are then reviewed in detail during the meeting(s). In addition, clients receive reports from Fidelity or Schwab (and other custodians in the case of Held-away Assets, True VA, TIAA Variable Insurance Products, or REITs), which include the securities positions held in the account and any transactions during the period.

Clients may also receive from their custodian additional reports, trade confirmations and tax information such as 1099s and 5498s. It is often possible to receive these reports electronically.

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

### **Schwab Advisor Network®**

Avier receives client referrals from Charles Schwab & Co., ("Schwab") through Avier's participation Schwab Advisor Network® ("The Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with Avier. Schwab does not supervise Avier and has no responsibility for our management of clients' portfolios or Avier's other advice or services. We pay Schwab fees to receive client referrals through the Service. Our participation in the Service raises potential conflicts of interest described below.

We pay Schwab a participation fee on all referred clients' accounts that are maintained in custody at Schwab and a separate one-time transfer fee on all accounts that are transferred to another custodian. The transfer fee creates a conflict of interest that encourages us to recommend that client accounts be held in custody at Schwab. The participation fee we pay is a percentage of the value of the assets in the client's account. We pay the participation fee for so long as the referred client's account remains in custody at Schwab. The participation fee and any transfer fee is paid by Avier and not by the client. We have agreed not to charge clients referred through the Service fees or costs greater than the fees or costs we charge clients with similar portfolios who were not referred through the Service.

The participation and transfer fees are based on assets in accounts of Avier's clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, we will have incentive to recommend that client accounts and household members of clients referred through the Service maintain custody of their accounts at Schwab.

### **Zoe Advisor Network (ZAN) Referrals**

We also receive client referrals from Zoe Financial, Inc, through our participation in Zoe Advisor Network (ZAN). Zoe Financial, Inc. is independent of and unaffiliated with Avier. Zoe Financial established the Zoe Advisor Network as a means of referring individuals and other investors seeking fee-only personal investment management services or financial planning services to independent investment advisors. Zoe Financial does not supervise Avier's advisory activities and has no responsibility for how we manage referred client portfolios or our other advice or services. We pay Zoe Financial an on-going fee for each successful client referral. This fee is a percentage of the advisory fee that Avier receives from the referred client. We do not charge clients referred through Zoe Advisor Network any fees or costs higher than our standard fee schedule as noted in Item 5 of this Brochure. All clients referred to us from Zoe Financial Inc. will receive the Zoe Financial Disclosure and Acknowledgement Form.

We have additional written agreements with other unaffiliated investment advisors that provide compensation for successful referrals of new clients. Our agreements with these entities provide that the introducing firm will receive a portion of the advisory fees that would otherwise be charged and retained by Avier. These agreements require the other firm to make full disclosure of the arrangement to prospective clients in advance of the referral and to obtain client acknowledgment of the arrangement. Further, these arrangements do not result in clients paying fees higher than they would otherwise pay for similar services.

### **Other Referral Fees:**

We have an agreement with an unaffiliated lead generating firm that matches Avier with potential clients based on specific criteria. The one-time payment for each referral is based on the potential clients self-reported intended account size.



## **Item 15. Custody**

Avier does not take custody of client assets. However, we are deemed to have custody because we have the ability to debit the quarterly management fees directly from clients' accounts, which is authorized by your Investment Management Agreement.

To comply with the requirements of the SEC's custody Rule, our clients receive monthly statements from their custodian, either in paper format or electronic format. For clients holding a True VA variable annuity, they will receive quarterly statements from Symetra Life Insurance Company as well as confirmations whenever trades are placed in their sub-accounts. For clients holding a TIAA Variable Life product, they will receive quarterly statements from TIAA.

These statements are the official records of our clients' accounts. We encourage our clients to compare and verify the information on any statements that we produce with

the information on the statements from the specific custodian. Our clients also have electronic access to their accounts through custodial login options.

We execute trades for our clients' accounts via a limited power of attorney, which grants trading privileges to us. This gives us discretionary authority to trade our clients' accounts without prior notification of the trades to our clients. Our clients may request to receive trade confirmations and prospectuses from the custodian. This election may be made at any time by our clients and may be changed at any time by our clients.

