

Part 2A of Form ADV: Firm Brochure

Oakmont Capital Management, LLC

also doing business as BilkeyKatz Investment Consultants

856 Allegheny River Boulevard
Oakmont, PA 15139

(412) 828-5550
(844) 376-4244

www.oakmontcap.com
www.bilkeykatz.com

March 30, 2026

This Brochure provides information about the qualifications and business practices of Oakmont Capital Management, LLC ("Oakmont Capital" or "Firm"). If you have any questions about the contents of this Brochure, please contact us at (412) 828-5550. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Oakmont Capital is a registered investment advisor. Registration as an investment advisor does not imply any level of skill or training. The written communications in this Brochure provide you with information which can be used to determine whether to hire or retain Oakmont Capital and/or BilkeyKatz Investment Consultants.

Additional information about Oakmont Capital is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site using the Oakmont Capital CRD number of 128939.

Item 2. – Material Changes

Material changes to this Brochure, as applicable, will be summarized in this section.

Since this Brochure was last filed with the SEC on March 27, 2025 as part of an annual update, the following material changes have occurred to Oakmont Capital Management, LLC and/or the services offered by its representatives:

- Oakmont Capital Management, LLC and BilkeyKatz Investment Consultants, Inc. ("BilkeyKatz") have entered into a merger agreement with an effective date of October 1, 2025. This Brochure covers the aggregated business practices of both entities, which operate a single advisory business within a single legal entity. The merged entity is legally known as Oakmont Capital Management, LLC, also doing business as BilkeyKatz Investment Consultants. Throughout the remainder of this Brochure, the merged entity will be referred to as "Oakmont Capital" or the "Firm."

- Oakmont Capital has relocated its principal place of business to 856 Allegheny River Boulevard, Oakmont, PA 15139, effective September 30, 2025. The Firm's contact information has not changed and is listed on the cover page of this Brochure.

- Item 4. has been amended to update the Firm ownership changes resulting from the merger. The ownership group has been expanded from two to four individuals.

- Item 4. has been amended and expanded to describe the scope of advisory services offered by the Firm.
  - Institutional & Outsourced Chief Investment Officer ("OCIO") Consulting Services
  - Private Wealth Advisor
  - Family Office Services

- Items 4., 5., 12. and 14. have been updated to remove language regarding Zoe Financial, Inc. and the Zoe Wealth Management Platform. Oakmont Capital no longer engages or utilizes either. Additionally, Item 12. has been amended to remove Apex Clearing Corporation as a custodian currently used or offered to clients.

- Item 5. has been amended to expand disclosures related to the fees associated with the investment advisory and consulting services offered by the Firm. For Clients with a written agreement in place prior to the effective merger date of October 1, 2025 with either BilkeyKatz or Oakmont Capital Management, LLC will experience no changes to their agreed-upon services or fee structure as a result of the merger.

- Item 8. has been expanded to include the risks associated with Cybersecurity and Artificial Intelligence.

- Item 10. has been expanded to include Other Conflicts of Interest primarily due to the BilkeyKatz merger.

If you need further information regarding any material changes or an additional copy of this Brochure, please contact Ms. Gina Kovatch, Chief Compliance Officer, at (412) 828-5550.

Table of Contents

Item 2. – Material Changes 2
Table of Contents 3
Item 4. – Advisory Business 4
Item 5. – Fees and Compensation 8
Item 6. – Performance-Based Fees and Side-By-Side Management 11
Item 7. – Types of Clients 11
Item 8. – Methods of Analysis, Investment Strategies and Risk of Loss 11
Item 9. – Disciplinary Information 15
Item 10. – Other Financial Industry Activities and Affiliations 15
Item 11. – Code of Ethics 16
Item 12. – Brokerage Practices 17
Item 13. – Review of Accounts 19
Item 14. – Client Referrals and Other Compensation 19
Item 15. – Custody 20
Item 16. – Investment Discretion 21
Item 17. – Voting Client Securities 21
Item 18. – Financial Information 22

Item 4. – Advisory Business

Oakmont Capital Management, LLC is an investment adviser registered with the SEC and primarily provides discretionary and non-discretionary advisory services to institutions and individuals (each a "Client"). The Firm was founded in 2002 and is a limited liability company organized under the laws of the Commonwealth of Pennsylvania.

BilkeyKatz Investment Consultants, Inc. entered into a merger agreement with Oakmont Capital Management, LLC with an effective date of October 1, 2025. BilkeyKatz Investment Consultants, Inc. was originally formed in 2002 and was previously an investment advisor registered with the SEC. The merged entity is now legally known as Oakmont Capital Management, LLC, also doing business as BilkeyKatz Investment Consultants. Throughout this Brochure, the merged entity will be referred to as "Oakmont Capital," "the Firm," "We," or "Us."

It is important to note that the business practices described in this Brochure are intended to convey the post-merger activities of the combined businesses of Oakmont Capital and BilkeyKatz operating as a single advisory firm. For Clients who have engaged Oakmont Capital or BilkeyKatz prior to the effective merger date, each Client's terms of agreement, scope of services, and fee arrangements, among other relationship factors, may vary to some extent from those described in this Brochure. Clients should refer to their executed agreement pre-merger for details related to their current terms of service and relationship governance. Any questions should be directed to Ms. Gina Kovatch, Chief Compliance Officer, at gkovatch@oakmontcap.com.

As of December 31, 2025, Oakmont Capital had approximately $9,475,683,565 in assets under advisement, of which $3,086,575,180 were regulatory assets under management with $532,091,939 being discretionary and $2,554,483,241 being non-discretionary.

Primary Service Offerings

Oakmont Capital and its representatives have three primary offerings:

(1) Institutional & Outsourced Chief Investment Officer ("OCIO") Consulting Services

(2) Private Wealth Advisor

(3) Family Office Services

Prior to Oakmont Capital rendering any of these services, Clients are typically required to enter into one or more written agreements with Oakmont Capital that set forth the relevant terms and conditions of the advisory relationship (the "Agreement"). The following is a description of these services, to whom they are offered, and how they are administered. The Client or Oakmont Capital is entitled to terminate the Agreement with written notice to the other. The terms and conditions associated with termination are detailed within each Client's Agreement.

Outsourced Chief Investment Officer & Institutional Consulting Services

Oakmont Capital offers Outsourced Chief Investment Officer ("OCIO") and Institutional Consulting Services to a variety of institutions and high net worth individuals including, but not limited to, retirement plans, charitable organizations, business entities, healthcare organizations, and personal trusts and estates. The services include, but are not limited to:

- Discretionary and non-discretionary management of investable assets

- Advice on fiduciary policies, procedures, and objectives
- Asset allocation design and implementation
- Drafting and monitoring of Investment Policy Statements
- Spending policy design and management
- Review and monitoring of OCIOs
- Identification and implementation of other investment managers or product providers
- Consolidated portfolio performance reporting and peer group analysis
- Asset liability studies and Monte Carlo simulations
- Due diligence and fee negotiations of service providers
- Return pattern management and hedging programs
- Topic specific research (macro factors, government policies, market events, etc.)
- Trustee training and education
- One-time and ad-hoc projects on a specific area of focus or need including but not limited to vendor searches, expense reviews, asset-liability studies, and OCIO searches.

Oakmont Capital can provide each of these services separately or collectively. When providing such services, the Client or authorized representative designated by the governing documents of the entity or family (e.g., the plan sponsor, trustee, or named fiduciary) will: (i) make the decision to retain Oakmont Capital; (ii) agree to the scope of the services that Oakmont Capital will provide; and (iii) in the absence of any discretionary arrangements, make the ultimate decision to accept any of the recommendations that Oakmont Capital provides. The authorized representatives or plan fiduciaries are free to seek independent advice about the appropriateness of any recommended action or service.

Private Wealth Advisor

When acting as a Private Wealth Advisor, Oakmont Capital renders investment advisory services to individuals, high-net worth families, and their associated entities on an independent and collegial basis with the Firm's actions being governed by the risk/return objectives of the Client, as well as the terms and conditions of the Investment Management Agreement. The trading authority of Oakmont Capital often includes, but is not limited to, the buying and selling of individual securities, the reinvestment of dividends/interest, and the deployment of cash balances. Typically, other than the withdrawal of the investment advisory fee as described in Item 5. of this Brochure, Oakmont Capital does not have the discretion or authority to withdraw, possess, or contribute additional assets to an investment account of a Client. When implementing an investment strategy, the Firm cannot guarantee success. Clients should be aware that all forms of investing have the potential for loss, including their initial principal amount.

Risk/return investment objectives, capital market assumptions, and portfolio size help determine the proper investment strategy for a Client. Typically, both active and passive investment styles are considered in the process. An active investment strategy seeks to outperform a specific index or benchmark through security selection and other trading activities. A passive investment strategy seeks to track and replicate the performance of a specific index. Depending upon Client preferences, portfolios can be managed in relation to a blended benchmark, a specific return level, or an expected level of inflation.

When appropriate, an Investment Policy Statement ("IPS") is drafted to help guide the investment process and relationship expectations. It typically outlines the portfolio constraints, liquidity considerations, and performance standards. For Clients who have an existing IPS in place upon engagement, Oakmont Capital will provide a review which, when appropriate, will include recommendations for modification. Clients are encouraged to notify Oakmont Capital promptly regarding any material changes to their financial circumstances and/or investment preferences. These changes, when appropriate, can be incorporated by amending the IPS.

Depending on the needs and desires of the Client, Oakmont Capital may also provide financial planning as part of the investment advisory services offered. A financial plan typically addresses any or all of the following areas: retirement glidepath, financial budgeting, debt management, charitable giving, retirement & educational savings, cash flow management, tax analysis, and estate design considerations.

