



# UNION STRATEGIC ADVISORS

**UNION STRATEGIC ADVISORS LLC**

**FORM ADV PART 2A**

**BROCHURE**

**Item 1 – Cover Page**

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This brochure provides information about the qualifications and business practices of Union Strategic Advisors LLC. If you have any questions regarding the contents of this brochure, please do not hesitate to contact our Chief Compliance Officer, Kevin Kim by telephone at 513-977-8615 or by email at [kevin.kim@dinsmorecomplianceservices.com](mailto:kevin.kim@dinsmorecomplianceservices.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Union Strategic Advisors is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training. Additional information about Union Strategic Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

April 1, 2026

## **Item 2 – Material Changes**

Form ADV Part 2A requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure since the last annual update of the disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Union Strategic Advisors is a newly registered investment adviser and this brochure was initially filed as part of that registration. Accordingly, there are no material changes to report.

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## Item 4 - Advisory Business

### A. Description of the Advisory Firm

Union Strategic Advisors LLC (“USA” or the “Firm”) is a corporation organized in the State of Ohio. USA is an investment advisory firm registered with the United States Securities and Exchange Commission (“SEC”). USA is owned by Timothy Recker and Alex Holtmeier.

### B. Types of Advisory Services

USA provides discretionary and non-discretionary investment management services to individuals, high net worth individuals, high net worth families, trusts, estates, business entities, qualified retirement plans and donor advised funds. Generally, financial planning services are also provided to USA Wrap Fee Program clients. USA also provides business consulting services to small and medium size businesses and business owners.

#### Investment Management and Financial Planning Services

USA offers investment management services on a discretionary basis and non-discretionary basis. All investment advice provided is customized to each client’s investment objectives and financial needs. The information provided by the client, together with any other information relating to the client’s overall financial circumstances, will be used by USA to determine the appropriate portfolio asset allocation and investment strategy for the client. USA provides investment management services to clients through a wrap fee program (the “USA Wrap Fee Program”). See USA’s Form ADV Part 2A, Appendix 1 for additional information regarding the USA Wrap Fee Program.

The securities utilized by USA in the USA Wrap Fee Program client accounts consist of registered mutual funds, exchange traded funds (ETFs), equity securities, options on equity securities, corporate bonds, state and local municipality fixed income instruments (“municipal securities”), US government and agency securities, fixed annuities and private funds/alternative investments, if we determine such investments fit within a client’s objectives and are in the best interest of our clients.

USA may further recommend to clients that all or a portion of their USA Wrap Fee Program investment portfolio be managed on a discretionary basis by one or more unaffiliated money managers or investment platforms (“External Managers”). The client may be required to enter into a separate agreement with the External Manager(s), which will set forth the terms and conditions of the client’s engagement of the External Manager. USA generally renders services to the client relative to the discretionary selection of External Managers. USA also assists in establishing the client’s investment objectives for the assets managed by External Managers, monitors and reviews the account performance and defines any restrictions on the account. The investment management fees charged by the designated External Managers are exclusive of, and in addition to, the annual investment management services fee charged by USA. For External Managers made available through the B/D Custodian RJA, custody and securities transactions commissions are included within the USA Wrap Fee Program fee. If an External Manager is utilized that engages in brokerage transactions and/or custody services with a broker-dealer/custodian other than RJA, the fees charged by that broker-dealer/custodian will be exclusive of, and in addition to, the annual USA Wrap Program fee.

Generally, financial planning services are also provided to USA Wrap Fee Program clients. Provided financial planning services work to set forth goals, objectives and implementation strategies for the client over the long-term. Depending upon individual client requirements, provided recommendations may address retirement planning, educational planning, estate planning, cash flow planning, tax planning and insurance needs and analysis. When providing financial planning services to USA Wrap Fee Program Clients, USA continues to review any provided recommendations as part of the ongoing provision of investment management services. Clients should notify us promptly anytime there is a change in their financial situation, goals, objectives, or needs and/or if there is any change to the financial information initially provided to us.

USA cannot provide any guarantees or promises that a client's financial goals and objectives will be met.

#### Investment Management Services to Retirement Plans

USA offers discretionary and non-discretionary advisory services to qualified plans, including 401k plans. These services include, depending upon the needs of the plan client, recommending, or for discretionary clients selecting, investment options for plans to offer to participants, ongoing monitoring of a plan's investment options, assisting plan fiduciaries in creating and/or updating the plan's written investment policy statements, working with plan service providers, and providing general investment education to plan participants.

#### Business Consulting Services

USA offers consulting services to small and medium size businesses and business owners. Depending upon the needs of the business and the business owner, consulting services may include information and recommendations regarding growth strategies, business entity value enhancement, exit and sale strategies, next generation transition strategies and tax considerations.

**Note for IRA and Retirement Plan Clients:** When USA provides investment advice to you regarding your retirement plan account or individual retirement account, USA is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way USA makes money creates some conflicts with your interests, so USA operates under a special rule that requires USA to act in your best interest and not put USA's interest ahead of yours.

**Note Regarding Tax or Legal Advice:** In providing services, USA does not offer or otherwise provide tax or legal advice. USA will, at a client's direction and approval, work with a client's existing tax or legal professionals to assist in the provision of the services. Fees charged by any tax, legal or other third-party professionals are the responsibility of the client. USA may refer professionals; however, there is no compensation to USA for these referrals, and clients are under no obligation to use the referred service providers. Within its discretion, USA may determine to reimburse a client for, or otherwise pay, the tax return preparation fee charged by the tax professional engaged by the client.

### **C. Client-Tailored Advisory Services**

Clients may impose reasonable restrictions on the management of their accounts if USA determines, in its sole discretion, that the conditions would not materially impact the performance of a management strategy or prove overly burdensome for USA's management efforts.

### **D. Information Received From Clients**

USA will not assume any responsibility for the accuracy or the information provided by clients. USA is not obligated to verify any information received from a client or other professionals (e.g., attorney, accountant) designated by a client, and USA is expressly authorized by the client to rely on such information provided. Under all circumstances, clients are responsible for promptly notifying USA in writing of any material changes to the client's financial situation, investment objectives, time horizon, or risk tolerance.

### **E. Assets Under Management**

USA is a newly registered adviser. Therefore, as of the date of filing this Brochure, USA did not have assets under management.

## **Item 5 - Fees and Compensation**

USA charges fees based on a percentage of assets under management. As noted above in Item 4, in providing financial planning services to USA Wrap Fee Program Clients, USA does not charge an additional fee. The specific fees charged by USA for services provided will be set forth in each client's agreement.

### **A. Investment Management and Business Consulting Services**

#### Fees for Investment Management Services

In providing investment management services pursuant to the USA Wrap Fee Program, USA charges an annual investment management services fee that is agreed upon with each client and set forth in an agreement executed by USA and the client. The USA Wrap Fee Program investment management services fee is based on a percentage of the value of assets under management and is generally paid quarterly in advance. When a client's account is opened, the USA Wrap Fee Program investment management services fee is billed for the remainder of the current quarterly billing period and is based on the client's initial contribution to the client account. Subsequent quarterly USA Wrap Fee Program investment management services fees will be based on the client's account value as of the last business day of the previous calendar quarter. If cash or securities, or a combination thereof, amounting to at least \$100,000 are deposited to or withdrawn from a USA Wrap Fee Program client's account on an individual business day in the first two months of the quarter, USA will (i) assess investment management services fees to the deposited assets based on the value of the assets on the date of deposit for the pro rata number of days remaining in the quarter, or (ii) refund prepaid USA Wrap Fee Program investment management services fees based on the value of the assets on the date of withdrawal for the pro rata number of days remaining in the quarter. No additional USA Wrap Fee Program investment management services fees or adjustments to previously assessed USA Wrap Fee Program investment management services fees will be made in connection with deposits or withdrawals that occur during the last month of the quarter.

For purposes of USA Wrap Fee Program investment management services fee calculation, USA utilizes third party sources, such as pricing services, custodians, fund administrators, and client-provided sources. For purposes of fee calculation, the asset value of USA Wrap Fee Program client accounts include cash and cash equivalents, as well as margined securities. USA does not reduce USA Wrap Fee Program investment management fees for margin borrowing, regardless of whether the assets are in cash or other securities. USA has a financial incentive to recommend that clients borrow money for the purchase of additional securities for the client's USA Wrap Fee Program account managed by USA or otherwise not liquidate some or all the assets USA manages. USA addresses this conflict of interest through this disclosure and working to ensure that any recommendation to a client regarding the use of margin is suitable for the client.

The annual USA Wrap Fee Program investment management services fee ranges up to 1.00%.

#### Fees for Business Consulting Services

Clients that are receiving business consulting services are charged a fixed fee ranging up to \$250,000 or an hourly fee ranging up to \$800 an hour depending upon the complexity of services provided. USA's business consulting services fee is charged quarterly or otherwise upon completion of the engagement. Actual business consulting services fees charged are clearly outlined in the business consulting services agreement and clients receive invoices reflecting the amount of the fee due and payable.