These same assets will also be subject to additional fees and expenses as set forth in the prospectuses of the funds in which our clients' accounts are invested, and fees and expenses charged by the custodian, all of which are ultimately borne by our clients.

## **Item 16. Investment Discretion**

Details regarding the investment discretion that we exercise with respect to our client accounts are included in Item 4 – Advisory Business. Avier usually receives discretionary authority from our clients at the outset of an advisory relationship, as confirmed with the signed Investment Management Agreement and the custodial paperwork to establish the advisory account(s). Discretion means that, without having to obtain prior approval, we may execute investment transactions in a portfolio in

order to implement the strategy we have developed with a client. Investment transactions include executing specific purchase, sale or other securities transactions, and establishing specific investment accounts. Investment discretion does not include the ability to obtain possession of the securities in a portfolio other than to process transactions for those securities, including the movement of securities or cash from one portfolio account to another registered in the client's name.

In all such cases, such investment discretion is to be exercised in a manner consistent with the stated investment objectives for a portfolio. When selecting securities and determining amounts for investment, we are guided by the established risk tolerance, 10-year cash analysis needs, other restrictions and requirements clients have provided to us. At all times, clients retain the authority to provide us with direction regarding investments, including limitations as to the types of securities and the timing of transactions.

Additionally, you grant us authority to hire and fire selected investment manager(s) in sub-advised portfolios as described in Items 4, 5, and 8. You give us this authority when you sign our investment advisory agreement and may limit this authority by giving us written instructions. You may change/amend these limitations by once again providing us with written instructions.

#### **Item 17. Voting Client Securities**

Avier does not vote proxies for our clients. This is stated in our management agreement, which our clients sign at the outset of their advisory relationship with us.

The custodians or their appointed transfer agents send all proxies directly to our clients. You are encouraged to call one of our Financial Advisors at the phone numbers listed in Item 1, with any questions related to proxies or proxy voting.

#### **Item 18. Financial Information**

We do not require or solicit prepayment of fees six months or more in advance. We are not aware of any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients. We have never been the subject of any bankruptcy petition.

## Item 19. Privacy Policy

We are committed to building relationships with our current and prospective clients based on trust and confidence. An important part of that relationship includes maintaining the confidentiality of our clients' non-public personal information. Below is our policy regarding the collection and protection of your personal information.

### Information We Collect and Maintain

Avier, as part of our relationship as your investment advisor, will collect information about you for business purposes, such as evaluating your financial needs, processing your requests and transactions and providing you with quality service. The personal information we collect includes:

- Information you provide to us on applications, questionnaires and other forms (such as your name, address, social security number, occupation, assets and income);
- Brokerage statements, mutual fund statements or other information you authorize us to receive; or
- Information that we generate to service your account (such as trade tickets and account statements).

### Disclosure of Information

We will not disclose any non-public personal information to any non-affiliated third parties, except in the following circumstances:

- As necessary to provide the service that you have requested or authorized, or to maintain and service your account;
- As required by regulatory authorities or law enforcement officials who have jurisdiction over us, or
- To the extent reasonably necessary to prevent fraud and unauthorized transactions.

### Protecting the Confidentiality and Security of Your Personal Information

We restrict access to non-public personal information about you to only those employees and service providers who need to know that information to provide

products or services to you. Firm employees are subject to a strict employment policy as well as our Code of Ethics regarding confidentiality.

All other persons are restricted from accessing that information. We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your non-public personal information.

We respect and value that you have entrusted us with your private financial information. Avier is committed to preserving that trust by protecting and respecting the privacy of all our clients to the best of our ability. We will not disclose your non-public personal information unless it is required by law, with your direct consent, or as necessary to provide you with our services. We have not and will not sell your personal information to anyone, even if our formal client relationship ends.