To prepare a financial plan, Oakmont Capital will gather information through Client discussions, document reviews, and modeling. These activities help Oakmont Capital prepare a financial profile of the Client and identify any future objectives and the amount of risk a Client is willing to assume. If a Client chooses to implement a financial plan designed by Oakmont Capital, they are encouraged to work closely with an attorney, accountant, insurance agent, and/or other relevant professionals to review the appropriateness of the plan and recommendations. The implementation of the plan is at the sole discretion of the Client.

Family Office Services

Oakmont Capital assists families in developing investment programs to meet the wealth needs of both current and future generations while accommodating the existing business and philanthropic initiatives of the family. In many instances, Oakmont Capital acts as the family's OCIO and collaboratively integrates investment advisory services into the accounting, legal, and financing infrastructure of the family. When appropriate, the use of both public and private securities are incorporated into the portfolio design process.

The Family Office services offered by Oakmont Capital are customizable and are governed by a written Agreement which can be terminated with written notice to the Firm. The terms and conditions associated with termination are detailed within each Client's Agreement.

Types of Investments

Oakmont Capital offers advice on various types of investments including, but not limited to, the following:

- Equity securities (exchange traded or over-the-counter listed)
- Investment companies (mutual funds)
- Collective Investment Trusts
- Common trust funds and commingled funds
- Corporate debt securities (investment grade and non-investment grade)
- Certificates of deposit and commercial paper of various institutions
- Local and state municipal securities
- Exchange traded funds (ETFs)
- Mortgage and asset backed securities
- United States government or agency securities
- Option contracts on securities, indices, and/or commodities
- Warrants and Restricted Stock Units (RSUs)
- Private partnerships or investment funds including venture capital, private equity, hedge funds, real estate, commodity, oil & gas, etc.
- Any other type of investment deemed suitable or held in a Client portfolio

Depending on the situation, Oakmont Capital will advise on or analyze a security based upon it being a stand-alone investment and/or part of a diversified or concentrated portfolio.

Clients have the ability to impose restrictions on the type of securities Oakmont Capital is permitted to purchase on their behalf, or recommend for investment, by providing any such restrictions to Oakmont

Capital in writing. The Client can add or remove these restrictions as needed or desired.

Oakmont Capital does not participate in any wrap fee programs.

Attorney and Accounting Firm Arrangements

Oakmont Capital has negotiated arrangements with certain legal and accounting firms under which Oakmont Capital has agreed to cover the costs of certain professional services provided by these firms to designated Clients. The cost of these services is paid from the advisory fees collected by Oakmont Capital. No Client is obligated to engage these professionals or to receive their covered legal and/or accounting services. The opportunity to receive these services is generally open to Clients with a minimum annual fee paid to Oakmont Capital of $10,000 or greater. The minimum annual fee required for eligibility is subject to negotiability at the discretion of Oakmont Capital. The Client can terminate the services provided by the legal and/or accounting firm at any time with written notification to the firm.

Ownership and Control of Oakmont Capital Management, LLC

As a limited liability company, Oakmont Capital Management, LLC is owned by four individuals with Mr. Lawrence "Jon" Koteski acting as the Managing Partner. No other member directly or indirectly controls the Firm. Mr. Koteski acquired the Managing Partner title in June 2002 and his CRD # is 2765692. As of the date of this Brochure, Mr. Koteski owns a majority of the outstanding interests in the Firm with Darrin K. Duda, Patrick W. Fisher, and Marc C. De Fife each owning minority interests.

When Acting as an Adviser to Retirement Plan Participants or Outside Accounts

Oakmont Capital can advise a participant within a retirement plan. When a current or prospective Client is separating from service from an employer and is covered by a retirement plan, he or she is typically presented with four options: (i) leaving their assets with the employer plan, (ii) rolling over the assets into a new employer's plan, (iii) rolling over the assets into an Individual Retirement Account ("IRA"), or (iv) cashing out the account (which could result in tax consequences and/or penalties). Oakmont Capital can recommend that a Client rolls over the assets into an IRA in which Oakmont Capital receives an asset-based or fixed fee. Conversely, if a Client or prospective Client chooses to leave the assets with their former employer or roll them into a new employer plan, Oakmont Capital does not receive any compensation or, the compensation can be lower than if the Client rolls the assets into an IRA managed by Oakmont Capital. Therefore, Oakmont Capital has an economic incentive to encourage a Client or prospective Client to rollover the assets into an IRA managed by the Firm. Oakmont Capital considers a variety of factors before recommending a rollover, including but not limited to, available fees and expenses, investment options, penalty-free withdrawals, creditor and judgment protection, employer stock appreciation, and required minimum distributions. No Client is under any obligation to rollover plan assets into an IRA or to engage Oakmont Capital.

Current and prospective Clients considering a rollover from a qualified employer-sponsored retirement plan to an IRA, or from an IRA to another IRA, are encouraged to consider and investigate the factors for both advantages and disadvantages of the rollover action, including costs and applicable taxes.

Pursuant to Department of Labor regulations, Oakmont Capital is required to acknowledge in writing that in regard to those Clients for which it serves as an Investment Manager as defined in Section 3(38) of ERISA, it is a Fiduciary as defined in Section 3(21)(A) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA") and Section 4975 of the Internal Revenue Code of 1986, as amended (the "Code"), as applicable. When Oakmont Capital provides investment advice to a Client regarding a retirement

plan or IRA, the Firm and its representatives are a fiduciary within the meaning of Title I of ERISA and the Code, as applicable.

If a Client account is maintained on behalf of or in connection with a qualified employer-sponsored retirement plan subject to ERISA, as amended, or similar government regulation, pursuant to which the Client has sole authority to direct the investment thereof, Client acknowledges and understands that the investment discretion of Oakmont Capital will be limited to the investment alternatives provided by the plan and that Oakmont Capital will have no duty, responsibility, or liability for plan assets that are not included in the Client account. The Client also agrees to furnish Oakmont Capital with a copy of the documents governing the plan upon request. In the event that the plan sponsor or custodian will not permit Oakmont Capital direct access, the Client will provide Oakmont Capital with the password and/or log-in information to effectuate any transactions in the individual account of the Client pertaining to such plan. Oakmont Capital may only accept the Client's password and/or log-in information for the sole purpose of effecting transactions in the Client's account, and Oakmont Capital will not have, nor will it accept any authority to effectuate any other type of transactions or changes, including but not limited to, the changing of beneficiaries or effecting account disbursements or transfers to any 3rd party or entity. The provision of the password and/or log-in information by the Client to Oakmont Capital shall constitute authorization by the Client for Oakmont Capital to access the individual account of the Client within the plan. Client further acknowledges and understands that Oakmont Capital will not receive any communication from the plan sponsor or custodian, and it shall remain the exclusive obligation of the Client to notify Oakmont Capital of any changes or restrictions pertaining to the individual account of the Client.

Item 5. – Fees and Compensation

Outsourced Chief Investment Officer & Institutional Consulting Service Fees

For ongoing and continuous OCIO and Consulting relationships, Oakmont Capital has two negotiable fee structures available to clients. The first being a fixed annual fee with a minimum of $50,000 and the second being an asset-based fee ranging from 3 to 100 basis points with a minimum aggregate investable amount of $500,000. Considerations for determining the fee structure and amount include, but are not limited to: Client preference, the amount of resources required by the Firm to service the Client, total assets being placed under advisement, and the agreed-upon services.

A fixed fee or retainer is paid quarterly in arrears and the amount is determined by multiplying the total annual dollar amount of the fee by one fourth. Typically, the fee will cover all travel expenses and administrative costs associated with the relationship.

The asset-based fee is also paid quarterly in arrears, and the amount is based upon the market value of the assets in which Oakmont Capital is advising or consulting on as reported by the custodian(s), product sponsor, or as reasonably calculated by Oakmont Capital at the conclusion of the calendar quarter, multiplied by one fourth of the annual basis point fee (3 to 100 basis points).

For project-based relationships with a defined objective or term, Oakmont Capital will charge a flat hourly fee ranging from $100 to $750 or a fixed fee with a minimum of $50,000 per project. These fees are negotiable and determined based upon the complexity of the project, the time associated with completing the project, and the number of Oakmont Capital representatives assigned to it. A portion of the agreed upon fee will be paid by the Client at the initiation of the project with the remainder being paid at the completion of the project. Both payments are typically made through invoicing. If the project is scheduled to be implemented over multiple quarters, interim fees can be charged quarterly (or over another pre-determined schedule) and netted against the total fee of the project.

Fees Charged to Legacy BilkeyKatz Investment Consultants Clients

As stated in Item 4. of this Brochure, the services and fees of the BilkeyKatz Investment Consultant Clients who entered into a written agreement prior to the effective merger date of October 1, 2025 will remain unchanged unless updated post-merger in writing. Typically, these legacy Clients are charged an annual fixed retainer fee and are billed quarterly in advance. The fees are then commonly paid via check, the Automatic Clearing House ("ACH"), or wire. They are not typically debited directly from the investment account. Clients who engaged BilkeyKatz prior to the merger with Oakmont Capital should refer to their executed Agreement for details related to their current terms of service and/or advisory and consulting fees.

Private Wealth Advisor and Family Office Fees

For rendering investment advisory and management services to individuals, families, and entities, Oakmont Capital earns an annual investment advisory fee. This fee is generally paid each calendar quarter in arrears and is detailed in the Client's Agreement. The fee is determined by the following annual fee schedule and breakpoints:

1.00% on first $3,000,000 of Client assets;
0.85% on next $3,000,000 of Client assets;
0.70% on Client assets over $6,000,000.