Notwithstanding the foregoing, USA and the client may choose to negotiate an annual investment management or business consulting services fee that varies from the ranges set forth above. Factors upon which a different annual investment management or business consulting services fee may be based include as applicable, but are not limited to, the size and nature of the relationship, the services rendered, the nature and complexity of the products and investments involved, time commitments, and travel requirements. The investment management services fee charged by the Firm will apply to all of the client's assets under management, unless specifically excluded in the client agreement. Although USA believes that its fees are competitive, clients should understand that lower fees for comparable services may be available from other sources and firms.

The investment management or business consulting services agreement between USA and the client may be terminated at will by either USA or the client upon written notice. USA does not impose termination fees when the client terminates the investment advisory or business consulting relationship, except when agreed upon in advance.

#### **B. Payment of Fees**

USA generally deducts its investment management services fee from a client's investment account(s) held at the custodian. Upon engaging USA to manage such account(s), a client grants USA this limited authority through a written instruction to the custodian of his/her account(s). The client is responsible for verifying the accuracy of the calculation of the investment management services fee; the custodian will not determine whether the fee is accurate or properly calculated. A client may utilize the same procedure for business consulting services fees if the client has investment accounts held at a custodian.

Although clients generally are required to have their investment management services fees deducted from their accounts, in some cases, USA will directly bill a client for investment management services fees if it

determines that such billing arrangement is appropriate given the circumstances. Generally, USA will directly bill business consulting services clients.

The custodian of the client's accounts provides each investment management services client with a statement, at least quarterly, indicating separate line items for all amounts disbursed from the client's account(s), including any fees paid directly to USA.

Clients may make additions to, and withdrawals from, their account at any time, subject to USA's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets at any time on notice to USA, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. USA may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g. contingent deferred sales charges) and/or tax ramifications.

#### **C. Clients Responsible for Fees Charged by Financial Institutions and External Money Managers**

The USA Wrap Fee Program fee covers USA's advisory services, custody and commissions for securities transactions effected through RJA. The number of transactions made in clients' accounts, the size of the accounts, and the securities used to construct a portfolio, as well as the commissions charged for each transaction, determines the relative cost of the USA Wrap Fee Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Participants in the USA Wrap Fee Program may pay a higher or lower aggregate fee than if the investment management and brokerage services are purchased separately. USA does not charge its clients higher advisory fees based on their trading activity, but clients should be aware that USA may have an incentive to limit its trading activities in USA Wrap Fee Program client accounts because USA is charged for executed trades. USA addresses this conflict of interest through this disclosure and through its policies and procedures which work to ensure that USA Wrap Fee Program accounts are managed in accordance with clients' goals and objectives without consideration of trading costs incurred by USA. Transaction fees or "trade away" fees imposed for trades placed away from RJA, are not covered by the USA Wrap Program Fee. Refer to USA's Form ADV Part 2A, Appendix 1 for additional information. In addition, for External Managers, clients should review each manager's Form ADV 2A disclosure brochure and any contract they sign with the External Manager (in a dual contract relationship). The client is responsible for all such fees and expenses, as well as trading and custody costs of a broker-dealer/custodian other than RJA if utilized by that External Manager. Please see Item 12 of this brochure regarding brokerage practices.

#### **D. Prepayment of Fees**

As noted in Item 5(B) above, USA's advisory fees generally are paid in advance. Upon the termination of a client's advisory relationship, USA will issue a refund equal to any unearned management fee for the remainder of the quarter.

### **E. Outside Compensation for the Sale of Securities or Other Investment Products to Clients**

USA does not buy or sell securities and does not receive any compensation for securities transactions in any client account, other than the investment advisory fees noted above. However, as further described in Item 10, certain personnel of USA, in their individual capacities, are licensed as insurance professionals. Such persons earn commission-based compensation for selling insurance products to clients.

### **Item 6 - Performance-Based Fees and Side-by-Side Management**

USA does not charge performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. USA's fees are calculated as described in Item 5 above.

### **Item 7 - Types of Clients**

USA offers investment advisory services to individuals, high net worth individuals, high net worth families, trusts, estates, business entities, qualified retirement plans and donor advised funds. USA does not impose a minimum portfolio size or a minimum initial investment to open an account. However, USA reserves the right to accept or decline a potential client for any reason in its sole discretion.

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

#### **A. Methods of Analysis and Risk of Loss**

USA primarily employs fundamental analysis methods in developing investment strategies for its clients. Research and analysis from USA is based on numerous sources, including third-party research materials and publicly available materials, such as company annual reports, prospectuses, and press releases.

USA generally employs a long-term investment strategy for its clients, as consistent with their financial goals. At times, the Firm may also buy and sell positions that are more short-term in nature, depending on the goals of the client and/or the fundamentals of the security, sector or asset class.

Client portfolios with similar investment objectives and asset allocation goals may own different securities and investments. The client's portfolio size, tax sensitivity, desire for simplicity, income needs, long-term wealth transfer objectives, time horizon and choice of custodian are all factors that influence USA's investment recommendations.

Investing in securities involves a risk of loss. A client can lose all or a substantial portion of his/her investment. A client should be willing to bear such a loss. Some investments are intended only for sophisticated investors and can involve a high degree of risk.

## B. Material Risks Involved

Investing in securities involves a significant risk of loss which clients should be prepared to bear. USA's investment recommendations are subject to various market, currency, economic, political and business risks, and such investment decisions will not always be profitable. Clients should be aware that there may be a loss or depreciation of the value of the client's account. There can be no assurance that the client's investment objectives will be obtained and no inference to the contrary should be made.

Generally, the market value of equity stocks will fluctuate with market conditions, and small-stock prices generally will fluctuate more than large-stock prices. The market value of fixed income securities will generally fluctuate inversely with interest rates and other market conditions prior to maturity. Fixed income securities are obligations of the issuer to make payments of principal and/or interest on future dates, and include, among other securities: bonds, notes and debentures issued by corporations; debt securities issued or guaranteed by the U.S. government or one of its agencies or instrumentalities, or by a non-U.S. government or one of its agencies or instrumentalities; municipal securities; and mortgage-backed and asset-backed securities. These securities may pay fixed, variable, or floating rates of interest, and may include zero coupon obligations and inflation-linked fixed income securities. The value of longer duration fixed income securities will generally fluctuate more than shorter duration fixed income securities. Investments in overseas markets also pose special risks, including currency fluctuation and political risks, and it may be more volatile than that of a U.S. only investment. Such risks are generally intensified for investments in emerging markets. In addition, there is no assurance that a mutual fund or ETF will achieve its investment objective. Past performance of investments is no guarantee of future results.

Additional risks involved in the securities recommended by USA include, among others:

- *Stock market risk*, which is the chance that stock prices overall will decline. The market value of equity securities will generally fluctuate with market conditions. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. Prices of equity securities tend to fluctuate over the short term as a result of factors affecting the individual companies, industries or the securities market as a whole. Equity securities generally have greater price volatility than fixed income securities.
- *Sector risk*, which is the chance that significant problems will affect a particular sector, or that returns from that sector will trail returns from the overall stock market. Daily fluctuations in specific market sectors are often more extreme than fluctuations in the overall market.
- *Issuer risk*, which is the risk that the value of a security will decline for reasons directly related to the issuer, such as management performance, financial leverage, and reduced demand for the issuer's goods or services.
- *Non-diversification risk*, which is the risk of focusing investments in a small number of issuers, industries or foreign currencies, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be.
- *Value investing risk*, which is the risk that value stocks do not increase in price, not issue the anticipated stock dividends, or decline in price, either because the market fails to recognize the stock's intrinsic value, or because the expected value was misgauged. If the market does not recognize that the securities are undervalued, the prices of those securities might not appreciate as anticipated. They also may decline in price even though in theory they are already undervalued. Value stocks are typically less volatile than growth stocks but may lag behind growth stocks in an up market.