## **Item 20. Business Continuity Plan**

Avier is very aware of the issues that any type of interruption/disaster may create for our clients, our staff and our company. We have adopted a business continuity plan that is designed to address:

- safeguarding the health and lives of our personnel in the event of a disaster;
- minimizing the impact of any significant business disruption on our clients' ability to conduct business with us, including accessing their records and assets; and
- restoring the firm's ability to operate normally in the shortest practical time.

We have a Business Continuity Plan and procedures in place regarding various scenarios of business disruptions that involve notifying our employees and our clients of the situation at hand. We will use multiple forms of communication, including email, notices on our website, web conferences, telephone, and recorded messages on a second voicemail (if our telephone system is not available). We have two different secure computer back-up systems, where our data (including important client documents and corporate books and records) is stored locally as well as outside of our geographic location. For additional information, please contact our Compliance Department at 425.467.1011 .

**Item 1 – Cover Page**

David K. Welty, CFP® - Founder and Managing Director  
RAM Investment Partners, LLC dba  
Avier Wealth Advisors

10655 NE 4<sup>th</sup> Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about David Keith Welty that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425-467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about David Welty is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**David K. Welty**

Year of Birth: 1960

**Education:**

Mesa State College; BS Geology

**Business Experience:**

- 2012 to Present: RAM Investment Partners, LLC - Co-Manager and Managing Director
- 2002 to Present: Retirement Asset Management, LLC - President
- 2000 to 11/2006: Raymond James Financial Services – Registered Representative (Retirement Asset Management served as Branch Office during this time)
- 1996 to 1/2000: FSC Securities Corporation - Registered Representative

**Certifications and Professional Designations:**

- CERTIFIED FINANCIAL PLANNER™ - 2006: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of David Welty. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. David Welty is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

David Welty receives compensation for providing advisory services solely from his responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Mr. Welty. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

**Item 1 – Cover Page**

**Lars Lee Phillips, CFA, CFP®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

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Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about Lars Lee Phillips that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Lars Lee Phillips is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Lars Lee Phillips**

Year of Birth: 1988

**Education:**

- University of Washington; BA Business Administration (Formal Options in Finance and Marketing)

**Business Experience:**

- 2/2017 to Present: RAM Investment Partners, LLC – Lead Advisor
- 4/2012 to 2/2017: RAM Investment Partners, LLC – Associate Advisor
- 1/2012 to 4/2012: Retirement Asset Management, LLC – Associate Advisor
- 1/2010 to 1/2012: Retirement Asset Management, LLC - Client Services

**Certifications and Professional Designations:**

- Chartered Financial Analyst: 2016 - See last page for certification requirements.
- CERTIFIED FINANCIAL PLANNER™ - 2017: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Lars Lee Phillips. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Lars Lee Phillips is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Lars Lee Phillips receives compensation for providing advisory services solely from his responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Mr. Phillips. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

**Item 1 – Cover Page**

**Nicholas Leo Wright, CFA, CFP®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

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Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about Nicholas Leo Wright that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Nicholas Leo Wright is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Nicholas Leo Wright**

Year of Birth: 1993

**Education:**

- San Diego State University – BS Business Administration (Concentration in Finance)

**Business Experience:**

- 2/2020 to Present: RAM Investment Partners, LLC – Lead Advisor
- 11/2017 to 2/2020: RAM Investment Partners, LLC – Associate Advisor
- 6/2015 to 11/2017: RAM Investment Partners, LLC – Client Service Associate
- 6/2014 to 8/2014: RAM Investment Partners, LLC – Intern

**Certifications and Professional Designations:**

- Chartered Financial Analyst - 2019: See last page for certification requirements.
- CERTIFIED FINANCIAL PLANNER™ - 2020: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Nicholas Leo Wright. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Nicholas Leo Wright is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Nicholas Leo Wright receives compensation for providing advisory services solely from his responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Mr. Wright. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.