Oakmont Capital reserves the right to waive, reduce, or increase a Client's fee based upon certain criteria, including but not limited to, the type of Client, anticipated future earnings, expected contributions and withdrawals, total assets being managed, affiliated accounts, and relationship complexity.

The dollar value of the quarterly payment is based upon the market value of assets in the investment account as reported by the custodian(s), product sponsor, or as reasonably calculated by Oakmont Capital at the conclusion of the calendar quarter, including cash, multiplied by one fourth of the annual fee percentage as indicated in the fee schedule above.

An alternative to this fee structure is a "fixed fee" arrangement. It is negotiable with a minimum of $50,000 per annum. In determining the fixed fee, Oakmont Capital considers such items as the total market value of the Client's assets, professional time required to manage the investment account, and services needed.

Market Value Differences

The market value used by Oakmont Capital in calculating investment advisory or consulting fees can vary from the market value reported by the custodian(s) and product sponsor(s) due to the timing differences of dividends, interest, transfers, merging accounts, and/or other distributions and proceeds. When this occurs, Oakmont Capital will use its discretion and software inputs to determine what is believed to be a fair market value of the investment account.

Impact of Intra-quarter Contributions, Withdrawals, and Terminations on Fee Calculations

For fee calculation considerations, Oakmont Capital does not typically adjust quarter-end market values for intra-quarter contributions and withdrawals. However, when these cash flows represent a significant portion of a Client's investment account, Oakmont Capital, at its sole discretion, can waive or prorate the fee associated with the cash flows. When the proration is applied, it is based upon the total days in the quarter relative to when the contribution and/or withdrawal occurred. Additionally, if a Client relationship is terminated prior to quarter-end, the advisory or consulting fee is prorated based upon the

total number of days in the quarter and the day in which the termination is effective.

Private Partnerships or Privately Issued Securities Considerations when Calculating Advisory Fees

When a Client investment account contains a private partnership or privately issued security, Oakmont Capital will record and maintain the initial amount invested (cost) as its value. Oakmont Capital will increase or decrease this value when written notification is given by the private security sponsor or from the Client indicating the value has changed, including contributions and withdrawals. Absent written notification, the value of the security will remain static for an extended period of time. For privately issued securities with few or no market inputs to assess its value or for which a valuation cannot reasonably be determined, Oakmont Capital, with the Client's consent and agreement, will charge a flat fee with respect to advisory services provided regarding the security, rather than base the fee on a percentage of the security's valuation.

Direct Fee Deductions from Custodian and/or Brokerage Accounts

Through written agreement with the Client, the custodian of the Client's account(s), upon instruction from Oakmont Capital, will withdraw the quarterly or other agreed upon investment advisory or consulting fee directly from the Client's investment account(s). When multiple custodial or brokerage accounts comprise the Client's investment account, Oakmont Capital, unless directed by the Client in writing, will have sole discretion in determining the custodial account or accounts in which the investment advisory or consulting fee is withdrawn. As a result, Oakmont Capital has the authority to direct the custodian to withdraw the total fee from a single account or from a combination of multiple accounts. Furthermore, the timing at which the fee is withdrawn from an account or accounts after it is earned is at the discretion of Oakmont Capital.

Other methods in which a Client can submit an investment advisory or consulting fee to Oakmont Capital for payment include check remittance, payment through ACH, or a direct wire deposit. When one of these alternative fee submissions methods are elected, the Client will notify Oakmont Capital in writing.

Fee Changes

Oakmont Capital reserves the right to propose changes in fees (increases or decreases) when the scope of services is subject to a material change or when a fee change is deemed necessary after a review. Proposed and implemented fee changes will be governed by the Client Agreement.

General Fee Notice

Oakmont Capital does not collect advisory fees prior to providing any investment advisory services. Furthermore, all fee structures are considered negotiable. The Client or Oakmont Capital is entitled to terminate any Agreement with written notice to one another. The terms and conditions associated with termination are detailed within each Client Agreement.

When appropriate, Oakmont Capital will review the investment accounts of affiliated entities or households for aggregation considerations for the purpose of meeting fee breakpoints or determining a flat fee or retainer. For example, this can occur when the Firm services accounts on behalf of minor children of current Clients, individual and joint accounts of spouses, and affiliated portfolios of the same family, entity, or non-profit.

The fees charged by Oakmont Capital are exclusive of any brokerage commissions, transaction fees, and other related costs imposed by custodians, brokers, and third-party service providers. When these fees do

exist, they will be incurred by the Client and can include, but are not limited to, custodial fees, deferred sales charges, odd-lot differential costs, fixed income mark-ups, transfer taxes, ACH and wire transfer fees, paper statement & confirmation fees, Automated Customer Account Transfer Service ("ACAT") fees, and domestic/foreign taxes on security transactions. Oakmont Capital will not receive any portion of these fees. Please see Item 12. of this Brochure for more information regarding Brokerage Practices.

Furthermore, advice offered by Oakmont Capital may involve pooled investments including, but not limited to, mutual funds, real estate investment trusts, unitized investment trusts, exchange traded funds, master limited partnerships, private partnerships, and closed end mutual funds. The fees and expenses associated with these pooled investments are incurred by the Client and separate from the investment advisory or consulting fees paid to Oakmont Capital. These fees are often described in detail in the prospectuses and offering memorandums of the pooled vehicles and will generally include management fees, operational expenses, and performance-based fees (if any). Oakmont Capital does not share in any portion of these fees. To fully understand the total amount of fees paid for implementing an investment strategy, the Client should review all fees associated with the pooled investments, the engagement of Oakmont Capital, and the costs associated with any other service provider involved, including broker-dealers and custodians.

In lieu of an eleemosynary fee discount, and in its sole discretion, Oakmont Capital in certain cases supports a non-profit Client by participating and contributing to specific fundraising events that are believed to further the Client's mission. All such actions are performed independently, and the Firm believes they do not affect the fiduciary relationship or the terms of the Client Agreement.

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

Oakmont Capital does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of the assets in the Client investment account).

Item 7. – Types of Clients

Oakmont Capital offers investment advisory services to a range of Clients, including but not limited to families, individuals, trusts, estates, charitable organizations, pension and profit-sharing plans, health care systems, corporations and other business entities. For discretionary accounts, the minimum account size Oakmont Capital will accept in aggregate investable assets is $500,000. At the discretion of Oakmont Capital, smaller accounts and/or relationships can be accepted.

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

Investment strategies implemented by Oakmont Capital can be customized, part of a model strategy (implemented for multiple Clients), or a combination of both. Oakmont Capital will make this determination based upon discussions with the Client and the amount of investable assets the Client is placing under the discretion or oversight of Oakmont Capital. The instruments used to implement these strategies are identified in Item 4. of this Brochure – Types of Investments.

When performing security analysis, Oakmont Capital will use a variety of techniques including fundamental, technical, and relative value analysis.

Fundamental analysis is based upon public financial and operational information available for a security. This includes, but is not limited to, such items as debt levels, earning capabilities, management experience, free cash flow levels, yield maintenance, and historical/projected growth. Oakmont Capital can use such

measures to determine if a security is under or overvalued. This type of fundamental analysis, however, does not attempt to anticipate market movements. This presents a potential risk as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.

Oakmont Capital, in certain cases, will also use technical analysis to compare historical volume and price movements of a security to its present-day valuation or moving averages). Examples of such measures include, but are not limited to, 52-week price levels, volatility of price movements, up and down volume levels, graphical charts, and the identification of support and resistance levels. These measures can help determine trends which might indicate future price movements. Technical analysis does not consider the underlying financial condition of a company. This presents certain risks because a poorly managed or financially unsound company has the potential to underperform regardless of market movement.

Relative value analysis allows Oakmont Capital to determine the value of a specific security in relation to other securities and market proxies with similar characteristics. Such measures include, but are not limited to, price-to-earnings[1], price-to-book[2], debt-to-equity[3], price-to-sales[4], return on assets[5], return on equity[6], free cash flow-to-equity[7], and interest coverage ratios[8]. Oakmont Capital will use such measures to determine if a security is under or overvalued relative to another security or market.

Sources of information used in analyses include security filings, broker's quotes, industry news, and security databases. In some situations, the information is maintained and/or populated by a third-party. Even though Oakmont Capital believes this information to be accurate and reliable, it cannot be guaranteed to be complete or error free.

When valuing a security and/or formulating an investment strategy, Oakmont Capital makes a variety of macro and micro assumptions that may not be representative of what will happen in the future. Even though these assumptions are made with positive intent, they may misrepresent future events leading to the loss of capital, principal, or investment account market value. This can include risks associated with the breakdown of asset class correlations, inflation projections, currency movements, liquidity assumptions, foreign securities, cryptocurrency, and global events.

Oakmont Capital, at its discretion, will engage in frequent trading over a short period of time. When this occurs, the Client can be exposed to transaction costs (e.g. brokerage fees, redemption fees) and tax consequences that are not present when Oakmont Capital is not frequently trading. These transaction and tax costs can lower the return associated with the actual investment and the Client's combined investment account. It is difficult for a Client to determine when Oakmont Capital will enter into a period in which increased trading will occur.