- *Smaller company risk*, which is the risk that the value of securities issued by a smaller company will go up or down, sometimes rapidly and unpredictably as compared to more widely held securities. Investments in smaller companies are subject to greater levels of credit, market and issuer risk.
- *Foreign (non-U.S.) investment risk*, which is the risk that investing in foreign securities result in the portfolio experiencing more rapid and extreme changes in value than a portfolio that invests exclusively in securities of U.S. companies. Risks associated with investing in foreign securities include fluctuations in the exchange rates of foreign currencies that may affect the U.S. dollar value of a security, the possibility of substantial price volatility as a result of political and economic instability in the foreign country, less public information about issuers of securities, different securities regulation, different accounting, auditing and financial reporting standards and less liquidity than in the U.S. markets.
- *US government securities risk*, is the risk relating to securities backed by the credit of the government as a whole or only by the issuing agency. US Treasury bonds, notes and bills and some agency securities, such as those issued by the Federal Housing Administration and Ginnie Mae, are backed by the full faith and credit of the US government as to payment of principal and interest and are the highest quality government securities. Other securities issued by US government agencies or instrumentalities, such as securities issued by the Federal Home Loan Banks and Freddie Mac, are supported only by the credit of the agency that issued them, and not by the US government. Securities issued by the Federal Farm Credit System, the Federal Land Banks and Fannie Mae are supported by the agency's right to borrow money from the US Treasury under certain circumstances but are not backed by the full faith and credit of the US government. No assurance can be given that the US government would provide financial support to its agencies and instrumentalities if not required to do so by law.
- *Municipal securities risk*, is the risk related to securities issued by or on behalf of states, territories, possessions and local governments and their agencies and other instrumentalities. Municipal securities may be secured by the issuer's general obligations or by the revenue associated with a specific capital project. Both "general obligation" municipal bonds and "revenue" bonds are subject to interest rate, credit and market risk, and uncertainties related to the tax status of a municipal bond or the rights of investors invested in these securities. The ability of an issuer to make payments could be affected by litigation, legislation or other political events or the bankruptcy of the issuer. In the event of bankruptcy of such an issuer, a client account investing in the issuer's securities could experience delays in collecting principal and interest, and the client account may not, in all circumstances, be able to collect all principal and interest to which it is entitled. In addition, imbalances in supply and demand in the municipal market may result in a deterioration of liquidity and lack of price transparency in the market. At certain times, this may affect pricing, execution, and transaction costs associated with a particular trade. The value of certain municipal securities, in particular obligation debt, may also be adversely affected by rising health care costs, increasing unfunded pension liabilities, changes in accounting standards, and by the phasing out of federal programs providing financial support. Municipal securities may be less liquid than taxable bonds and there may be less publicly available information on the financial condition of municipal securities issuers than for issuers of other securities, and the investment performance of a client account investing in municipal securities may therefore be more dependent on the analytical abilities of USA than if the client account held other types of investments such as stocks or taxable bonds. The secondary market for municipal securities also tends to be less well-developed or liquid than many other securities markets, a by-product of lower capital commitments to the asset class by the dealer community, which may adversely affect a

client account's ability to sell municipal securities it holds at attractive prices or value municipal securities. Lower rated municipal bonds are subject to greater credit and market risk than higher quality municipal bonds.

- *Interest rate risk*, which is the chance that prices of fixed income securities decline because of rising interest rates. Similarly, the income from fixed income securities may decline because of falling interest rates.
- *Credit risk*, which is the chance that an issuer of a fixed income security will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that fixed income security to decline.
- *Exchange Traded Fund (ETF) risk*, which is the risk of an investment in an ETF, including the possible loss of principal. ETFs typically trade on a securities exchange and the prices of their shares fluctuate throughout the day based on supply and demand, which may not correlate to their net asset values. Although ETF shares will be listed on an exchange, there can be no guarantee that an active trading market will develop or continue. Owning an ETF generally reflects the risks of owning the underlying securities it is designed to track. ETFs are also subject to secondary market trading risks. In addition, an ETF may not replicate exactly the performance of the index it seeks to track for a number of reasons, including transaction costs incurred by the ETF, the temporary unavailability of certain securities in the secondary market, or discrepancies between the ETF and the index with respect to weighting of securities or number of securities held.
- *Management risk*, which is the risk that the investment techniques and risk analyses applied by USA may not produce the desired results and that legislative, regulatory, or tax developments, affect the investment techniques available to USA. There is no guarantee that a client's investment objectives will be achieved.
- *Investment Companies ("Mutual Funds") risk*, when an investor invests in mutual funds, the investor will bear additional expenses based on his/her pro rata share of the mutual fund's operating expenses, including the management fees. The risk of owning a mutual fund generally reflects the risks of owning the underlying investments the mutual fund holds.
- *Options risk*, is not suitable for everyone and options are complex securities. Option trading can be speculative in nature and carry substantial risk of loss. It is generally recommended that you invest only in options with risk capital. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an underlying asset at a specific price on or before a certain date (i.e., the expiration date). The two types of options are calls and puts. A call gives the holder the right to buy an asset at a certain price within a specific period of time. Calls are similar to having a long position on a stock. Buyers of calls hope that the stock will increase substantially before the option expires. A put gives the holder the right to sell an asset at a certain price within a specific period of time. Puts are very similar to having a short position on a stock. Buyers of puts hope that the price of the stock will fall before the option expires. Selling options is more complicated and can be even riskier. Option trading risks are closely related to stock risks, as stock options are a derivative of stocks.
- *Cybersecurity risk*, which is the risk related to unauthorized access to the systems and networks of USA and its service providers. The computer systems, networks and devices used by USA and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks or devices potentially can be

breached. A client could be negatively impacted as a result of a cybersecurity breach. Cybersecurity breaches can include unauthorized access to systems, networks or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow or otherwise disrupt operations, business processes or website access or functionality. Cybersecurity breaches cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or other compliance costs; as well as the inadvertent release of confidential information. Similar adverse consequences could result from cybersecurity breaches affecting issues of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers and other financial institutions; and other parties. In addition, substantial costs may be incurred by those entities in order to prevent any cybersecurity breaches in the future.

- *Alternative Investments / Private Funds risk*, investing in alternative investments is speculative, not suitable for all clients, and intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include:
  - loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices;
  - lack of liquidity in that there may be no secondary market for the investment and none expected to develop;
  - volatility of returns;
  - restrictions on transferring interests in the investment;
  - potential lack of diversification and resulting higher risk due to concentration of trading authority when a single adviser is utilized;
  - absence of information regarding valuations and pricing;
  - delays in tax reporting;
  - less regulation and higher fees than mutual funds;
  - risks associated with the operations, personnel, and processes of the manager of the funds investing in alternative investments.

There also are risks surrounding various insurance products that are recommended to USA clients from time to time. Such risks include but are not limited to loss of premiums. Prior to purchasing any insurance product, clients should carefully read the policy and applicable disclosure documents.

Clients are advised that they should only commit assets for management that can be invested for the long term, that volatility from investing can occur, and that all investing is subject to risk. USA does not guarantee the future performance of a client's portfolio, as investing in securities involves the risk of loss that clients should be prepared to bear.

Past performance of a security or a fund is not necessarily indicative of future performance or risk of loss.

### **Use of External Managers**

USA may select certain External Managers to manage a portion of its clients' assets. In these situations, the success of such recommendations relies to a great extent on the External Managers' ability to successfully implement their investment strategies. In addition, USA generally may not have the ability to supervise the External Managers on a day-to-day basis.

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

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client’s evaluation of the adviser and the integrity of the adviser’s management. USA has no information applicable to this Item.

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

#### Insurance Agent Activities

As mentioned above in Item 5, advisory persons of USA are licensed as insurance professionals. Such persons earn commission-based compensation for selling insurance products to clients. Insurance commissions earned by advisory persons who are insurance professionals are separate from and in addition to USA’s advisory fee. This practice presents a conflict of interest as an advisory person who is an insurance professional has an incentive to recommend insurance products for the purpose of generating commissions rather than solely based on client needs. USA addresses this conflict through disclosure and strives to make recommendations which are in the best interests of its clients. Clients are under no obligation to purchase insurance products through any person affiliated with USA. USA clients should understand that lower fees and/or commissions for comparable services may be available from other insurance providers.

#### Recommendation of External Managers

USA may recommend that clients use External Managers based on clients’ needs and suitability. USA does not receive separate compensation, directly or indirectly, from such External Managers for recommending that clients use their services. USA does not have any other business relationships with the recommended External Managers.

### **Item 11 – Code of Ethics, Participation or Interest in Client Transactions**

USA has a Code of Ethics (the “Code”) which requires USA’s employees (“supervised persons”) to comply with their legal obligations and fulfill the fiduciary duties owed to the Firm’s clients. Among other things, the Code of Ethics sets forth policies and procedures related to conflicts of interest, outside business activities, gifts and entertainment, compliance with insider trading laws and policies and procedures governing personal securities trading by supervised persons.

Personal securities transactions of supervised persons present potential conflicts of interest with the price obtained in client securities transactions or the investment opportunity available to clients. The Code addresses these potential conflicts by prohibiting securities trades that would breach a fiduciary duty to a client and requiring, with certain exceptions, supervised persons to report their personal securities holdings and transactions to USA for review by the Firm’s Chief Compliance Officer. The Code also requires supervised persons to obtain pre-approval of certain investments, including initial public offerings and limited offerings.

USA will provide a copy of the Code of Ethics to any client or prospective client upon request.

## Item 12 – Brokerage Practices

### A. Factors Used to Select Custodians and/or Broker-Dealers

USA participates in the RJA Ambassador Program custodial platform. USA will recommend that USA Wrap Fee Program clients establish brokerage accounts with RJA to maintain custody of clients' assets and to effect trades for their accounts. Raymond James and Associates, Inc., ("RJA"), member New York Stock Exchange/SIPC, is a "qualified custodian" as that term is described in Rule 206(4)-2 of the Advisers Act.

In recommending RJA, USA will consider a number of judgmental factors, including, without limitation: 1) clearance and settlement capabilities; 2) quality of confirmations and account statements; 3) the ability of the BD/Custodian to settle the trade promptly and accurately; 4) the financial standing, reputation and integrity of the BD/Custodian; 5) the BD/Custodian's access to markets, research capabilities, market knowledge, and any "value added" characteristics; 6) USA's past experience with the BD/Custodian; and 7) USA's past experience with similar trades. Recognizing the value of these factors, clients may pay a brokerage commission in excess of that which another broker might have charged for effecting the same transaction.