**Item 1 – Cover Page**

**Aaren N. Strand, CFP®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

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Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about Aaren Strand that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Aaren Strand is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Aaren Nichole Strand**

Year of Birth: 1987

**Education:**

- Bachelor of Science Degree in Financial Planning – Franklin University

**Business Experience:**

- 09/2021 to Present: RAM Investment Partners, LLC – Lead Advisor
- 01/2018 to 05/2021: Paracle Advisors, LLC – Lead Advisor
- 02/2011 to 01/2018: Paracle Advisors, LLC – Associate Advisor
- 02/2008 to 02/2011: Paracle Advisors, LLC – Client Service Associate
- 12/2006 to 02/2008: McEvoy Oil Company – Project Manager
- 07/2005 to 12/2006: Fuel Source – Accounts Receivable

**Certifications and Professional Designations:**

- CERTIFIED FINANCIAL PLANNER™ – 2017: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Aaren Strand. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Aaren Strand is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Aaren Strand receives compensation for providing advisory services solely from her responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Ms. Strand. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.



Part 2B Form ADV: **Brochure Supplement, March 2025**  
**Item 1 – Cover Page**

**Alexander Ostergard Krider, MBA, CFP®, EA**  
RAM Investment Partners, LLC dba  
Avier Wealth Advisors

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Bellevue, WA 98004  
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*This brochure supplement provides information about Alexander Ostergard Krider that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Alexander Ostergard Krider is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Alexander Ostergard Krider**  
Year of Birth: 1968

**Education:**

- Emory University – BS History
- Westfälische Wilhelms-Universität, Münster, Germany - Executive MBA in Marketing

**Business Experience:**

- 1/2019 to Present: RAM Investment Partners, LLC – Lead Advisor
- 2013 to 2018: AXA Advisors, LLC – Division / Regional Vice President
- 2009 to 2013: AXA Advisors, LLC – Financial Advisor
- 2003 to 2009: Krider Publishing Services – Managing Director

**Certifications and Professional Designations:**

- CERTIFIED FINANCIAL PLANNER™: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Alexander Ostergard Krider. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Alexander Ostergard Krider is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Alexander Ostergard Krider receives compensation for providing advisory services solely from his responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Mr. Krider. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

**Item 1 – Cover Page**

**John Preston Osseward, III, CFA, CFP®, CAIA, FRM®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

10655 NE 4<sup>th</sup> Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about John Preston Osseward that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about John Preston Osseward is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**John Preston Osseward**

Year of Birth: 1988

**Education:**

- University of Washington; BA History

**Business Experience:**

- 8/2018 to present: RAM Investment Partners, LLC – Chief Operating Officer/Chief Compliance Officer
- 2/2015 to 8/2018: RAM Investment Partners, LLC – Associate Advisor
- 3/2014 to 2/2015: RAM Investment Partners, LLC – Client Service Associate
- 7/2013 to 3/2014: Wurts & Associates – Analyst

**Certifications and Professional Designations:**

- Chartered Financial Analyst - 2017: See last page for certification requirements.
- CERTIFIED FINANCIAL PLANNER™ - 2017: See last page for certification requirements.
- Chartered Alternative Investment Analyst - 2014: See last page for certification requirements
- Financial Risk Manager – 2015: See last page for certification requirements

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of John Preston Osseward. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. John Preston Osseward is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

John Preston Osseward receives compensation for providing advisory services solely from his responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, is responsible for all supervision and monitoring of investment advice offered to clients by Mr. Osseward. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

Part 2B Form ADV: **Brochure Supplement, March 2025**

**Item 1 – Cover Page**

**Saloni Gupta. CFP®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

10655 NE 4<sup>th</sup> Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about Saloni Gupta that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Saloni Gupta is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Saloni Gupta**

Year of Birth: 1980

**Education:**

- Bachelor's Degree in Dental Surgery, Dentistry - Government Dental College and Hospital 2005

**Business Experience:**

- 3/2023 to Present: RAM Investment Partners, LLC – Lead Advisor
- 9/2022 to 3/2023: Hightower Advisors – Lead Advisor
- 3/2021 to 9/2022: Highland Private Wealth Management – Investment Advisor Representative
- 2/2020 to 3/2021: Ameriprise Financial Services, LLC – Registered Representative
- 9/2018 to 1/2020: Prevail Wealth Management LLC – Client Relations
- 4/2018 to 9/2018: Private Wealth Management Solutions, LLC – Para Planner