[1] Also known as a "P/E Ratio". It is a ratio measuring a company's current share price relative to the company's earnings per share.
[2] A financial ratio used to compare a company's current market price to its book value, evaluating how the company is valued by comparison of the price of outstanding shares to the net assets of the company.
[3] A financial ratio indicating the relative proportion of shareholder equity and debt used to finance a company's assets.
[4] A valuation metric for stocks, which compares a company's stock price to its revenues, an indicator of the value placed on each dollar of a company's sales or revenues.
[5] An indicator of how profitable a company is relative to its total assets.
[6] A measure of a company's profitability in relation to the equity or net assets minus liabilities.
[7] A measure of how much cash can be distributed to the equity shareholders as dividends or stock buybacks, after all expenses, reinvestments and debt are satisfied.
[8] A ratio measuring how many times a company can cover its current interest payment with its available earnings.

Certain Clients authorize Oakmont Capital to use margin while implementing an investment strategy. The use of margin can increase the possibilities for profit and the risk of loss. Among other factors, the rates at which the Client can borrow along with the performance of the securities purchased on margin will affect the investment return experienced by the Client. Margin borrowing is usually obtained from the Client's broker-dealer and is typically secured by the account in which the Client's securities are held. Under certain circumstances, the margin lender has the option to demand an increase in the collateral that secures the Client's obligations, and if the Client is unable to provide additional collateral, the lender can then liquidate assets held in the account to satisfy the Client's margin obligation. A precipitous drop in the securities comprising the market is an example of when this can occur.

Similar to the risks associated with margin, Oakmont Capital may use securities, such as exchange traded funds (ETFs), that are leveraged multiple times, which are designed to magnify the daily price movement associated with a particular sector, industry, market index, currency, or commodity. These securities increase the possibility for profit and the risk loss factor relative to the multiple of leverage versus the non-levered position. These are speculative instruments with embedded levered market and security risks. Slight negative movements in the securities underlying the instrument can adversely affect a Client's portfolio.

Options may be used by Oakmont Capital to implement an investment strategy. However, options are not suitable for all investors. The trading of options is highly speculative and entails risks that are greater than investing in other securities, including negative tax consequences. Prices of options are generally more volatile than prices of other securities. Oakmont Capital can use options to speculate or hedge market fluctuations in the value of securities, futures, and indices. A change in the market price of the underlying asset or index can cause a much greater change in the price of an associated option contract. In addition, to the extent that Oakmont Capital purchases options that it does not sell or exercise, the Client will suffer the loss of the premium paid. To the extent Oakmont Capital sells options and must deliver the underlying securities at the option price, the Client has an unlimited risk of loss if the price of the underlying security increases. To the extent that Oakmont Capital must buy the underlying securities, the Client risks the loss of the difference between the market price of the underlying securities and the option price. Any gain or loss derived from the sale or exercise of an option will be reduced or increased, respectively, by the amount of the premium paid. The expenses of option investing include commissions paid on the purchase, sale, and exercise of the option. Restrictions on the exercise of an option may be imposed by the Options Clearing Corporation, the options market, or a regulatory agency, which can affect the ability of Oakmont Capital to trade options. Oakmont Capital can write options on a "covered" or an "uncovered" basis. If Oakmont Capital sells covered calls, it limits the Client's opportunity to benefit from an increase in the value of the underlying security while continuing to bear the risk of decline in the value of that security. Options are utilized by Oakmont Capital on a speculative or hedging basis.

When Oakmont Capital buys fixed income securities or instruments that reflect the exposure of fixed income securities, the Client is exposed to credit risk. This is the risk that the issuer will fail to meet its financial obligations due to the Client. Fixed income securities with credit ratings below "investment grade" have higher credit risk. This risk is in addition to interest-rate risk in which the price of the fixed income instrument can either rise or fall in conjunction with general market rates.

Securities can be sold "short" by Oakmont Capital as a part of its investing strategy and/or trading activities. In a short sale, Oakmont Capital sells securities the Client does not own in hope that the market price of such security will decline and that Oakmont Capital will be able to subsequently buy replacement securities at a lower price. Oakmont Capital effects a short sale on behalf of the Client by borrowing securities from a broker or other third party, and subsequently "closes" the position by "returning" the security (buying a

replacement security on behalf of the lender) whenever the lender chooses. As collateral for this obligation and to "close" the short position, Oakmont Capital is required to leave the proceeds of the short sale with the broker that effected the transaction and deliver an additional amount of cash or other collateral dictated by margin regulations. Due to the Client's repayment obligation, a short sale theoretically involves the risk of unlimited loss because the price at which Oakmont Capital must buy "replacement" securities could increase without limit. There can be no assurances that the Client will not experience losses on short positions and, if they do, that the losses will be offset by gains on the long positions to which they relate. Short sales can, in some circumstances, substantially increase the impact of adverse price movements on the Client's portfolio.

When appropriate or requested by the Client, Oakmont Capital can utilize various hedging techniques and strategies while managing some Client investment accounts. There is no assurance that these techniques will insulate or protect Clients from losses and/or market declines. Furthermore, the techniques can limit gains of individual securities and the total investment account, as well as have a cost associated with implementing them. These costs include, but are not limited to, additional: transaction fees, security premiums, assignment fees, and taxes.

Unless expressly limited by the Client's IPS, Oakmont Capital may take concentrated positions in individual securities on behalf of the Client. The Client's investment account may be materially and adversely affected if the market value of such securities suddenly drop and do not recover.

When Oakmont Capital believes it is suitable and in the best interests of the Client, it will invest in securities with a share price of less than $5 and/or a market capitalization of less than $150 million. These securities are often referred to as "penny stocks." The trading of such securities is highly speculative and could entail risks that are greater than investing in securities with higher share prices and market capitalizations. These securities are usually thinly traded, and their prices may be materially and adversely affected by a precipitous increase in selling volume. As a result, price changes can occur rapidly, limiting the ability of Oakmont Capital to exit the position.

Oakmont Capital can use ETFs and mutual funds in the investment management process. Due to the unique structure of these securities, they can be bought and sold at, above, or below their net asset value. At any given time, ETFs can be halted from trading and/or an active market may not be maintained to ensure pricing integrity. Similarly, there are times when mutual funds cannot be issued or redeemed at their fair market value. If this occurs, ETF and mutual fund investors can experience a significant loss of capital.

The risks associated with cybersecurity should always be considered by investors. Cybersecurity risks include both intentional and unintentional events within Oakmont Capital or associated service providers that may lead to a financial loss or corruption of data. If this occurs, the ability of the Firm to conduct its business can be severely limited. A cybersecurity breach can also result in a third-party obtaining unauthorized access to Client information, including social security numbers, home addresses, account numbers, and portfolio characteristics. Oakmont Capital has established information security policies, business continuity plans, and risk management systems to help reduce cybersecurity concerns or events. However, there are inherent limitations in these efforts as some risks are currently unknown or new ones can emerge in the future. As a result, there is no guarantee that Oakmont Capital or its associated service providers will deter all cybersecurity threats. Furthermore, there is a risk that a cybersecurity breach may not be detected on a timely basis, if at all.

Artificial Intelligence (AI) refers to the capability of a machine to imitate intelligent human behavior. It is a form of predictive data analytics that draws inferences from large data sets relying on hypothesis-free data mining and inductive reasoning to uncover or suggest future and/or historical outcomes. Techniques

used by AI platforms include, but are not limited to, natural language processing, topic modeling, pattern recognition, machine learning, deep learning, signal processing, neural networking, and other advanced statistical methodologies. The risks with AI arise from data being misinterpreted, incorrectly applied, or miscalculated. Vendors and Oakmont Capital can utilize AI and/or predictive data analytics in their daily operations and are subject to these risks.

Oakmont Capital does not represent, warrant, or imply that the systems, services, or methods of analysis employed by the Firm can or will predict future results, successfully identify market tops or bottoms, or insulate Clients from losses due to market corrections or declines. Investing in securities involves the risk of losing capital and principal, and Clients should be prepared to bear this risk.

Item 9. – Disciplinary Information

There are no legal or disciplinary events that would impact the evaluation by a Client of the investment advisory business or the integrity of the representatives or management of Oakmont Capital.

Item 10. – Other Financial Industry Activities and Affiliations

Oakmont Capital offers general business consulting services to firms, institutions, and individuals. Representatives of Oakmont Capital can perform some of these consulting services during normal security market hours. The time spent by a Firm representative on such services varies, but typically, it does not exceed 40 hours per month. Examples of business consulting include, but are not limited to, strategic planning, operational reviews, capital structure optimization, marketing, and competitor analysis.

Related Person Affiliations

Mr. Marc C. De Fife, who has a non-controlling, passive minority equity interest in Oakmont Capital, is an executive with Hunt Companies, Inc., which has a wholly owned subsidiary Hunt Investment Management, LLC, an SEC-registered investment adviser. Mr. De Fife also serves on the Board of Directors and is a registered representative of Brean Capital, LLC, a registered broker-dealer, member FINRA/SIPC. Oakmont Capital does not execute Client trades or otherwise utilize the services of Hunt Investment Management, LLC or Brean Capital, LLC, on behalf of its Clients. Mr. De Fife does not transact any trades on behalf of Oakmont Capital or its Clients.

Attorney and Accounting Firm Arrangements

As disclosed in Item 4. of this Brochure, Oakmont Capital has negotiated arrangements with certain legal and accounting firms under which Oakmont Capital has agreed to cover the costs of certain professional services provided by these firms to designated Clients. The cost of these services is paid from the advisory fees collected by Oakmont Capital. No Client is obligated to engage these professionals or to receive their covered legal and/or accounting services. The Client can terminate the services provided by the legal and/or accounting firm at any time with written notification to the firm.

Other Conflicts of Interest

Some associated persons of Oakmont Capital and/or their family members hold personal investment accounts at third-party managers or custodians that are also recommended to Clients. To mitigate these potential conflicts of interest and ensure the fulfillment of fiduciary responsibility, all associated persons must act in accordance with all applicable federal and state regulations governing investment advisory practices. Any associated person not in observance may be subject to review, disciplinary action, or

termination by the Chief Compliance Officer.