In exchange for using the services of RJA, USA may receive, without cost, computer software and related systems support that allows USA to monitor and service its clients' accounts maintained with RJA. RJA also makes available to the Firm products and services that benefit the Firm but may not directly benefit the client or the client's account. These products and services assist USA in managing and administering client accounts. They include investment research, both RJA's own and that of third parties. USA may use this research to service all or some substantial number of client accounts, including accounts not maintained at RJA. In addition to investment research, RJA also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

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

- educational conferences and events;
- technology and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

RJA may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to the Firm. RJA may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. RJA may also provide the Firm with other benefits such as occasional business entertainment of Firm personnel.

The benefits received by USA through its participation in the RJA custodial platform do not depend on the amount of brokerage transactions directed to RJA. In addition, there is no corresponding commitment made by USA to RJA to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of participation in the program. While as a fiduciary, we endeavor to act in our clients' best interests, our recommendation that clients maintain their assets in accounts at RJA will be based in part on the benefit to USA of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by RJA. The receipt of these benefits creates a potential conflict of interest and may indirectly influence USA's choice of RJA for custody and brokerage services.

USA will periodically review its arrangements with the BD/Custodians and other broker-dealers against other possible arrangements in the marketplace as it strives to achieve best execution on behalf of its clients. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including, but not limited to, the following:

- a broker-dealer's trading expertise, including its ability to complete trades, execute and settle difficult trades, obtain liquidity to minimize market impact and accommodate unusual market conditions, maintain anonymity, and account for its trade errors and correct them in a satisfactory manner;
- a broker-dealer's infrastructure, including order-entry systems, adequate lines of communication, timely order execution reports, an efficient and accurate clearance and settlement process, and capacity to accommodate unusual trading volume;
- a broker-dealer's ability to minimize total trading costs while maintaining its financial health, such as whether a broker-dealer can maintain and commit adequate capital when necessary to complete trades, respond during volatile market periods, and minimize the number of incomplete trades;
- a broker-dealer's ability to provide research and execution services, including advice as to the value or advisability of investing in or selling securities, analyses and reports concerning such matters as companies, industries, economic trends and political factors, or services incidental to executing securities trades, including clearance, settlement and custody; and
- a broker-dealer's ability to provide services to accommodate special transaction needs, such as the broker-dealer's ability to execute and account for client-directed arrangements and soft dollar arrangements, participate in underwriting syndicates, and obtain initial public offering shares.

USA's clients may utilize qualified custodians other than RJA for certain accounts and assets, particularly where clients have a previous relationship with such qualified custodians.

#### Brokerage for Client Referrals

USA does not select or recommend BD/Custodians based solely on whether or not it may receive client referrals from a BD/Custodian or third party.

### Client Directed Brokerage

Generally, for USA Wrap Fee Program clients the Firm does not accept instructions to custody a client account at a specific broker-dealer other than RJA and/or direct some or all of his/her brokerage transactions to a specific broker-dealer other than RJA. In such instances a client would be disadvantaged because the USA Wrap Fee Program fee does cover the cost of trades executed away from RJA.

### Trade Errors

USA's goal is to execute trades seamlessly and in the best interests of the client. In the event a trade error occurs, USA endeavors to identify the error in a timely manner, correct the error so that the client's account is in the position it would have been had the error not occurred, and, after evaluating the error, assess what action(s) might be necessary to prevent a recurrence of similar errors in the future. Trade errors generally are corrected through the use of a "trade error" account or similar account at RJA. USA works directly with RJA to take corrective action. In all cases, USA will take the appropriate measures to return the client's account to its intended position.

## **B. Trade Aggregation**

To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which the Firm's supervised persons may invest, the Firm will generally do so in a fair equitable manner in accordance with applicable rules promulgated under the Advisers Act and guidance provided by the staff of the SEC and consistent with policies and procedures established by the Firm.

## **Item 13 – Review of Accounts**

### **A. Periodic Reviews**

While USA Wrap Fee Program accounts are monitored on an ongoing basis, USA's investment adviser representatives seek to have at least one annual meeting with each client to conduct a formal review of the clients' accounts. Accounts are reviewed for consistency with the investment strategy and other parameters set forth for the account and to determine if any adjustments need to be made. When providing financial planning services to USA Wrap Fee Program Clients, USA continues to review any provided recommendations as part of the ongoing provision of investment management services.

### **B. Other Reviews and Triggering Factors**

In addition to the periodic reviews described above, reviews may be triggered by changes in an account holder's personal, tax or financial status. Other events that may trigger a review of an account are material changes in market conditions as well as macroeconomic and company- specific events. Clients are encouraged to notify USA of any changes in his/her personal financial situation that might affect his/her investment needs, objectives, or time horizon.

### **C. Regular Reports**

Written brokerage statements are generated no less than quarterly and are sent directly from the qualified custodian. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction unless confirmations have been waived.

USA may also determine to provide account statements and other reporting to clients on a periodic basis. Clients are urged to carefully review all custodial account statements and compare them to any statements and reports provided by USA. USA statements and reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

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

#### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

USA does not receive benefits from third parties for providing investment advice to clients.

#### **B. Compensation to Non-Supervised Persons for Client Referrals**

USA does not enter into agreements with individuals or organizations for the referral of clients.

### **Item 15 – Custody**

All clients must utilize a “qualified custodian” as detailed in Item 12. Clients are required to engage the custodian to retain their funds and securities and direct USA to utilize the custodian for the client’s securities transactions. USA’s agreement with clients and/or the clients’ separate agreements with the B/D Custodian may authorize USA through such BD/Custodian to debit the clients’ accounts for the amount of USA’s fee and to directly remit that fee to USA in accordance with applicable custody rules.

The BD/Custodian recommended by USA has agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management fees paid directly to USA. USA encourages clients to review the official statements provided by the custodian, and to compare such statements with any reports or other statements received from USA. For more information about custodians and brokerage practices, see “Item 12 - Brokerage Practices.”

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

Clients have the option of providing USA with investment discretion on their behalf, pursuant to a grant of a limited power of attorney contained in USA’s client agreement. By granting USA investment discretion, a client authorizes USA to direct securities transactions and determine which securities are bought and sold, the total amount to be bought and sold, and the costs at which the transactions will be effected. Clients may impose reasonable limitations in the form of specific constraints on any of these areas of discretion with the consent and written acknowledgement of USA if USA determines, in its sole discretion, that the conditions would not materially impact the performance of a management strategy or prove overly burdensome for USA. See also Item 4(C), Client-Tailored Advisory Services.

**Item 17 – Voting Client Securities**

USA does not accept the authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for all and any securities maintained in client portfolios.

**Item 18 – Financial Information**

USA is not required to disclose any financial information pursuant to this item due to the following:

- a) USA does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of rendering services;
- b) USA is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts; and
- c) USA has never been the subject of a bankruptcy petition.

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# UNION STRATEGIC ADVISORS

**UNION STRATEGIC ADVISORS LLC**

**FORM ADV PART 2A, APPENDIX 1**

**WRAP FEE PROGRAM BROCHURE**

**Item 1 – Cover Page**

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This wrap fee program brochure provides information about the qualifications and business practices of Union Strategic Advisors LLC. If you have any questions regarding the contents of this brochure, please contact our Chief Compliance Officer, Kevin Kim by telephone at 513-977-8615 or by email at [kevin.kim@dinsmorecomplianceservices.com](mailto:kevin.kim@dinsmorecomplianceservices.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Union Strategic Advisors is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training. Additional information about Union Strategic Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

April 2, 2026

## **Item 2 – Material Changes**

Form ADV Part 2A, Appendix 1 requires registered investment advisers to amend their wrap fee program brochure when information becomes materially inaccurate. If there are any material changes to an adviser's wrap fee program disclosure brochure since the last annual update of the wrap fee program disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Union Strategic Advisors is a newly registered investment adviser and this wrap fee program brochure was initially filed as part of that registration. Accordingly, there are no material changes to report.

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#### **Item 4 – Services, Fees and Compensation**

Union Strategic Advisors, LLC (“USA” or the “Firm”) is a corporation organized in the State of Ohio. USA is an investment advisory firm registered with the United States Securities and Exchange Commission (“SEC”). USA is owned by Timothy Recker and Alex Holtmeier.

The USA wrap fee program (the “USA Wrap Fee Program”) is an investment management program sponsored by USA. Investment management services are provided to clients of USA through the USA Wrap Fee Program.

In addition to the USA Wrap Fee Program, the Firm offers investment management services to certain types of qualified plan clients and business consulting services to small and medium size businesses and business owners under different arrangements than those described in this Brochure. Information about that service is contained in the Firm’s Form ADV Part 2A.

##### **A. Description of the USA Wrap Fee Program**

USA offers investment management services on a discretionary basis and non-discretionary basis. All investment advice provided is customized to each client’s investment objectives and financial needs. The information provided by the client, together with any other information relating to the client’s overall financial circumstances, will be used by USA to determine the appropriate portfolio asset allocation and investment strategy for the client. USA provides investment management services to clients through the USA Wrap Fee Program.

The securities utilized by USA in the USA Wrap Fee Program client accounts consist of registered mutual funds, exchange traded funds (ETFs), equity securities, options on equity securities, corporate bonds, state and local municipality fixed income instruments (“municipal securities”), US government and agency securities, fixed annuities and private funds/alternative investments, if we determine such investments fit within a client’s objectives and are in the best interest of our clients.  
of our clients.