**Certifications and Professional Designations:**

- CERTIFIED FINANCIAL PLANNER™ – 2021: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Saloni Gupta. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Saloni Gupta is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Saloni Gupta receives compensation solely for providing advisory services and from her other responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Ms. Gupta. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

Part 2B Form ADV: **Brochure Supplement, March 2025**  
**Item 1 – Cover Page**

**Alexander James Castaneda, CFP®**  
RAM Investment Partners, LLC dba  
Avier Wealth Advisors

10655 NE 4th Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about Alexander James Castaneda that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Alexander James Castaneda is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Alexander James Castaneda**  
Year of Birth: 1995

**Education:**

- Oregon State University – BA Finance and International Business

**Business Experience:**

- 07/2020 to present      RAM Investment Partners, LLC – Associate Advisor
- 1/2019 to 06/2020:      RAM Investment Partners, LLC – Client Service Associate
- 7/2018 to 12/2018:      RAM Investment Partners, LLC – Intern
- 6/2017 to 8/2017:      RAM Investment Partners, LLC – Intern

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Alexander James Castaneda. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Alexander James Castaneda is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

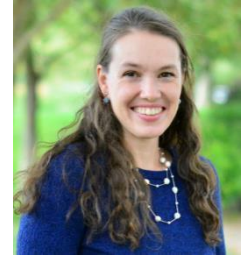
Alexander James Castaneda receives compensation for providing advisory services solely from his responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Mr. Castaneda. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

Part 2B Form ADV: **Brochure Supplement, March 2025**  
**Item 1 – Cover Page**

**Courtney Gehrmann, CFP®**  
RAM Investment Partners, LLC dba  
Avier Wealth Advisors  
10655 NE 4th Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about Marisol Fung that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Courtney Gehrmann is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Courtney Gehrmann**  
Year of Birth: 1987

**Education:**

- Bachelor's Degree in Art History – New York University 2010

**Business Experience:**

- 09/2022 to Present: Avier Wealth Advisors – Associate Advisor
- 06/2021 to 09/2022: Coldstream Wealth Management – Associate
- 08/2018 to 05/2021: Paracle Advisors – Receptionist, Client Service Associate, Associate
- 01/2016 to 07/2018: Filament, LLC – Receptionist, Client Service Associate

**Certifications and Professional Designations:**

- CERTIFICATE IN FINANCIAL PLANNING® – 2023: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Courtney Gehrmann. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Courtney is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Courtney receives compensation for providing advisory services solely from her responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Ms. Gehrmann. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.



Part 2B Form ADV: **Brochure Supplement, March 2025**  
**Item 1 – Cover Page**

**Samantha Torres, CFP®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

10655 NE 4th Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about Samantha Torres that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Samantha Torres is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Samantha Torres**

Year of Birth: 1993

**Education:**

- Bachelor's Degree in International Business, Minor in Entrepreneurship – San Diego State University 2016

**Business Experience:**

- 07/2023 to Present: Avier Wealth Advisors – Associate Advisor
- 05/2022 to 05/2023: Vista Capital Partners, Inc. – Investment Advisor Rep
- 03/2020 to 05/2022: Fisher Investments – Investment Counselor
- 10/2014 to 03/2020: Northwestern Mutual Investment Services LLC – Registered Representative

**Certifications and Professional Designations:**

- CERTIFICATE IN FINANCIAL PLANNING® – 2019: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Samantha Torres. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Samantha is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Samantha receives compensation for providing advisory services solely from her responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Ms. Torres. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

Part 2B Form ADV: **Brochure Supplement, March 2025**  
**Item 1 – Cover Page**

**Marisol Fung, CIMA®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

10655 NE 4th Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 888.200.7759



*This brochure supplement provides information about Marisol Fung that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Marisol Fung is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Marisol Fung**