The Oakmont Capital Management, LLC 401(k) plan is currently administered and managed by a Client. This can potentially represent a conflict of interest. However, this conflict is mitigated by Oakmont Capital using a fiduciary engagement and not receiving a fee discount above and beyond a commonly negotiated one.

A Client of Oakmont Capital is also an employee with sales responsibilities for a mutual fund company utilized by Oakmont Capital. While this could present a conflict of interest, it is mitigated by having the investment decisions associated with the relationship governed by the Oakmont Capital Investment Committee. The Client does not receive a fee discount from Oakmont Capital.

Mr. Jon Koteski is a member of the RJ Lee Group Board of Directors. Oakmont Capital, through the merger with BilkeyKatz, advises on the 401(k) Plan of RJ Lee Group. Any conflict present is mitigated as Mr. Koteski does not have the authority to unilaterally make any financial decisions and all decisions are ratified by the Board of Directors of RJ Lee Group or Plan Trustees as a whole. There is no fee discount associated with the relationship.

Item 11. – Code of Ethics

Code of Ethics

Oakmont Capital has adopted a Code of Ethics, a copy of which is available to Clients and prospective Clients upon written request by contacting Ms. Gina Kovatch, Chief Compliance Officer, at (412) 828-5550. In adopting this Code, the Firm desires to comply with all applicable laws and regulations governing its practice. The management of Oakmont Capital has set forth guidelines for professional standards under which all associated persons of the Firm are to conduct themselves. Oakmont Capital has set high standards, the intention of which is to protect Client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith, and fair dealing with Clients. All associated persons are expected to adhere strictly to these guidelines. The Firm's Code of Ethics requires that certain associated persons submit personal securities transactions and holdings reports to Oakmont Capital, which will be reviewed by the Chief Compliance Officer of Oakmont Capital on periodic basis. Associated persons are also required to report any violations of the Firm's Code of Ethics.

Oakmont Capital maintains and enforces written policies that are reasonably designed to prevent the misuse of material, nonpublic information by Oakmont Capital or any person associated with the Firm.

Participation or Interest in Client Transactions

From time to time, Oakmont Capital or persons associated with Oakmont Capital can buy or sell securities that are recommended to Clients or securities that are currently owned by Clients. It is the policy of the Firm that associated persons of Oakmont Capital shall not have priority over any Client account in the purchase or sale of securities. However, under certain circumstances, exceptions to the trading policy can be made at the discretion of the Chief Compliance Officer.

Persons associated with Oakmont Capital may suggest or recommend service providers to Clients or prospective Clients of the Firm. When this occurs, Oakmont Capital does not expect to earn fees or receive compensation from these service providers.

Privacy Policy

Oakmont Capital views protecting its Clients' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, Oakmont Capital has instituted policies and procedures to ensure that Client information is kept private and secure.

Oakmont Capital does not disclose any nonpublic personal information about its Clients or former Clients to any non-affiliated third parties, except as permitted by law. In the course of servicing a Client's account, Oakmont Capital can share information with service providers, such as custodians, broker-dealers, auditors, and lawyers, in connection with supporting a Client relationship. The Firm restricts internal access to nonpublic personal information about the Client to those employees who need to know that information in order to provide products or services to the Client. As emphasized above, it has always been, and will always be, the Firm's policy to never sell information about current or former Clients or their accounts to anyone. It is also the Firm's policy not to share information unless required to process a transaction, at the request of a Client, or as required by law.

A copy of the Oakmont Capital privacy policy notice will be provided to each Client prior to, or contemporaneously with, the execution of the Agreement.

Item 12. – Brokerage Practices

When selecting, recommending, or engaging a broker-dealer, Oakmont Capital takes into account a full range of factors including trading costs, execution capabilities, transaction speed, trade reliability, financial stability, and integrity. Paying a higher commission rate to one broker over another is permissible if the difference in cost is reasonably justified by the quality of the total brokerage services offered. Oakmont Capital believes that the broker-dealers engaged and/or recommended provide best execution. This is determined through the continual review and monitoring of trade execution quality and data. If desired, Clients can select their own broker-dealer or use multiple broker-dealers for security transactions and custody.

Oakmont Capital does not participate in "soft dollar" arrangements with any broker-dealer, research provider, or product supplier. Furthermore, Oakmont Capital does not receive any Client referrals from any broker-dealer in exchange for recommending or using a particular broker-dealer.

Recommendation of Broker-Dealers and/or Custodians

When managing the Client's portfolio, Oakmont Capital can recommend that Clients use the brokerage and custodial services of Charles Schwab & Co., Inc., a registered broker-dealer, member FINRA/SIPC ("Schwab Institutional").

Schwab Institutional

Schwab Institutional provides Oakmont Capital with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services are generally available to independent investment advisors on an unsolicited basis, at no charge, so long as a total of at least $10 million of Client assets is maintained in accounts at Schwab Institutional. The services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or that would require a significantly higher minimum initial investment. Such services are not contingent upon Oakmont Capital committing to Schwab Institutional any specific amount of business, including assets in custody or trading on an ongoing basis. Even though Schwab Institutional

may list Oakmont Capital as a registered investment advisor via a website or other physical and electronic media, Oakmont Capital does not receive any Client referrals from Schwab Institutional for using its services as a broker-dealer or custodian.

Generally, Schwab Institutional does not have a direct charge for the custody of Client assets. They earn fees and commissions through security transactions and product offerings, including, but not limited to fees embedded in or associated with mutual funds, exchange traded securities, private partnerships, money market funds, fixed income instruments, exchange order flow, and margin lending. Oakmont Capital does not share in any portion of the fees or commissions earned by Schwab Institutional.

Other Broker-Dealers

Besides Schwab Institutional, Oakmont Capital can recommend other broker-dealers to Clients. When this occurs, Oakmont Capital can receive similar services as offered by Schwab Institutional from them. Oakmont Capital periodically and systematically reviews its policies and procedures regarding its recommendation and utilization of broker-dealers in conjunction with its duty to seek best execution.

Directed Brokerage

Some Clients may instruct Oakmont Capital to use one or more brokers for the transactions in their accounts. Clients who instruct Oakmont Capital to use a particular broker should understand that this may prevent the Firm from aggregating trades with other Clients and from effectively negotiating brokerage compensation on their behalf. In some situations, these trades may be placed last behind other similar Client trades. This type of Directed Brokerage may also prevent Oakmont Capital from obtaining the most favorable net price and execution leading to higher costs for the Client and best execution may not be achieved. Thus, when directing brokerage business, Clients should consider whether the commission expenses and execution capabilities are adequately favorable in comparison to those that Oakmont Capital may otherwise obtain for its Clients. Clients are encouraged to discuss available alternatives with Oakmont Capital.

Aggregation of Trade Orders

Generally, but not always, Oakmont Capital can aggregate orders or create a block trade with respect to the same security purchased or sold for different Clients. When orders are aggregated, each participating account receives the average share price for the transaction and bears a proportionate share of all transaction costs, based upon each account's participation in the transaction. Block trades executed for Client accounts can include proprietary or related accounts of Oakmont Capital. Such accounts are treated the same as Client accounts and are neither given preferential nor inferior treatment in terms of timing and price. Allocations of orders among Client accounts are believed to be made in a fair and equitable manner.

Trading Away

When certain conditions exist, Oakmont Capital can execute securities transactions for a Client at a broker-dealer beside the one acting as a custodian for the Client's investment account. This type of transaction is known as "trading away."

Oakmont Capital may pursue such a transaction, because, but not limited to, one of the following reasons:

1) Another broker-dealer may provide greater liquidity when acquiring or disposing of a security.

2) The custodial broker-dealer may not have cost efficient access to securities Oakmont Capital wants to purchase or sale within the Client investment account(s).

If or when Oakmont Capital performs a trade away transaction, the Client may or may not receive a trade confirmation from the custodial broker-dealer or broker-dealer executing the transaction. However, the transaction will be recorded on the monthly and/or quarterly statement sent to the Client by the custodial broker-dealer.

The custodial broker-dealer may charge the Client a fee per trade away transaction performed by Oakmont Capital. This fee is in addition to any brokerage and/or service fees charged by the executing broker, while Oakmont Capital does not receive any portion of such fees.

Item 13. – Review of Accounts

Review of Accounts

An Investment Adviser Representative will monitor each Client account on a continuous basis and will conduct a review of the account at least quarterly. Significant intra-quarter market movements may also trigger a review. During the review, the Representative will examine the Client's account to ensure the integrity of the investment strategy and its adherence to the terms and conditions agreed to in the Investment Management Agreement. For reviewing purposes, Oakmont Capital does not place any restrictions on the number of accounts assigned to each Investment Adviser Representative.

Reports to Clients

Clients will receive custodial statements from a qualified custodian at least quarterly, showing investment values, security transactions, cash balances, and fee withdrawals. Oakmont Capital, at its discretion, or upon request, can also provide Clients a more customized report describing the investment strategy Oakmont Capital is implementing on their behalf. This report can occur on a frequent or infrequent basis and can show such items as asset allocation, types of securities owned, and performance figures. Oakmont Capital can perform less formal reporting via e-mail and phone. Clients should compare their custodial statements to the reports provided by Oakmont Capital for accuracy. Any material discrepancies should be brought to the immediate attention of Oakmont Capital.