USA may further recommend to clients that all or a portion of their USA Wrap Fee Program investment portfolio be managed on a discretionary basis by one or more unaffiliated money managers or investment platforms (“External Managers”). The client may be required to enter into a separate agreement with the External Manager(s), which will set forth the terms and conditions of the client’s engagement of the External Manager. USA generally renders services to the client relative to the discretionary selection of External Managers. USA also assists in establishing the client’s investment objectives for the assets managed by External Managers, monitors and reviews the account performance and defines any restrictions on the account. The investment management fees charged by the designated External Managers are exclusive of, and in addition to, the annual investment management services fee charged by USA. For External Managers made available through the B/D Custodian RJA, custody and securities transactions commissions are included within the USA Wrap Fee Program fee. If an External Manager is utilized that engages in brokerage transactions and/or custody services with a broker-dealer/custodian other than RJA, the fees charged by that broker-dealer/custodian will be exclusive of, and in addition to, the annual USA Wrap Program fee.

Raymond James and Associates, Inc. (“RJA”), member New York Stock Exchange/SIPC, is a “qualified custodian” as that term is described in Rule 206(4)-2 of the Investment Advisers Act of 1940. USA participates in the RJA Ambassador Program custodial platform. USA will recommend that USA Wrap Fee Program clients establish brokerage accounts with RJA to maintain custody of clients’ assets and to effect trades for their accounts.

Generally, financial planning services are also provided to USA Wrap Fee Program clients. Provided financial planning services work to set forth goals, objectives and implementation strategies for the client over the long-term. Depending upon individual client requirements, a financial plan will include recommendations for retirement planning, educational planning, estate planning, cash flow planning, tax planning and insurance needs and analysis. When providing financial planning services to USA Wrap Fee Program Clients, USA continues to review any provided financial plan as part of the ongoing provision of investment management services. Clients should notify us promptly anytime there is a change in their financial situation, goals, objectives, or needs and/or if there is any change to the financial information initially provided to us.

Clients are under no obligation to implement any of the recommendations provided in their written financial plan. However, should a client decide to proceed with the implementation of the investment recommendations then the client can either have USA implement those recommendations or utilize the services of any investment adviser or broker-dealer of their choice.

USA cannot provide any guarantees or promises that a client’s financial goals and objectives will be met.

**Note for IRA and Retirement Plan Clients:** When USA provides investment advice to you regarding your retirement plan account or individual retirement account, USA is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way USA makes money creates some conflicts with your interests, so USA operates under a special rule that requires USA to act in your best interest and not put USA’s interest ahead of yours.

**Note Regarding Tax or Legal Advice:** In providing services, USA does not offer or otherwise provide tax or legal advice. USA will, at a client’s direction and approval, work with a client’s existing tax or legal professionals to assist in the provision of the services. Fees charged by any tax, legal or other third-party professionals are the responsibility of the client. USA may refer professionals; however, there is no compensation to USA for these referrals, and clients are under no obligation to use the referred service providers. Within its discretion, USA may determine to reimburse a client for, or otherwise pay, the tax return preparation fee charged by the tax professional engaged by the client.

## **B. The USA Wrap Fee Program Fee**

The USA Wrap Fee Program Fee covers USA’s advisory services, custody and commissions for securities transactions effected through RJA. The number of transactions made in clients’ accounts, the size of the accounts, and the securities used to construct a portfolio, as well as the commissions charged for each transaction, determines the relative cost of the USA Wrap Fee Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Participants in the USA Wrap Fee Program may pay a higher or lower aggregate fee than if the investment management and brokerage services

are purchased separately. USA does not charge its clients higher advisory fees based on their trading activity, but clients should be aware that USA may have an incentive to limit its trading activities in client accounts because USA is charged for executed trades. USA addresses this conflict of interest by this disclosure and by its policies and procedures which work to ensure that accounts are managed in accordance with clients' goals and objectives without consideration of trading costs incurred by USA.

#### Cash and Margin Positions

At any specific point in time, depending upon perceived or anticipated market conditions or events (there being no guarantee that such anticipated market conditions/events will occur), USA may maintain cash positions for defensive or other purposes. All cash positions (money markets, etc.) will be included as part of assets under management for purposes of calculating the USA Wrap Fee Program Fee. In addition, USA does not reduce management fees for margin borrowing, regardless of whether the assets are in cash or other securities. USA has a financial incentive to recommend that clients borrow money for the purchase of additional securities for the client's account managed by USA or otherwise not liquidate some or all the assets USA manages. USA addresses this conflict of interest by this disclosure and working and working to ensure that any recommendation to a client regarding the use of margin is suitable for the client.

#### Additional Fees and Expenses

In addition to the USA Wrap Fee Program Fee, clients will be responsible for transfer taxes, odd lot differentials, exchange fees, interest charges, ADR processing fees and any charges, taxes or other fees mandated by any federal, state or other applicable law, retirement plan account fees (where applicable), electronic fund and wire fees. Furthermore, USA fees do not cover transaction fees or "trade away" fees imposed for trades placed away from RJA. In addition, for External Managers, clients should review each manager's Form ADV 2A disclosure brochure and any contract they sign with the External Manager (in a dual contract relationship). The client is responsible for all such fees and expenses, as well as trading and custody costs of a broker-dealer/custodian other than RJA if utilized by that External Manager.

#### Fee Schedule

USA charges fees based on a percentage of assets under management. As noted above, in providing financial planning services to USA Wrap Fee Program Clients, USA does not charge an additional fee. The specific fees charged by USA for services provided will be set forth in each client's agreement.

In providing investment management services pursuant to the USA Wrap Fee Program, USA charges an annual investment management services fee that is agreed upon with each client and set forth in an agreement executed by USA and the client. The USA Wrap Fee Program investment management services fee is based on a percentage of the value of assets under management and is generally paid quarterly in advance. When a client's account is opened, the USA Wrap Fee Program investment management services fee is billed for the remainder of the current quarterly billing period and is based on the client's initial contribution to the client account. Subsequent quarterly USA Wrap Fee Program investment management services fees will be based on the client's account value as of the last business day of the previous calendar quarter. If cash or

securities, or a combination thereof, amounting to at least \$100,000 are deposited to or withdrawn from a USA Wrap Fee Program client's account on an individual business day in the first two months of the quarter, USA will (i) assess investment management services fees to the deposited assets based on the value of the assets on the date of deposit for the pro rata number of days remaining in the quarter, or (ii) refund prepaid USA Wrap Fee Program investment management services fees based on the value of the assets on the date of withdrawal for the pro rata number of days remaining in the quarter. No additional USA Wrap Fee Program investment management services fees or adjustments to previously assessed USA Wrap Fee Program investment management services fees will be made in connection with deposits or withdrawals that occur during the last month of the quarter.

For purposes of USA Wrap Fee Program investment management services fee calculation, USA utilizes third party sources, such as pricing services, custodians, fund administrators, and client-provided sources. For purposes of fee calculation, the asset value of USA Wrap Fee Program client accounts include cash and cash equivalents, as well as margined securities. USA does not reduce USA Wrap Fee Program investment management fees for margin borrowing, regardless of whether the assets are in cash or other securities. USA has a financial incentive to recommend that clients borrow money for the purchase of additional securities for the client's USA Wrap Fee Program account managed by USA or otherwise not liquidate some or all the assets USA manages. USA addresses this conflict of interest through this disclosure and working to ensure that any recommendation to a client regarding the use of margin is suitable for the client.

The annual USA Wrap Fee Program investment management services fee ranges up to 1.00%.

Notwithstanding the foregoing, USA and the client may choose to negotiate an annual investment management services fee that varies from the range set forth above. Factors upon which a different annual investment management services fee may be based include, but are not limited to, the size and nature of the relationship, the services rendered, the nature and complexity of the products and investments involved, time commitments, and travel requirements. The investment management services fee charged by the Firm will apply to all of the client's assets under management, unless specifically excluded in the client agreement. Although USA believes that its fees are competitive, clients should understand that lower fees for comparable services may be available from other sources and firms.

The investment advisory agreement between USA and the client may be terminated at will by either USA or the client upon written notice. USA does not impose termination fees when the client terminates the investment advisory relationship, except when agreed upon in advance.

### **C. Compensation for Recommending the USA Wrap Fee Program**

USA does not have any arrangements where it receives an economic benefit from a third party for recommending the USA Wrap Fee Program.

### **Item 5 – Account Requirements and Types of Clients**

Investment management services through the USA Wrap Fee Program are provided to individuals, high net worth individuals, high net worth families, trusts, estates, business entities, qualified retirement plans and

donor advised funds. USA does not impose a minimum portfolio size or a minimum initial investment to open an account. However, USA reserves the right to accept or decline a potential client for any reason in its sole discretion.

### **Item 6 – Portfolio Manager Selection and Evaluation**

The USA Wrap Fee Program utilize advisers, the External Managers, in addition to USA. RJA provides access to External Managers that have been subject to initial and ongoing due diligence and reviews by RJA. In making External Managers available RJA evaluates External Managers' investment philosophy and policies, records as an investment adviser, and the investment disciplines or strategies the External Manager is able to offer. In addition, in determining whether to continue to make an External Manager available RJA conducts ongoing reviews of performance calculations, peer comparisons, and examination of portfolio characteristics and holdings. This RJA External Manager information is made available to, and reviewed by, USA.