Year of Birth: 1973

**Education:**

- Bachelor's Degree in Economics – New York University 2000

**Business Experience:**

- 04/2022 to Present: Avier Wealth Advisors – Director of Portfolio Management
- 10/2016 to 03/2022: Dynamic Wealth Advisors – Advisor Support
- 07/2015 to 09/2016: Dynamic Wealth Advisors – Investment Advisor Representative
- 12/2013 to 09/2016: Hanei Private Wealth Advisors – Investment Associate
- 11/2011 to 11/2013: Purshe Kaplan Sterling Investments – Registered Representative
- 10/2011 to 11/2013: Wealth Trust - Arizona – Investment Associate

**Certifications and Professional Designations:**

- CERTIFIED INVESTMENT MANAGEMENT ANALYST® – 2020: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Marisol Fung. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Marisol is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Marisol receives compensation for providing advisory services solely from her responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Ms. Fung. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

**Part 2B Form ADV: Brochure Supplement, March 2025**  
**Item 1 – Cover Page**

**Katelynn Toth, CFP®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

10655 NE 4th Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 425.531.7336



This brochure supplement provides information about Katelynn Toth that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Katelynn Toth is available on the SEC's website at <http://www.adviserinfo.sec.gov>.

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

**Katelynn Toth**

Year of Birth: 2000

**Education:**

- Bachelor's Degree in Financial Economics – Western Washington University 2021

**Business Experience:**

- 05/2024 to Present: Avier Wealth Advisors – Associate Adviser
- 12/2021 to 03/2024: APCM Wealth Management for Individuals – Associate Financial Advisor
- 01/2021 to 12/2021: APCM Wealth Management for Individuals – Intern

**Certifications and Professional Designations:**

- CERTIFICATE IN FINANCIAL PLANNING® – 2024: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Katelynn Toth. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Katelynn is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Katelynn receives compensation for providing advisory services solely from her responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Ms. Toth. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.



Part 2B Form ADV: **Brochure Supplement, March 2025**

**Item 1 – Cover Page**

**Tiffany Chiang Stoner, CFP®**  
RAM Investment Partners, LLC dba  
Avier Wealth Advisors  
  
10655 NE 4th Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 425.531.7336



*This brochure supplement provides information about Tiffany Stoner that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Tiffany Stoner is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Tiffany Chiang Stoner**

Year of Birth: 1983

**Education:**

- Bachelor's Degree in Economics – University of Utah 2013

**Business Experience:**

- 09/2024 to Present: Avier Wealth Advisors – Lead Advisor
- 04/2022 to 09/2024: Badgley Phelps Wealth Managers – Wealth Manager
- 07/2019 to 04/2022: Brighton Jones – Associate Advisor
- 03/2018 to 03/2019: Charles Schwab & Co., Inc. – VP, Financial Consultant; Dual Employee
- 01/2016 to 09/2016: Fidelity Brokerage Services LLC/Strategic Advisers, Inc. – Financial Representative
- 11/2010 to 01/2016: Fidelity Brokerage Services LLC – Financial Representative

**Certifications and Professional Designations:**

- CERTIFICATE IN FINANCIAL PLANNING® – 2017: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Tiffany Stoner. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Tiffany is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Tiffany receives compensation for providing advisory services solely from her responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Ms. Stoner. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

Part 2B Form ADV: **Brochure Supplement, March 2025**

**Item 1 – Cover Page**

**Raphael Luis De Ocampo, CFP®**

RAM Investment Partners, LLC dba  
Avier Wealth Advisors

10655 NE 4th Street, Suite 500  
Bellevue, WA 98004  
425.467.1011 | 425.531.7336



*This brochure supplement provides information about Raphael De Ocampo that supplements the RAM Investment Partners, LLC Part 2A Brochure. Please contact JP Osseward, CCO at 425- 467-1011 if you did not receive a copy of that Brochure or if you have any questions about the contents of this supplement. Additional information about Raphael De Ocampo is available on the SEC's website at <http://www.adviserinfo.sec.gov>.*

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

**Raphael Luis De Ocampo**

Year of Birth: 1999

**Education:**

- Bachelor's Degree in Financial Economics – Western Washington University, 2020

**Business Experience:**

- 01/2025 to Present: Avier Wealth Advisors – Associate Advisor
- 01/2022 to 02/2025: Avier Wealth Advisors – Client Service Associate
- 06/2020 to 10/2021: Stabbert Maritime – Accountant

**Certifications and Professional Designations:**

- CERTIFICATE IN FINANCIAL PLANNING® – 2024: See last page for certification requirements.