Item 14. – Client Referrals and Other Compensation

Client Referrals via a Promoter

Oakmont Capital previously engaged Zoe Financial, Inc., an unaffiliated SEC-registered Investment Advisor ("Zoe Financial") as a promoter to provide client referrals to the Firm. Per an executed agreement with Zoe Financial, Oakmont Capital continues to provide payment to Zoe Financial for historic referrals. However, Zoe Financial is no longer actively promoting for Oakmont Capital, and no clients are currently utilizing the Zoe Wealth Management Platform.

The use of promoters is strictly regulated under applicable federal and state law. The policy of Oakmont Capital is to fully comply with the requirements of Rule 206(4)-1, under the Investment Advisers Act of 1940, as amended, and similar state rules, as applicable.

Other Compensation

From time to time, Oakmont Capital may also receive services, products, and research from broker-dealers.

Examples of such services, products, or research include broker commentary, industry data, security reports, block trading capabilities, news feeds, access to consultants, initial public offerings, and billing functions.

As disclosed under Item 12. of this Brochure, when directly managing the account, Oakmont Capital can recommend that Clients use the brokerage and custodial services of Schwab Institutional.

Schwab Institutional makes available to Oakmont Capital other products and services that benefit Oakmont Capital but may not benefit Client accounts. Some of these other products and services assist Oakmont Capital in managing and administering Client accounts. These products and services include, but are not limited to, software and other technologies that provide access to Client account data (confirmations and account statements); facilitate trade execution (including allocation of aggregated trade orders for multiple Client accounts); provide research, pricing information and other market data; facilitate payment of the Oakmont Capital fees from Client accounts; and assistance with back-office functions, recordkeeping, and Client reporting. Generally, many of these services may be used to service all or a substantial number of the Oakmont Capital Client accounts, including accounts not maintained at Schwab Institutional.

Schwab Institutional also makes available to Oakmont Capital other services intended to help Oakmont Capital manage and further develop its business enterprise. These services can include, but are not limited to, consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to Oakmont Capital by independent third parties. They also have the option to discount or waive fees they would otherwise charge for some of these services or pay all or a part of the fees of a third party providing such services to Oakmont Capital. Oakmont Capital may also receive similar services as offered by Schwab Institutional from other broker-dealers.

As a fiduciary, Oakmont Capital endeavors to act in the best interests of its Clients. However, when Oakmont Capital recommends a broker-dealer or custodian to a Client as referenced above, this recommendation may be partly or entirely based on the benefits Oakmont Capital receives from them, including additional services, software, and products, and not solely on the nature, cost, or quality of custody and brokerage services provided, which has the potential to create a conflict of interest. Oakmont Capital addresses this potential conflict of interest by monitoring the brokerage industry for services being offered while reviewing its policies and procedures regarding its recommendation and utilization of broker-dealers and/or custodians.

Item 15. – Custody

Oakmont Capital does not maintain physical custody of Client cash or securities. Nevertheless, the Firm is deemed to have custody under current SEC rules and interpretations on the following basis:

1) The Firm has the authority to deduct investment advisory fees directly from certain Client accounts;
2) An officer of Oakmont Capital serves as trustee on a Client trust;
3) Oakmont Capital, in certain situations, maintains third-party standing letters of authorization to transfer funds to and from Client accounts.

With regard to investment advisory fees, the qualified custodians in which Client accounts are custodied are required to send statements to Clients no less than quarterly. These statements include market values, holdings, and all account transactions, including any amounts paid to Oakmont Capital for investment advisory fees. As discussed in Item 13. of this Brochure, Oakmont Capital may also send periodic

supplemental reports to Clients. These reports should be reviewed in conjunction with the statements sent by the qualified custodian for the same period to ensure all account market values, holdings, and transactions are correct and current.

When an officer of Oakmont Capital serves as a trustee of a Client trust account (aside from a family account), Oakmont Capital will engage an independent public accountant to conduct an unannounced annual inspection of the trust account pursuant to a written agreement in which Oakmont Capital is deemed to have custody. The surprise inspection will review the market values, holdings, and transactions of the trust, including any amounts paid to Oakmont Capital for investment advisory fees.

Additionally, certain Clients have signed, and in the future could sign, a standing letter of authorization (SLOA) that gives Oakmont Capital the authority to transfer funds to and from a third-party as directed by the Client in the SLOA. This is deemed to give the Firm custody. In the case of SLOAs, Oakmont Capital intends to comply with the SEC No-Action Letter dated February 21, 2017, allowing firms who comply with all provisions of the no-action letter to forego the annual surprise custody examination with respect to those assets. These provisions include that Oakmont Capital must: (i) confirm that the name and address of the third party is included in the SLOA, (ii) document that the third party receiving the transfer is not related to the Firm, and (iii) ensure that certain requirements are being performed by the qualified custodian.

Item 16. – Investment Discretion

Oakmont Capital can receive discretionary and/or non-discretionary authority to identify the purchase and sale of securities in an investment account by entering into an Investment Management Agreement with a Client. When exercising discretionary authority, it is implemented in a manner consistent with the risk/return objectives of the Client.

If an IPS is accepted by both the Client and Oakmont Capital, this document will be used to make investment decisions in conjunction with the restrictions and limitations stated within it. If an IPS does not exist between the parties, any investment restrictions or limitations must be provided to Oakmont Capital in writing by the Client.

Item 17. – Voting Client Securities

Proxy Voting

Oakmont Capital will not be required to take any action or render any advice with respect to voting of proxies solicited by, or with respect to, the issuers of securities in which individual assets of the Client are invested. All proxy related materials received directly by Oakmont Capital will be forwarded to the Client for direct action. In some cases, if authorized by the Client, Oakmont Capital will receive informational copies of the same materials and is not required to forward them to the Client.

Class Action Lawsuits

From time to time, securities held in the accounts of individual Clients will be the subject of class action lawsuits. Oakmont Capital has no obligation to determine if securities held by the Client are subject to a pending or resolved class action lawsuit. Oakmont Capital also has no duty to evaluate the eligibility of the Client to submit a claim or to participate in the proceeds of a securities class action settlement. Furthermore, Oakmont Capital has no obligation or responsibility to initiate litigation to recover damages on behalf of a Client who may have been injured because of the actions, misconduct, or negligence of a security issuer or its corporate management.

When Oakmont Capital receives written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by a Client, it will forward all notices, proof of claim forms, and other materials, to the Client. Electronic mail is acceptable where appropriate, and the Client has authorized contact in this manner. When Oakmont Capital receives informational copies of the same materials, it is not required to forward them to the Client.

Item 18. – Financial Information

Registered investment advisers are required in this Item to provide the Client with certain financial information or disclosures about their financial condition. Oakmont Capital has no financial condition that is reasonably likely to impair its ability to meet contractual commitments to its Clients. Furthermore, under no circumstances does Oakmont Capital solicit or require the payment of unearned advisory fees of $1,200 or more six months or more in advance of services rendered.



Part 2B of Form ADV: Brochure Supplement

Oakmont Capital Management, LLC
also doing business as
BilkeyKatz Investment Consultants

Principal Office:
Oakmont Capital Management, LLC
856 Allegheny River Blvd.
Oakmont, PA 15139
(412) 828-5550
(844) 376-4244

Branch Office:
411 Seventh Avenue, Suite 1425
Pittsburgh, PA 15219
(412) 803-9900

www.oakmontcap.com
www.bilkeykatz.com

September 11, 2026

This brochure supplement provides information about Lawrence Jon Koteski, Darrin K. Duda, Patrick W. Fisher, Jerry E. Katz, Michael T. Komaniak, Gina M. Kovatch, Michael G. Ladakos, Kyle R. Rioboli and T. Scott Thompson, that supplements the Oakmont Capital Management, LLC brochure. You should have received a copy of that brochure. Please contact Mr. Lawrence "Jon" Koteski, Managing Partner, if you did not receive Oakmont Capital Management, LLC's brochure or if you have any questions about the contents of this supplement.

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

Item 2: Educational Background and Business Experience

Year of Birth: 1969

Education:

1991 A.B., Economics, Harvard University
1999 Master of Business Administration, Finance, Boston University

Professional Designations:

1996 Chartered Financial Analyst (CFA®)
2008 Chartered Alternative Investment Analyst (CAIA®)
2014 Accredited Investment Fiduciary® (AIF®)

Mr. Duda earned the right to use the Chartered Financial Analyst® designation in 1985. The CFA® designation is a globally-recognized professional certification offered by the CFA Institute. To become a CFA charterholder, individuals must possess a bachelor's degree (or equivalent as assessed by the CFA Institute), will have completed an average of 1,000+ hours of rigorous study, along with four (4) years of qualified, professional work experience and successful completion of the CFA Program exam. Earning the CFA designation is a highly selective process which requires candidates to pass three (3) levels of exams covering areas such as accounting, economics, ethics, money management, and security analysis. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct, which they must attest to, on an annual basis. More information about the CFA designation is available at www.cfainstitute.org.

Mr. Duda earned the Chartered Alternative Investment Analyst (CAIA®) designation in 2008. The CAIA designation, recognized globally, is administered by the Chartered Alternative Investment Analyst Association and requires a comprehensive understanding of core and advanced concepts regarding alternative investment structures (hedge funds, real estate, managed futures, commodities, private equity, distressed debt, credit derivatives, etc.) and ethical obligations. To qualify for the CAIA designation, 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 proctored examinations; attest annually to the terms of the Member Agreement; and hold a US bachelor's degree (or equivalent as assessed by the CAIA Association) plus have at least one year of professional experience. Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related industries. More information about the CAIA designation is available at www.caia.org.