Performance information provided by External Managers is compared by RJA to publicly available resources for reasonableness. External Manager provided performance information is not independently verified by RJA or USA.

#### **A. Advisory Services Offered by USA**

See Item 4 of this Wrap Fee USA Wrap Fee Program Brochure for a full description of the USA Wrap Fee Program. In addition to the USA Wrap Fee Program, USA provides investment management on a non-wrap fee basis to certain types of retirement plan clients.

##### Investment Management Services to Retirement Plans

USA offers discretionary and non-discretionary advisory services to qualified plans, including 401k plans. These services include, depending upon the needs of the plan client, recommending, or for discretionary clients selecting, investment options for plans to offer to participants, ongoing monitoring of a plan's investment options, assisting plan fiduciaries in creating and/or updating the plan's written investment policy statements, working with plan service providers, and providing general investment education to plan participants.

##### Business Consulting Services

USA offers consulting services to small and medium size businesses and business owners. Depending upon the needs of the business and the business owner, consulting services may include information and recommendations regarding growth strategies, business entity value enhancement, exit and sale strategies, next generation transition strategies and tax considerations.

#### **B. Client Tailored Advisory Services**

Clients may impose reasonable restrictions on the management of their accounts if USA determines, in its sole discretion, that the conditions would not materially impact the performance of a management strategy or prove overly burdensome for USA's management efforts.

#### **C. The USA Wrap Fee Program**

As described above, USA is one of the portfolio managers of the USA Wrap Fee Program. See Item 4 above for a description of the USA Wrap Fee Program and the other advisory services offered by USA.

Clients may impose reasonable restrictions on the management of their accounts if USA determines, in its sole discretion, that the conditions would not materially impact the performance of a management strategy or prove overly burdensome for USA's management efforts. As a portfolio manager, USA receives the USA Wrap Fee Program Fee after the payment of the brokerage, execution and custodian fees and expenses.

#### **D. Performance-Based Fees and Side-By-Side Management**

USA does not charge performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. USA's fees are calculated as described in Item 5 above.

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

##### Methods of Analysis and Investment Strategies

USA primarily employs fundamental analysis methods in developing investment strategies for its clients. Research and analysis from USA is based on numerous sources, including third-party research materials and publicly available materials, such as company annual reports, prospectuses, and press releases.

USA generally employs a long-term investment strategy for its clients, as consistent with their financial goals. At times, the Firm may also buy and sell positions that are more short-term in nature, depending on the goals of the client and/or the fundamentals of the security, sector or asset class.

Client portfolios with similar investment objectives and asset allocation goals may own different securities and investments. The client's portfolio size, tax sensitivity, desire for simplicity, income needs, long-term wealth transfer objectives, time horizon and choice of custodian are all factors that influence USA's investment recommendations.

Investing in securities involves a risk of loss. A client can lose all or a substantial portion of his/her investment. A client should be willing to bear such a loss. Some investments are intended only for sophisticated investors and can involve a high degree of risk.

##### Material Risks Involved

Investing in securities involves a significant risk of loss which clients should be prepared to bear. USA's investment recommendations are subject to various market, currency, economic, political and business risks, and such investment decisions will not always be profitable. Clients should be aware that there may be a loss or depreciation to the value of the client's account. There can be no assurance that the client's investment objectives will be obtained and no inference to the contrary should be made.

Generally, the market value of equity stocks will fluctuate with market conditions, and small-stock prices generally will fluctuate more than large-stock prices. The market value of fixed income securities will generally fluctuate inversely with interest rates and other market conditions prior to maturity. Fixed income securities are obligations of the issuer to make payments of principal and/or

interest on future dates, and include, among other securities: bonds, notes and debentures issued by corporations; debt securities issued or guaranteed by the U.S. government or one of its agencies or instrumentalities, or by a non-U.S. government or one of its agencies or instrumentalities; municipal securities; and mortgage-backed and asset-backed securities. These securities may pay fixed, variable, or floating rates of interest, and may include zero coupon obligations and inflation-linked fixed income securities. The value of longer duration fixed income securities will generally fluctuate more than shorter duration fixed income securities. Investments in overseas markets also pose special risks, including currency fluctuation and political risks, and it may be more volatile than that of a U.S. only investment. Such risks are generally intensified for investments in emerging markets. In addition, there is no assurance that a mutual fund or ETF will achieve its investment objective. Past performance of investments is no guarantee of future results.

Additional risks involved in the securities recommended by USA include, among others:

- *Stock market risk*, which is the chance that stock prices overall will decline. The market value of equity securities will generally fluctuate with market conditions. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. Prices of equity securities tend to fluctuate over the short term as a result of factors affecting the individual companies, industries or the securities market as a whole. Equity securities generally have greater price volatility than fixed income securities.
- *Sector risk*, which is the chance that significant problems will affect a particular sector, or that returns from that sector will trail returns from the overall stock market. Daily fluctuations in specific market sectors are often more extreme than fluctuations in the overall market.
- *Issuer risk*, which is the risk that the value of a security will decline for reasons directly related to the issuer, such as management performance, financial leverage, and reduced demand for the issuer's goods or services.
- *Non-diversification risk*, which is the risk of focusing investments in a small number of issuers, industries or foreign currencies, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be.
- *Value investing risk*, which is the risk that value stocks not increase in price, not issue the anticipated stock dividends, or decline in price, either because the market fails to recognize the stock's intrinsic value, or because the expected value was misgauged. If the market does not recognize that the securities are undervalued, the prices of those securities might not appreciate as anticipated. They also may decline in price even though in theory they are already undervalued. Value stocks are typically less volatile than growth stocks, but may lag behind growth stocks in an up market.
- *Smaller company risk*, which is the risk that the value of securities issued by a smaller company will go up or down, sometimes rapidly and unpredictably as compared to more widely held securities. Investments in smaller companies are subject to greater levels of credit, market and issuer risk.
- *Foreign (non-U.S.) investment risk*, which is the risk that investing in foreign securities result in the portfolio experiencing more rapid and extreme changes in value than a portfolio that invests exclusively in securities of U.S. companies. Risks associated with investing in foreign securities include fluctuations in the exchange rates of foreign currencies that may affect the U.S. dollar value of a security, the possibility of substantial price volatility as a result of political and economic instability in the foreign

country, less public information about issuers of securities, different securities regulation, different accounting, auditing and financial reporting standards and less liquidity than in the U.S. markets.

- *US government securities risk*, is the risk relating to securities backed by the credit of the government as a whole or only by the issuing agency. US Treasury bonds, notes and bills and some agency securities, such as those issued by the Federal Housing Administration and Ginnie Mae, are backed by the full faith and credit of the US government as to payment of principal and interest and are the highest quality government securities. Other securities issued by US government agencies or instrumentalities, such as securities issued by the Federal Home Loan Banks and Freddie Mac, are supported only by the credit of the agency that issued them, and not by the US government. Securities issued by the Federal Farm Credit System, the Federal Land Banks and Fannie Mae are supported by the agency's right to borrow money from the US Treasury under certain circumstances but are not backed by the full faith and credit of the US government. No assurance can be given that the US government would provide financial support to its agencies and instrumentalities if not required to do so by law.
- *Municipal securities risk*, is the risk related to securities issued by or on behalf of states, territories, possessions and local governments and their agencies and other instrumentalities. Municipal securities may be secured by the issuer's general obligations or by the revenue associated with a specific capital project. Both "general obligation" municipal bonds and "revenue" bonds are subject to interest rate, credit and market risk, and uncertainties related to the tax status of a municipal bond or the rights of investors invested in these securities. The ability of an issuer to make payments could be affected by litigation, legislation or other political events or the bankruptcy of the issuer. In the event of bankruptcy of such an issuer, a client account investing in the issuer's securities could experience delays in collecting principal and interest, and the client account may not, in all circumstances, be able to collect all principal and interest to which it is entitled. In addition, imbalances in supply and demand in the municipal market may result in a deterioration of liquidity and lack of price transparency in the market. At certain times, this may affect pricing, execution, and transaction costs associated with a particular trade. The value of certain municipal securities, in particular obligation debt, may also be adversely affected by rising health care costs, increasing unfunded pension liabilities, changes in accounting standards, and by the phasing out of federal programs providing financial support. Municipal securities may be less liquid than taxable bonds and there may be less publicly available information on the financial condition of municipal securities issuers than for issuers of other securities, and the investment performance of a client account investing in municipal securities may therefore be more dependent on the analytical abilities of USA than if the client account held other types of investments such as stocks or taxable bonds. The secondary market for municipal securities also tends to be less well-developed or liquid than many other securities markets, a by-product of lower capital commitments to the asset class by the dealer community, which may adversely affect a client account's ability to sell municipal securities it holds at attractive prices or value municipal securities. Lower rated municipal bonds are subject to greater credit and market risk than higher quality municipal bonds.

