

## Item 1: Cover Page



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### **Form ADV Part 2A – Firm Brochure**

Dated August 25, 2026

This Brochure provides information about the qualifications and business practices of Alta Via Financial Planning LLC, “AVFP”. If you have any questions about the contents of this Brochure, please contact us at (206) 880-1578. 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.

AVFP is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about AVFP is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm’s identification number, 325321.

## Item 2: Material Changes

Since the last annual filing of this ADV Part 2 on 11/07/2025, the following material changes have been made:

- We updated the Professional Designations section for Holly Davis in ADV Part 2B.
- We removed an outside business activity for Holly Davis in ADV Part 2B.
- We have updated our fees in Item 5.

## Item 3: Table of Contents

|                                                                                                |    |
|------------------------------------------------------------------------------------------------|----|
| Item 1: Cover Page                                                                             | 1  |
| Item 2: Material Changes                                                                       | 2  |
| Item 3: Table of Contents                                                                      | 3  |
| Item 4: Advisory Business                                                                      | 4  |
| Item 5: Fees and Compensation                                                                  | 9  |
| Item 6: Performance-Based Fees and Side-By-Side Management                                     | 12 |
| Item 7: Types of Clients                                                                       | 13 |
| Item 8: Methods of Analysis, Investment Strategies and Risk of Loss                            | 14 |
| Item 9: Disciplinary Information                                                               | 18 |
| Item 10: Other Financial Industry Activities and Affiliations                                  | 19 |
| Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading | 20 |
| Item 12: Brokerage Practices                                                                   | 22 |
| Item 13: Review of Accounts                                                                    | 23 |
| Item 14: Client Referrals and Other Compensation                                               | 24 |
| Item 15: Custody                                                                               | 25 |
| Item 16: Investment Discretion                                                                 | 26 |
| Item 17: Voting Client Securities                                                              | 27 |
| Item 18: Financial Information                                                                 | 28 |
| Item 19: Requirements for State-Registered Advisers                                            | 29 |
| Form ADV Part 2B – Brochure Supplement                                                         | 30 |

## Item 4: Advisory Business

### **Description of Advisory Firm**

AVFP is an Investment Adviser principally located in the state of Washington. We are a Limited Liability Company founded in February, 2023. AVFP became registered in July of 2023. Holly Davis is the principal owner and Chief Compliance Officer (“CCO”).

As used in this brochure, the words “AVFP”, “we”, “our firm”, “Advisor” and “us” refer to Alta Via Financial Planning LLC and the words “you”, “your” and “Client” refer to you as either a client or prospective client of our firm.

### **Types of Advisory Services**

AVFP is a fee-only firm, meaning the only compensation we receive is from our Clients for our services. From time to time, AVFP recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. AVFP is not affiliated with nor does AVFP receive any compensation from third-party professionals we may recommend.

### **Financial Planning Services**

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written or electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address some or all of the following areas of concern. The Client and AVFP will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

**Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.

**Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

**College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

**Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

**Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

**Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

**Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

**Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

**Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

**Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").

**Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if

you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Financial Planning Services are offered on a project basis and via an ongoing engagement.

***Ongoing Financial Planning.*** This service involves working one-on-one with a financial planner (“planner”) over an extended period of time, typically at least twelve months to develop and implement a financial plan, however, the client is not obligated to work with the adviser for a specific period of time. By paying an hourly fee clients get to work with a planner who will work with them to develop and implement their plan. Through this ongoing arrangement, Clients are expected to collaborate with the planner to develop and assist in the implementation of their financial plan (the “plan”). The planner will monitor the plan, recommend any appropriate changes and ensure the plan is up-to-date as the Client’s situation, goals, and objectives evolve.

Upon engaging the firm for financial planning, AVFP is responsible for obtaining and analyzing all necessary qualitative and quantitative information from the Client that is essential to understanding the Client’s personal and financial circumstances; helping the Client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client’s current course of action and alternative courses of action to identify required changes that provide the best opportunity for the client to meet their financial goals; developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and ongoing monitoring of the Client’s progress toward the goals and objectives that the recommendations are based around. These components all require in-depth communication with the Client in order for the planner to establish a financial plan and implementation strategy that provides the Client with the most appropriate options in pursuing their established goals and objectives. An Ongoing Financial Planning engagement typically spans a calendar year from the beginning of our engagement. If further Financial Planning is needed, we will sign a new agreement with the Client.

### **Ongoing Financial Planning Process:**

#### *Phase 1: Plan Foundations (6-8 weeks)*

During this onboarding phase we will work together to collect all necessary information in order to draft your Net Worth and Cash Flow. My values exercises and other discovery questions will help me to better understand you and your most important financial and life goals, which I will incorporate into your plan. During the Uncovering Possibilities Meeting we will take an initial look at retirement projections using my collaborative retirement software, RightCapital. As part of that meeting we will also take a look at your current portfolio allocation and begin crafting your investment strategy together.