Mr. Duda earned the right to use the AIF® designation from the Center for Fiduciary Studies in 2014. The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a proctored exam, and agree to abide by the AIF Code of Ethics. To maintain the AIF designation, the individual must annually renew an affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 company). More information about the AIF designation is available at www.fi360.com.

Business Background:

2025-Present Partner, Chief Investment Officer, Oakmont Capital Management, LLC
2007 - 2025 Principal and Senior Consultant, BilkeyKatz Investment Consultants, Inc.
2003 - 2007 Manager, Investor Relations & Trust Investments, Duquesne Light Company
2002 - 2003 Independent Contractor-Consultant, Gateway Health Plan, L.P.
1999 - 2002 Senior Consultant, Yanni Partners
1992 - 1999 Vice President, Portfolio Construction & Optimization, Acadian Asset Management

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Duda. Mr. Duda has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Duda.

Item 4: Other Business Activities

Mr. Duda is serving as an interim faculty advisor at Indiana University of Pennsylvania for the 2025-2026 academic year. He will be providing advisory services to the Student Managed Investment Portfolio (SMIP) Team at the IUP Eberly College of Business.

Item 5: Additional Compensation

Mr. Duda does not receive any additional compensation from third-parties for providing investment advisory services associated with his duties at Oakmont Capital Management, LLC.

Item 6: Supervision

In conjunction with the Chief Compliance Officer, Lawrence "Jon" Koteski, as Managing Partner of Oakmont Capital Management, LLC is responsible for all employee supervision, including Darrin K. Duda and other firm employees.

Item 2: Educational Background and Business Experience

Year of Birth: 1967

Education:

1991 B.S.B.A., Accounting, B.A. English, West Virginia University
2000 Master of Business Administration, Finance, Duquesne University

Professional Designations:

2003 Chartered Financial Analyst (CFA®)
2015 Chartered Alternative Investment Analyst (CAIA®)

Mr. Fisher earned the right to use the Chartered Financial Analyst® designation in 1985. The CFA® designation is a globally-recognized professional certification offered by the CFA Institute. To become a CFA charterholder, individuals must possess a bachelor's degree (or equivalent as assessed by the CFA Institute), will have completed an average of 1,000+ hours of rigorous study, along with four (4) years of qualified, professional work experience and successful completion of the CFA Program exam. Earning the CFA designation is a highly selective process which requires candidates to pass three (3) levels of exams covering areas such as accounting, economics, ethics, money management, and security analysis. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct, which they must attest to, on an annual basis. More information about the CFA designation is available at www.cfainstitute.org.

Mr. Fisher earned the Chartered Alternative Investment Analyst (CAIA®) designation in 2008. The CAIA designation, recognized globally, is administered by the Chartered Alternative Investment Analyst Association and requires a comprehensive understanding of core and advanced concepts regarding alternative investment structures (hedge funds, real estate, managed futures, commodities, private equity, distressed debt, credit derivatives, etc.) and ethical obligations. To qualify for the CAIA designation, 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 proctored examinations; attest annually to the terms of the Member Agreement; and hold a US bachelor's degree (or equivalent as assessed by the CAIA Association) plus have at least one year of professional experience. Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related industries. More information about the CAIA designation is available at www.caia.org.

Business Background:

2025-Present Partner, Head of Consulting Services, Oakmont Capital Management, LLC
2012 - 2025 Principal and Senior Consultant, BilkeyKatz Investment Consultants, Inc.
2008 - 2012 Investment Relationship Manager, Schneider Downs Wealth Management Advisors, LP
2000 - 2008 Senior Consultant, Yanni Partners
1998 - 2000 Assistant Accounting Manager, Horix Manufacturing
1992 - 1998 Cash Manager, Mellon Bank Corporation

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Fisher. Mr. Fisher has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Fisher.

Item 4: Other Business Activities

Mr. Fisher became a member of the Investment Committee for the YWCA Greater Pittsburgh in May of 2018. In January 2025, Mr. Fisher became a Board member of the CCAC Educational Foundation.

Item 5: Additional Compensation

Mr. Fisher does not receive any additional compensation from third-parties for providing investment advisory services associated with his duties at Oakmont Capital Management, LLC.

Item 6: Supervision

In conjunction with the Chief Compliance Officer, Lawrence "Jon" Koteski, as Managing Partner of Oakmont Capital Management, LLC is responsible for all employee supervision, including Patrick W. Fisher and other firm employees.

NATHAN D. GRAHAM

Item 2: Educational Background and Business Experience

Year of Birth: 2002

Education:

2025 Bachelor of Arts, Economics, The Pennsylvania State University

Business Background:

2025 – Present Analyst, Oakmont Capital Management, LLC

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Graham. Mr. Graham has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Graham.

Item 4: Other Business Activities

Mr. Graham became the Assistant Coach of the Fox Chapel School District Girl's Golf Team in August of 2026.

Item 5: Additional Compensation

Mr. Graham receives an economic benefit for his service to the Fox Chapel School District.

Item 6: Supervision

In conjunction with the Chief Compliance Officer, Lawrence "Jon" Koteski, as Managing Partner of Oakmont Capital Management, LLC is responsible for all employee supervision, including Nathan D. Graham and other firm employees.

JERRY E. KATZ

Item 2: Educational Background and Business Experience

Year of Birth: 1958

Education:

1978	Temple University
1980	Undergraduate Degree, University of Southern California
1984	Master of Business Administration, New York University, Stern School of Business

Professional Designations:

1988	Chartered Financial Analyst (CFA®)

Mr. Katz earned the right to use the Chartered Financial Analyst® designation in 1985. The CFA® designation is a globally-recognized professional certification offered by the CFA Institute. To become a CFA charterholder, individuals must possess a bachelor's degree (or equivalent as assessed by the CFA Institute), will have completed an average of 1,000+ hours of rigorous study, along with four (4) years of qualified, professional work experience and successful completion of the CFA Program exam. Earning the CFA designation is a highly selective process which requires candidates to pass three (3) levels of exams covering areas such as accounting, economics, ethics, money management, and security analysis. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct, which they must attest to, on an annual basis. More information about the CFA designation is available at www.cfainstitute.org.

Business Background:

2025 - Present	Senior Advisor, Oakmont Capital Management, LLC
2002 - 2025	Co-Founder and Senior Consultant, BilkeyKatz Investment Consultants, Inc.
1999 - 2002	General Manager, Trust Investments & Risk Manager, DQE Inc.
1984 - 1999	Senior Consultant, Yanni•Bilkey Investment Consulting

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Katz. Mr. Katz has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Katz.

Item 4: Other Business Activities

Jerry E. Katz serves as a member of the Finance and Investment Committee for The Advanced Leadership Institute, as a member of the Investment Committee for the Hebrew Loan Association of Pittsburgh, and as Treasurer of Bakery Village HOA.

Item 5: Additional Compensation

Mr. Katz does not receive any additional compensation from third-parties for providing investment advisory services associated with his duties at Oakmont Capital Management, LLC.

Item 6: Supervision

In conjunction with the Chief Compliance Officer, Lawrence "Jon" Koteski, as Managing Partner of Oakmont Capital Management, LLC is responsible for all employee supervision, including Jerry E. Katz and other firm employees.

MICHAEL T. KOMANIAK

Item 2: Educational Background and Business Experience

Year of Birth: 1999

Education:

2022	Bachelor of Arts, Economics, Washington & Jefferson College
2025	Master of Science, Analytics & Information Management, Duquesne University

Business Background:

2025 - Present	Senior Analyst & Trader, Oakmont Capital Management, LLC
2022 - 2025	Analyst, Oakmont Capital Management, LLC
2022	Financial Specialist, ABARTA Coca-Cola

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Komaniak. Mr. Komaniak has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Komaniak.

Item 4: Other Business Activities

Mr. Komaniak is not actively engaged in any other investment-related business or activities other than those provided by Oakmont Capital Management, LLC.

Item 5: Additional Compensation

Mr. Komaniak does not receive any additional compensation from third-parties for providing investment advisory services associated with his duties at Oakmont Capital Management, LLC.

Item 6: Supervision

In conjunction with the Chief Compliance Officer, Lawrence "Jon" Koteski, as Managing Partner of Oakmont Capital Management, LLC is responsible for all employee supervision, including Michael T. Komaniak and other firm employees.

Item 2: Educational Background and Business Experience

Year of Birth: 1973

Education:

1996 Bachelor of Arts in Economics, Franklin & Marshall College
1999 Master of Business Administration, University of Pittsburgh, Joseph Katz School of Business

Professional Designations:

2005 Chartered Financial Analyst (CFA®)
2010 Accredited Investment Fiduciary® (AIF®)
2011 Chartered Alternative Investment Analyst (CAIA®)

Mr. Koteski earned the right to use the Chartered Financial Analyst® designation in 1985. The CFA® designation is a globally-recognized professional certification offered by the CFA Institute. To become a CFA charterholder, individuals must possess a bachelor's degree (or equivalent as assessed by the CFA Institute), will have completed an average of 1,000+ hours of rigorous study, along with four (4) years of qualified, professional work experience and successful completion of the CFA Program exam. Earning the CFA designation is a highly selective process which requires candidates to pass three (3) levels of exams covering areas such as accounting, economics, ethics, money management, and security analysis. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct, which they must attest to, on an annual basis. More information about the CFA designation is available at www.cfainstitute.org.

Mr. Koteski earned the right to use the AIF® designation from the Center for Fiduciary Studies in 2014. The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a proctored exam, and agree to abide by the AIF Code of Ethics. To maintain the AIF designation, the individual must annually renew an affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 company). More information about the AIF designation is available at www.fi360.com.