- *Interest rate risk*, which is the chance that prices of fixed income securities decline because of rising interest rates. Similarly, the income from fixed income securities may decline because of falling interest rates.
- *Credit risk*, which is the chance that an issuer of a fixed income security will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that fixed income security to decline.
- *Exchange Traded Fund (ETF) risk*, which is the risk of an investment in an ETF, including the possible loss of principal. ETFs typically trade on a securities exchange and the prices of their shares fluctuate throughout the day based on supply and demand, which may not correlate to their net asset values. Although ETF shares will be listed on an exchange, there can be no guarantee that an active trading market will develop or continue. Owning an ETF generally reflects the risks of owning the underlying securities it is designed to track. ETFs are also subject to secondary market trading risks. In addition, an ETF may not replicate exactly the performance of the index it seeks to track for a number of reasons, including transaction costs incurred by the ETF, the temporary unavailability of certain securities in the secondary market, or discrepancies between the ETF and the index with respect to weighting of securities or number of securities held.
- *Management risk*, which is the risk that the investment techniques and risk analyses applied by USA may not produce the desired results and that legislative, regulatory, or tax developments, affect the investment techniques available to USA. There is no guarantee that a client's investment objectives will be achieved.
- *Investment Companies ("Mutual Funds") risk*, when an investor invests in mutual funds, the investor will bear additional expenses based on his/her pro rata share of the mutual fund's operating expenses, including the management fees. The risk of owning a mutual fund generally reflects the risks of owning the underlying investments the mutual fund holds.
- *Options risk*, is not suitable for everyone and options are complex securities. Option trading can be speculative in nature and carry substantial risk of loss. It is generally recommended that you invest only in options with risk capital. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an underlying asset at a specific price on or before a certain date (i.e., the expiration date). The two types of options are calls and puts. A call gives the holder the right to buy an asset at a certain price within a specific period of time. Calls are similar to having a long position on a stock. Buyers of calls hope that the stock will increase substantially before the option expires. A put gives the holder the right to sell an asset at a certain price within a specific period of time. Puts are very similar to having a short position on a stock. Buyers of puts hope that the price of the stock will fall before the option expires. Selling options is more complicated and can be even riskier. Option trading risks are closely related to stock risks, as stock options are a derivative of stocks.
- *Cybersecurity risk*, which is the risk related to unauthorized access to the systems and networks of USA and its service providers. The computer systems, networks and devices used by USA and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures,

infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach. Cybersecurity breaches can include unauthorized access to systems, networks or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow or otherwise disrupt operations, business processes or website access or functionality. Cybersecurity breaches cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or other compliance costs; as well as the inadvertent release of confidential information. Similar adverse consequences could result from cybersecurity breaches affecting issues of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers and other financial institutions; and other parties. In addition, substantial costs may be incurred by those entities in order to prevent any cybersecurity breaches in the future.

- *Alternative Investments / Private Funds risk*, investing in alternative investments is speculative, not suitable for all clients, and intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include:
  - loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices;
  - lack of liquidity in that there may be no secondary market for the investment and none expected to develop;
  - volatility of returns;
  - restrictions on transferring interests in the investment;
  - potential lack of diversification and resulting higher risk due to concentration of trading authority when a single adviser is utilized;
  - absence of information regarding valuations and pricing;
  - delays in tax reporting;
  - less regulation and higher fees than mutual funds;
  - risks associated with the operations, personnel, and processes of the manager of the funds investing in alternative investments.

There also are risks surrounding various insurance products that are recommended to USA clients from time to time. Such risks include, but are not limited to loss of premiums. Prior to purchasing any insurance product, clients should carefully read the policy and applicable disclosure documents.

Clients are advised that they should only commit assets for management that can be invested for the long term, that volatility from investing can occur, and that all investing is subject to risk. USA does not guarantee the future performance of a client's portfolio, as investing in securities involves the risk of loss that clients should be prepared to bear.

Past performance of a security or a fund is not necessarily indicative of future performance or risk of loss.

**F. Voting Client Securities**

USA does not accept the authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for all and any securities maintained in client USA Wrap Fee Program portfolios.

**Item 7 – Client Information Provided to Portfolio Managers**

Any utilized External Managers for a client are selected by USA. External Managers are not provided client information since USA has the responsibility to determine whether the utilization of an External Manager is suitable for a client. External Managers have access to client portfolio information in their execution of advisory services for a client.

**Item 8 – Client Contact with Portfolio Managers**

Clients may contact USA personnel during regular business hours to discuss the USA Wrap Fee Program and their USA Wrap Fee Program accounts. Therefore, no restrictions are placed on a client's ability to contact or consult with USA. Clients are not permitted access to contact or consult with any utilized External Managers.

**Item 9 – Additional Information****A. Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of the adviser and the integrity of the adviser's management. USA has no information applicable to this Item.

**B. Other Financial Industry Activities and Affiliations**

Advisory persons of USA are licensed as insurance professionals. Such persons earn commission-based compensation for selling insurance products to clients. Insurance commissions earned by advisory persons who are insurance professionals are separate from and in addition to USA's advisory fee. This practice presents a conflict of interest as an advisory person who is an insurance professional has an incentive to recommend insurance products for the purpose of generating commissions rather than solely based on client needs. USA addresses this conflict through disclosure and strives to make recommendations which are in the best interests of its clients. Clients are under no obligation to purchase insurance products through any person affiliated with USA. USA clients should understand that lower fees.

USA may recommend that clients use External Managers based on clients' needs and suitability. USA does not receive separate compensation, directly or indirectly, from such External Managers for recommending that clients use their services. USA does not have any other business relationships with the recommended External Managers.

**C. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

USA has a Code of Ethics (the "Code") which requires USA's employees ("supervised persons") to comply with their legal obligations and fulfill the fiduciary duties owed to the Firm's clients. Among other things, the Code of Ethics sets forth policies and procedures related to conflicts of interest, outside business

activities, gifts and entertainment, compliance with insider trading laws and policies and procedures governing personal securities trading by supervised persons.

Personal securities transactions of supervised persons present potential conflicts of interest with the price obtained in client securities transactions or the investment opportunity available to clients. The Code addresses these potential conflicts by prohibiting securities trades that would breach a fiduciary duty to a client and requiring, with certain exceptions, supervised persons to report their personal securities holdings and transactions to USA for review by the Firm's Chief Compliance Officer. The Code also requires supervised persons to obtain pre-approval of certain investments, including initial public offerings and limited offerings.

USA will provide a copy of the Code of Ethics to any client or prospective client upon request.

#### **D. Review of Accounts**

While USA Wrap Fee Program accounts are monitored on an ongoing basis, USA's investment adviser representatives seek to have at least one annual meeting with each client to conduct a formal review of the clients' accounts. Accounts are reviewed for consistency with the investment strategy and other parameters set forth for the account and to determine if any adjustments need to be made. When providing financial planning services to USA Wrap Fee Program Clients, USA continues to review any provided financial plan as part of the ongoing provision of investment management services.

##### Other Reviews and Triggering Factors

In addition to the periodic reviews described above, reviews may be triggered by changes in an account holder's personal, tax or financial status. Other events that may trigger a review of an account are material changes in market conditions as well as macroeconomic and company-specific events. Clients are encouraged to notify USA of any changes in his/her personal financial situation that might affect his/her investment needs, objectives, or time horizon.

##### Regular Reports

Written brokerage statements are generated no less than quarterly and are sent directly from the qualified custodian. These reports list the account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction unless confirmations have been waived.

USA may also determine to provide account statements and other reporting to clients on a periodic basis. Clients are urged to carefully review all custodial account statements and compare them to any statements and reports provided by USA. USA statements and reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

#### **E. Client Referrals and Other Compensation**

##### Client Referrals

USA does not receive benefits from third parties for providing investment advice to clients. In addition, USA does not enter into agreements with individuals or organizations for the referral of clients.

### Other Compensation

As described above, USA requires that USA Wrap Fee Program clients utilize RJA as the custodian/broker-dealer for their USA Wrap Fee Program account(s). While there is no direct link between the investment advice USA provides and participation in the RJA program, USA management receives certain economic benefits from the RJA program. These benefits may include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research, pricing information and other market data, facilitates the payment of USA's fees from its clients' accounts, and assists with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of USA's accounts, including accounts not held at RJA. RJA may also make available to USA other services intended to help USA manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, and marketing. In addition, RJA may make available, arrange and/or pay for these types of services to be rendered to USA by independent third parties. RJA may discount or waive fees it would otherwise charge for some of these services, pay all or a part of the fees of a third-party providing these services to USA, and/or RJA may pay for travel expenses relating to participation in such training. Finally, participation in the RJA program provides USA with access to mutual funds which normally require significantly higher minimum initial investments or are normally available only to institutional investors.

The benefits received through participation in the RJA program do not necessarily depend upon the proportion of transactions directed to RJA. The benefits are received by USA, in part because of commission revenue generated for RJA by USA's clients. This means that the investment activity in client accounts is beneficial to USA, because RJA does not assess a fee to USA for these services. This creates an incentive for USA to continue to recommend RJA to its clients. While it may be possible to obtain similar custodial, execution and other services elsewhere at a lower cost, USA believes that RJA provides a competitive combination of these services. These services are not soft dollar arrangements, but are part of the institutional platform offered by RJA.