**Item 3 – Disciplinary Information**

RAM Investment Partners, LLC is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Mr. De Ocampo. No events have occurred that are applicable to this item.

**Item 4 – Other Business Activities**

RAM Investment Partners, LLC is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients. Mr. De Ocampo is not actively engaged in any such activities.

**Item 5 – Additional Compensation**

Mr. De Ocampo receives compensation for providing advisory services solely from his responsibilities at RAM Investment Partners, LLC and from no other source.

**Item 6 – Supervision**

Dave Welty, our Managing Director, in concert with JP Osseward, our CCO, is responsible for all supervision and monitoring of investment advice offered to clients by Mr. De Ocampo. They can be reached at 425-467-1011. While the underlying securities within accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines.

## **Reference Page for all certification designations**

**Certified Financial Planner:** The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance retirement planning and estate planning. In addition to passing the CFP certification exam, candidates must also complete qualifying work experience and agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards.

**Chartered Financial Analyst:** The Chartered Financial Analyst charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations, which takes most candidates between two and five years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### **High Ethical Standards**

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders –often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### **Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

**Chartered Alternative Investment Analyst:** The CAIA Charter, recognized globally, is administered by the Chartered Alternative Investment Analyst Association and requires a comprehensive understanding of core and advanced concepts regarding alternative investments, structures, and ethical obligations. To qualify for the CAIA Charter, finance professionals must complete a self-directed, comprehensive course of study on risk-return attributes of institutional quality alternative assets; pass both the Level I and Level II CAIA examinations at global, proctored testing centers; attest annually to the terms of the Member Agreement; and hold a US bachelor's degree (or equivalent) plus have at least one year of professional experience or have four years of professional experience. Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related fields. Once a qualified candidate completes the CAIA program, he or she may apply for CAIA membership and the right to use the CAIA designation, providing an opportunity to access ongoing educational opportunities.



**Financial Risk Manager:** The FRM designation is a professional certification offered by the Global Association of Risk Professionals (GARP). For 20 years, the FRM has set the global standard for risk management. Developed by the world's leading risk practitioners, the designation signifies a mastery of the essential skills and knowledge needed to help organizations succeed in today's rapidly changing financial landscape. The FRM designation covers the following topics: Market Risk Measurement and Management, Credit Risk Measurement and Management, Operational and Integrated Risk Management, and Investment Management. The designation is awarded after a candidate has completed two tests and demonstrated 2 years of related work experience.

**Enrolled Agent:** The EA designation is a professional credential awarded by the IRS which allows its holder to work as a tax specialist authorized by the federal government to represent taxpayers before the IRS. To hold the credential, applicants must join the Chartered Tax Professional certificate program, get a preparer tax identification number (PTIN), take the Special Enrollment Examination (SEE), and register as an Enrolled Agent with the IRS. To maintain the credential, the agent must participate in a continuing education program requiring 72 hours of courses taken every two years, at least 16 of which must be done in each of those two years.

**Equity Compensation Associate:** the CEP Institute's new designation for individuals in equity compensation. An ECA is qualified in the fundamentals of equity compensation taxation, plan design, law, and very basic accounting, and can address these topics intelligently with equity plan participants. The ECA designation is for individuals interacting with equity plan participants, whether working at a company that issues equity compensation, an equity plan services organization, or a wealth management firm, and for individuals who intend to become a CEP. For those who do not need full CEP certification, an ECA designation is a way to demonstrate knowledge of equity compensation fundamentals.

**Certified Investment Management Analyst® (CIMA®):** The certification is the peak international, technical portfolio construction program for investment consultants, analysts, financial advisors and wealth management professionals. CIMA® certification continues to be the highest level of advanced investment education for client-facing advisors.