Mr. Koteski earned the Chartered Alternative Investment Analyst (CAIA®) designation in 2008. The CAIA designation, recognized globally, is administered by the Chartered Alternative Investment Analyst Association and requires a comprehensive understanding of core and advanced concepts regarding alternative investment structures (hedge funds, real estate, managed futures, commodities, private equity, distressed debt, credit derivatives, etc.) and ethical obligations. To qualify for the CAIA designation, 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 proctored examinations; attest annually to the terms of the Member Agreement; and hold a US bachelor's degree (or equivalent as assessed by the CAIA Association) plus have at least one year of professional experience. Professional experience includes full-time employment in a professional capacity within the regulatory, banking, financial, or related industries. More information about the CAIA designation is available at www.caia.org.

Business Background:

2002 - Present Founder and Managing Partner, Oakmont Capital Management, LLC
2024 - Present Trustee, The Buhl Foundation
2019 - Present Board Member, Blue Nano Technologies, LLC
2008 - Present Board Member, RJ Lee Group
1999 - 2002 Associate Consultant/Consulting Analyst, Yanni Partners
1997 - 1999 Cash Manager, Global Securities Mellon Bank

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Koteski. Mr. Koteski has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Koteski.

Item 4: Other Business Activities

Mr. Koteski is on the Board of Director's for RJ Lee Group and Blue Nano Technologies, LLC. He also serves on the Board of Director's for The Buhl Foundation, as well as serving as the Fox Chapel School District Girl's Varsity Golf Coach.

Item 5: Additional Compensation

Mr. Koteski receives an economic benefit for his service to The Buhl Foundation and Fox Chapel School District.

Item 6: Supervision

As Managing Partner, Mr. Koteski does not have a direct supervisor, however, like all employees of Oakmont Capital Management, LLC, he is subject to the policies and procedures governing client advisory activities, operations, and general business strategy as overseen by the Chief Compliance Officer, Gina M. Kovatch.

GINA M. KOVATCH

Item 2: Educational Background and Business Experience

Year of Birth: 1972

Education:

1994 Bachelor of Arts, Communication & Information Arts, Saint Vincent College

Professional Designations:

1999 Chartered Retirement Plans Specialist (CRPS®)

In 1999, Ms. Kovatch earned the right to use the Chartered Retirement Plan Specialist (CRPS®) designation. Individuals who hold the CRPS® designation have completed a course of study encompassing design, installation, maintenance and administration of retirement plans. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements. More information is available about the CRPS® designation at https://www.cffp.edu.

Business Background:

2016 - Present	Chief Compliance Officer, Senior Advisor, Oakmont Capital Management, LLC
2002 - 2016	Registered Representative, Trustmont Financial Group, Inc
2000 - 2016	Partner, J.E. Harris & Associates, LLC
1997 - 2000	Trust Officer Associate, Commercial Bank & Trust of PA

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Kovatch. Ms. Kovatch has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Kovatch.

Item 4: Other Business Activities

Ms. Kovatch is not actively engaged in any other investment-related business or activities other than those provided by Oakmont Capital Management, LLC.

Item 5: Additional Compensation

Ms. Kovatch does not receive any additional compensation from third-parties for providing investment advisory services associated with her duties at Oakmont Capital Management, LLC.

Item 6: Supervision

Like all employees of Oakmont Capital Management, LLC, Ms. Kovatch is subject to the policies and procedures governing client advisory activities, operations, and general business strategy, supervised by Mr. Koteski. Mr. Koteski also oversees Ms. Kovatch's compliance activities.

MICHAEL G. LADAKOS

Item 2: Educational Background and Business Experience

Year of Birth: 1961

Education:

1983 Bachelor of Science in Finance, Indiana University of Pennsylvania

Military Experience:

1981 - 1991 United States Army Reserve, Executive Officer, Psychological

Professional Designations:

2015 Accredited Investment Fiduciary® (AIF®)

Mr. Ladakos earned the right to use the AIF® designation from the Center for Fiduciary Studies in 2014. The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a proctored exam, and agree to abide by the AIF Code of Ethics. To maintain the AIF designation, the individual must annually renew an affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 company). More information about the AIF designation is available at www.fi360.com.

Business Background:

2010 - Present	Director of Research, Oakmont Capital Management, LLC
2009 - 2011	Principal, Ladakos Investment Management and Research
2006 - 2009	Consultant, contractor for multiple financial services companies
2004 - 2005	Consultant, Raulin Inc. (Investment Consulting)
2003 - 2004	Consultant, contractor for multiple financial services companies
1997 - 2003	Consultant, Yanni Partners

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Ladakos. Mr. Ladakos has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Ladakos.

Item 4: Other Business Activities

Mr. Ladakos is not actively engaged in any other investment-related business or activities other than those provided by Oakmont Capital Management, LLC.

Item 5: Additional Compensation

Mr. Ladakos does not receive any additional compensation from third-parties for providing investment advisory services associated with his duties at Oakmont Capital Management, LLC.

Item 6: Supervision

In conjunction with the Chief Compliance Officer, Lawrence "Jon" Koteski, as Managing Partner of Oakmont Capital Management, LLC is responsible for all employee supervision, including Michael G. Ladakos and other firm employees.

KYLE R. RIOBOLI

Item 2: Educational Background and Business Experience

Year of Birth: 1992

Education:

2015 Bachelor of Science in Finance, University of Pittsburgh
2015 Bachelor of Science in Business Information Systems, University of Pittsburgh

Professional Designations:

2019 Chartered Financial Analyst (CFA®)
2024 Accredited Investment Fiduciary® (AIF®)
2025 Certified Financial Planner (CFP®)

Mr. Rioboli earned the right to use the Chartered Financial Analyst® designation in 1985. The CFA® designation is a globally-recognized professional certification offered by the CFA Institute. To become a CFA charterholder, individuals must possess a bachelor's degree (or equivalent as assessed by the CFA Institute), will have completed an average of 1,000+ hours of rigorous study, along with four (4) years of qualified, professional work experience and successful completion of the CFA Program exam. Earning the CFA designation is a highly selective process which requires candidates to pass three (3) levels of exams covering areas such as accounting, economics, ethics, money management, and security analysis. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct, which they must attest to, on an annual basis. More information about the CFA designation is available at www.cfainstitute.org.

Mr. Rioboli earned the right to use the AIF® designation from the Center for Fiduciary Studies in 2014. The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a proctored exam, and agree to abide by the AIF Code of Ethics. To maintain the AIF designation, the individual must annually renew an affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 company). More information about the AIF designation is available at www.fi360.com.

Mr. Rioboli is a CERTIFIED FINANCIAL PLANNER® which he earned in 2025. The CERTIFIED FINANCIAL PLANNER®, CFP® and federally registered CFP (collectively, the "CFP® marks") are voluntary professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® professional is an individual who has met the standard of excellence in financial planning set out by the Certified Financial Planner Board of Standards. Along with a bachelor's degree or higher, individuals will have completed CFP Board approved coursework at a college or university through a CFP Board Registered Program, 6,000 hours of professional experience related to the personal financial planning process, and successful completion of a comprehensive exam administered by the CFP Board. A CFP® professional assists individuals with a wide range of financial planning needs, using a holistic approach, creating plans for investments, retirement, insurance, education financing, managing taxes, and estate planning.

The certification signifies a high level of commitment to competence, ethics, and professionalism in the field of financial planning. CFP® professionals must also adhere to a strict code of ethics and standards of conduct set by the CFP Board. To remain certified, Mr. Rioboli must complete 30 hours of ongoing education every two (2) years and ethics requirements reflecting a commitment to complying with the CFP Board's Code and Standards.

Business Background:

2021- Present	Director of Trading and Investments, Oakmont Capital Management, LLC
2018 - 2021	Financial Underwriter, Coventry First, LLC
2017 - 2018	Analyst, CMBS, Kroll Bond Rating Agency
2015 - 2017	Financial Analyst, Coventry First, LLC

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Rioboli. Mr. Rioboli has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Rioboli.

Item 4: Other Business Activities

Mr. Rioboli is not actively engaged in any other investment-related business or activities other than those provided by Oakmont Capital Management, LLC.

Item 5: Additional Compensation

Mr. Rioboli does not receive any additional compensation from third-parties for providing investment advisory services associated with his duties at Oakmont Capital Management, LLC.

Item 6: Supervision

In conjunction with the Chief Compliance Officer, Lawrence "Jon" Koteski, as Managing Partner of Oakmont Capital Management, LLC is responsible for all employee supervision, including Kyle R. Rioboli and other firm employees.

T. SCOTT THOMPSON

Item 2: Educational Background and Business Experience

Year of Birth: 1956

Education:

1978 Bachelor of Science in Finance, Bethany College

Business Background:

2009 - Present	Senior Investment Advisor, Oakmont Capital Management, LLC
2005 - 2009	Investment Advisor Representative, Networth Investment Advisors, Inc.
1993 - 2009	Investment Advisor Representative, Financial Decision Resources

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Thompson. Mr. Thompson has never been involved in any regulatory, civil or criminal action. There have been no complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Thompson.

Item 4: Other Business Activities

T. Scott Thompson is a Board Member of the Psi Diamond Charitable Fund, a College Fraternity Scholarship Fund at Bethany College.

Item 5: Additional Compensation

Mr. Thompson does not receive any additional compensation from third-parties for providing investment advisory services associated with his duties at Oakmont Capital Management, LLC.

Item 6: Supervision

In conjunction with the Chief Compliance Officer, Lawrence "Jon" Koteski, as Managing Partner of Oakmont Capital Management, LLC is responsible for all employee supervision, including T. Scott Thompson and other firm employees.