#### *Phase 2: Ongoing Services (Annual Agreement)*

Once Phase 1 is complete, Ongoing Services will begin with a new, annual agreement via DocuSign. Ongoing Services will begin with the Tailored Plan Meeting, where we will begin diving into detailed recommendations surrounding cash flow, investing and other areas relevant to you and your situation.

### **Scope of Ongoing Services**

#### **Regular Review Meetings:**

- Bi-annual meetings (Spring/Fall) to review your financial plan, discuss progress, and make adjustments as needed.

- Investment Rebalancing: Conduct Fall investment rebalance, and as necessary, to align with your goals and risk tolerance. Includes review and recommendations surrounding equity compensation.
- Goal Tracking: Ongoing tracking of your financial goals (retirement, education, major purchases, etc.) and updates as your circumstances change.
- Cash Flow & Budgeting Support: Assistance with budgeting, cash flow management, and debt reduction strategies.
- Tax Planning: Annual tax review and proactive strategies to minimize tax liabilities. Collaboration with your tax advisor as needed.
- Estate Planning Coordination: Ensure your estate plan remains current and effective. Collaboration with your tax advisor as needed.
- Insurance Review: Periodic review of insurance coverage to ensure adequate protection for you and your family.
- Access to Advisor: Year-round access to your advisor for questions, guidance, and support as needed.

***Project-Based Financial Planning.*** We provide project-based financial planning services on a limited scope, one-time engagement. Project-Based Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from one or more of the above topics to cover or other areas as requested and agreed to by AVFP. For Project-Based Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan.

## **Educational Seminars/Speaking Engagements**

We may provide seminars for groups seeking general advice on investments and other areas of personal finance. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual's need, nor does AVFP provide individualized investment advice to attendees during these seminars. Topics covered during educational seminars will be determined by the Client and AVFP.

## **Client Tailored Services and Client Imposed Restrictions**

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

## **Wrap Fee Programs**

We do not participate in wrap fee programs.

### **Assets Under Management**

As of December 31, 2025, AVFP has \$0 in discretionary and \$0 in non-discretionary assets under management.

## Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior written Client consent.

### **Project-Based Financial Planning**

Project-based financial planning engagements are offered at our hourly rate of \$450.

The fee may be negotiable in some cases and the final agreed upon fee will be outlined in your Advisory Contract. AVFP may request 50% of the fee be collected in advance with the remainder due upon completion of the services. If the service that is provided does not meet the required hourly threshold, the amount due will be reduced according to the service that was completed and any unearned fee will be refunded to the client. AVFP will not bill an amount above \$500 6 months or more in advance of rendering the services. Please note, lower fees for comparable services may be available from other sources. If service is terminated before delivery of the plan, AVFP will deliver the work already done.

As stated above, the fees are based on the typical time frame for each project; the fee may be higher in cases where the adviser determines significantly more time is required for the project. Each time the Adviser charges a fee, the Adviser will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, and the time period covered by the fee. The estimated fee will always be reviewed and agreed to by the client at the start of the engagement at the signing of the agreement. For clients engaged in the Plan Foundations phase of ongoing services, the fee for this service is based on the hourly rate above. The amount of time quoted for each client will be based on complexity, and will be outlined in the client agreement.

In the event significant additional time, beyond the initial estimate, is required to complete a project, AVFP will obtain the client's written consent for additional time and fees throughout the engagement.

### **Ongoing Comprehensive Financial Planning**

After completing an initial project based plan, we charge an annual flat fee for ongoing comprehensive financial planning, based on our hourly fee of \$450. Fees are paid quarterly in arrears, starting at \$6,000 for individuals and \$8,000 for couples. The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. The fees may be negotiable in some cases and the final agreed upon fee will be outlined in your Advisory Contract. Please note, lower fees for comparable services may be available from other sources. If the service that is provided does not meet the required hourly threshold, the amount due will be reduced according to the service that was completed and any unearned fee will be refunded to the client. AVFP will not bill an amount above \$500 6 months or more in advance of rendering the services. If service is terminated before delivery of the plan, AVFP will deliver the work already done.

Once the plan has been delivered to the client, AVFP will continue to monitor the plan and will schedule additional meetings with the client as needed. Follow-up services and meetings will also be tied to our hourly rate of \$450. Payment is due promptly upon receipt of an itemized invoice disclosing the work completed and time spent over the previous quarter. The client will receive an invoice disclosing how the fee was calculated (number of and length

of meetings, any additional financial plan research and documentation, as well as other agreed upon work that was completed following the meeting) and the time period that the fee covers. In the event of termination of any agreement, any prepaid but unearned fee will be prorated and refunded to the client and any completed deliverables of the project will be provided to the Client. The client will be billed for any earned but unpaid fees for work completed up to the date of termination.