### **F. Financial Information**

USA is not required to disclose any financial information pursuant to this item due to the following:

- a) USA does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of rendering services;
- b) USA is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts; and
- c) USA has never been the subject of a bankruptcy petition.



# UNION STRATEGIC ADVISORS

**Part 2B of Form ADV  
Investment Advisor Brochure Supplement**

**Union Strategic Advisors, LLC  
9825 Kenwood Road  
Suite 103  
Blue Ash, Ohio 45242  
513-699-5200  
[www.unionstrategic.com](http://www.unionstrategic.com)**

**Version Date February 16, 2026**

**This Form ADV 2B (“Brochure Supplement”) provides information about ALEX T. HOLTMEIER, TIMOTHY M. RECKER, AND ZACHARY HOLTMEIER, that supplements the Union Strategic Advisors, LLC (“USA” or the “Advisor”). Disclosure Brochure. You should have received a copy of that Disclosure Brochure. Please contact Compliance at [kevin.kim@dinsmorecomplianceservices.com](mailto:kevin.kim@dinsmorecomplianceservices.com) or 513-699-5200 if you did not receive the Union Strategic Advisors, LLC Disclosure Brochure or if you have any questions about the contents of this supplement.**

Additional information about ALEX HOLTMEIER, TIMOTHY RECKER, AND ZACHARY HOLTMEIER, is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Educational Background:** Bachelor of Business Administration, Finance, University of Cincinnati, 2009

**Professional Certifications** Accredited Investment Fiduciary<sup>®</sup> - More information on [Appendix A](#)  
Chartered Retirement Plans Specialist<sup>SM</sup> - - More information on [Appendix A](#)  
Series 7 – General Securities Representative Examination  
Series 66 – Uniform Combined State Law Examination

**Business Experience:**

2026 – Present	Union Strategic Advisors, LLC. Principal & Financial Advisor
2010 – 2026	Raymond James & Associates, Inc. Financial Advisor
2010 – 2026	Raymond James & Associates, Inc. Registered Representative

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

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Holtmeier.***

However, we do encourage you to independently view the background of Mr. Holtmeier on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual **CRD# 5854334**.

**Other Business Activities:** Mr. Holtmeier is dedicated to providing investment advisory services to USA's clients. Compensation for Mr. Holtmeier consists of a regular salary and potential eligibility for bonus compensation and/or revenue sharing from USA, based on business development activities. Mr. Holtmeier does not receive economic benefits from sales awards or other prizes. On an ongoing basis, Union Strategic Advisors has a supervisory structure in place to review for potential conflicts of interest.

**Additional Compensation:** There is no additional compensation from third parties in connection with providing investment advisory services that should be disclosed.

**Supervision:** Mr. Holtmeier's activities are supervised by Timothy Recker, Principal at Union Strategic Advisors and Kevin Kim the Chief Compliance Officer. Mr. Recker can be reached at 513-699-5200. We supervise Mr. Holtmeier by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics.

We will monitor the advice given by all investment adviser representatives and their adherence to policies by performing various tests of client accounts as well as ongoing reviews of firm trading activities, client correspondence and other testing. Testing and reviews are overseen by Kevin Kim. Union Strategic Advisors is subject to regulatory oversight by various agencies. These agencies require registration by USA and its Supervised Persons. As a registered entity, USA is subject to examinations by regulators, which may be announced or unannounced. Union Strategic Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

<b>Educational Background</b>	Xavier University, Bachelor of Business Administration, Finance, 1987
<b>Professional Certifications</b>	Accredited Investment Fiduciary <sup>®</sup> - More information on <a href="#">Appendix A</a> Accredited Asset Management Specialist <sup>™</sup> - More information on <a href="#">Appendix A</a> Series 7 – General Securities Representative Examination Series 31 – Futures Managed Funds Examination Series 63 – Uniform Securities Agent State Law Examination Series 65 – Uniform Investment Adviser Law Examination
<b>Business Experience</b>	2026 – Present    Union Strategic Advisors, LLC. Principal & Financial Advisor 2005 – 2026    Raymond James & Associates, Inc. Investment Adviser Representative 2005 – 2026    Raymond James & Associates, Inc. Registered Representative

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

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Recker.***

However, we do encourage you to independently view the background of Mr. Recker on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual **CRD# 2340968.**

**Other Business Activities:** Mr. Recker is a licensed insurance agent and, in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. A conflict of interest exists to the extent that Mr. Recker or other firm personnel may recommend the purchase of insurance products where Mr. Recker receives insurance commissions or other additional compensation. USA seeks to ensure that all recommendations are made in the best interests of clients regardless of any additional compensation earned.

**Additional Compensation:** Mr. Recker has no additional compensation from third parties in connection with providing investment advisory services that should be disclosed other than the activities discussed in the Other Business Activities above.

**Supervision:** Mr. Recker’s activities are supervised by Alex Holtmeier, Principal at Union Strategic Advisors and Kevin Kim the Chief Compliance Officer. Mr. Holtmeier can be reached at 513-699-5200. Mr. Kim can be reached at 513-977-8615. We supervise Mr. Recker by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics.

We will monitor the advice given by all investment adviser representatives and their adherence to policies by performing various tests of client accounts as well as ongoing reviews of firm trading activities, client correspondence and other testing. Testing and reviews are overseen by Kevin Kim. Union Strategic Advisors is subject to regulatory oversight by various agencies. These agencies require registration by USA and its Supervised Persons. As a registered entity, USA is subject to examinations by regulators, which may be announced or unannounced. Union Strategic Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

**Educational Background** Bachelor of Business Administration, The Ohio State University, Finance, 2015

**Professional Certifications** Certified Financial Planner<sup>™</sup> - More information on [Appendix A](#).  
Wealth Management Specialist<sup>™</sup> - More information on [Appendix A](#).  
Accredited Investment Fiduciary<sup>®</sup> - More information on [Appendix A](#).  
Series 7 – General Securities Representative Examination  
Series 66 – Uniform Combined State Law Examination

**Business Experience**

2026 – Present	Union Strategic Advisors, LLC. Financial Advisor
2021 – 2026	Raymond James & Associates, Inc. Investment Advisor Representative
2021 – 2026	Raymond James & Associates, Inc. Registered Representative
2019 – 2021	Mai Capital Management, LLC. Sales Assistant
2015 – 2019	Raymond James & Associates, Inc. Sales Assistant

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

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Holtmeier.**

However, we do encourage you to independently view the background of Mr. Holtmeier on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual **CRD# 5856117**.

**Other Business Activities:** Mr. Holtmeier is a licensed insurance agent and, in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. A conflict of interest exists to the extent that Mr. Holtmeier or other firm personnel may recommend the purchase of insurance products where Mr. Holtmeier receives insurance commissions or other additional compensation. USA seeks to ensure that all recommendations are made in the best interests of clients regardless of any additional compensation earned.

**Additional Compensation:** Mr. Holtmeier has no additional compensation from third parties in connection with providing investment advisory services that should be disclosed other than the activities discussed in the Other Business Activities above.

**Supervision:** Mr. Holtmeier’s activities are supervised by Timothy Recker, Principal at Union Strategic Advisors and Kevin Kim the Chief Compliance Officer. Mr. Recker can be reached at 513-699-5200. We supervise Mr. Holtmeier by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics.

We will monitor the advice given by all investment adviser representatives and their adherence to policies by performing various tests of client accounts as well as ongoing reviews of firm trading activities, client correspondence and other testing. Testing and reviews are overseen by Kevin Kim. Union Strategic Advisors is subject to regulatory oversight by various agencies. These agencies require registration by USA and its Supervised Persons. As a registered entity, USA is subject to examinations by regulators, which may be announced or unannounced. Union Strategic Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Appendix A

### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by CERTIFIED FINANCIAL PLANNER™ Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 87,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP®.

### **CHARTERED RETIREMENT PLANS SPECIALIST (CRPS®)**

The CRPS® Program is specifically targeted at professionals who design, install, and maintain retirement plans for the business community. Continued use of the CRPS® designation is subject to ongoing renewal requirements. Every two years, individuals must renew their right to continue using the CRPS® designation by completing 16 hours of continuing education; reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions; and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

### **ACCREDITED INVESTMENT FIDUCIARY (AIF®)**

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 comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF® Code of Ethics. In order to maintain the AIF® designation, the individual must annually renew their 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 (fi360) company).

### **Accredited Asset Management Specialist, (AAMS®)**

The AAMS® designation from the College of Financial Planning. Individuals who hold the AAMS® designation have completed a course of study encompassing investments, insurance, tax, retirement, and estate planning issues. 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.

### **Wealth Management Specialist<sup>SM</sup> (WMS<sup>SM</sup>)**

The Wealth Management Specialist designation from the College of Financial Planning equips individuals with a substantial overview of the most critical concepts in financial planning and wealth management. Individuals who hold the WMS<sup>SM</sup> have completed courses related to fundamental considerations in the wealth management, insurance, tax, retirement, and estate planning issues. Additionally, individuals are required to complete continuing education courses that are expected to generally help maintain knowledge of current industry trends in the financial market. Designees renew their designation every two years by completing 16 hours of continuing education.