### **Educational Seminars/Speaking Engagements**

Seminars and speaking engagements are offered to organizations and the public on a variety of financial topics. Fees range from \$0 to \$2,500 per seminar or \$0 to \$100 per participant, and are negotiable. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. Fees are due at the conclusion of the Seminar. Each time the Adviser charges a fee, the Adviser will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, and the time period covered by the fee. Advisor offers its services in a virtual or in-person setting. Should the event require travel arrangements, both parties must agree to the terms of travel (i.e. cost, distance, hotel arrangements) at the start of the engagement.

### **Fee Payment**

For Financial Planning services and Educational Seminars/Speaking Engagements, fees are paid by electronic funds transfer (EFT) or check. We use an independent third-party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments. If Clients choose to pay their planning fee by Credit Card, we use the payment processor Helcim, which will include an additional 3% payment processing fee per invoice.

### **Other Types of Fees and Expenses**

When implementing an investment recommendation, the Client may incur additional fees such as brokerage commissions, transaction fees, and other related costs and expenses. Clients may incur certain charges imposed by broker-dealers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs. Please refer to Item 12 for additional brokerage information.

Clients may incur fees from third-party professionals such as accountants and attorneys that AVFP may recommend, upon Client request. Such fees are separate and distinct from AVFP's advisory fees.

### **Terminations and Refunds**

For Ongoing Financial Planning services, the Advisory Contract may be terminated with written notice at least 30 calendar days in advance. In the event of early termination prior to the initial plan being delivered, fees will be prorated and any unearned fees will be refunded to the Client. Clients will be responsible for payment of fees up to the date of termination, based on the number of hours already spent on the financial planning.

For Project-Based Financial Planning services, this service is not an ongoing engagement, thus upon receipt of the final fees, the Advisory Contract will be terminated. Clients may terminate at any time by providing written notice. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of the Advisory Contract.

for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based on the number of hours already spent on the financial planning.

For Educational Seminars and Speaking Engagements, Clients may cancel the event with 30 days' advance written notice. Should the Client cancel the event within 30 days of the event (with the exception of weather or similar unforeseen causes), the Client will be responsible for reimbursement of any non-refundable travel expenses already incurred and a prorated fee for any work conducted in preparation of the event, based on the percentage of work done and the flat fee agreed upon by both parties. Should any fees collected in advance exceed the amount of work conducted, the Advisor will provide a prorated refund within 30 days from the notice of termination.

### **Sale of Securities or Other Investment Products**

Advisor and its supervised persons do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

## Item 7: Types of Clients

We provide financial planning services to individuals, and high net-worth individuals.

We do not have a minimum account size requirement.

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

Below is a brief description of our methods of investment analysis and primary recommended investment strategies that we utilize in our research and recommendations when preparing and delivering financial plans and advice to clients.

**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Charting analysis** involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Mutual Fund and/or ETF Analysis:** We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There

is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

## **Investment Strategies**

### **Modern Portfolio Theory**

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

### **Passive Investment Management**

We primarily practice passive investment management. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

### **Material Risks Involved**

AVFP does not provide investment management, however investment recommendations may be made as part of the financial planning services. **All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Options and other derivatives** carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

**Exchange Traded Funds** Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value and an ETF purchased at a premium may ultimately be sold at a discount; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**Mutual Funds:** When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

AVFP and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

AVFP and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

AVFP and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of AVFP or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

### **Broker-Dealer Affiliation**

No AVFP employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

### **Other Affiliations**

No AVFP employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

### **Related Persons**

Neither AVFP or its management persons have any relationship or arrangement with any related parties.

### **Recommendations or Selections of Other Investment Advisers**

AVFP does not recommend Clients to Outside Managers to manage their accounts.

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

As a fiduciary, our firm and its associates owe the client a fiduciary duty to put the client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### **Code of Ethics Description**

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matters shall reflect the credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

From time to time, our firm and/or related persons may invest in the same securities that we recommend to Clients. However, we do not place trades on behalf of our clients. Thus, we have no control over which securities clients buy or sell as it's the Client's ultimate responsibility. Investment advice to Clients is always made in light of the Client's objectives and Advisor and its personnel are prohibited from making recommendations that are for personal gain or not in the best interests of Clients.

### **Trading Securities At/Around the Same Time as Client's Securities**

Neither our firm or its related persons buys or sells securities for client accounts at or about the same time that we or a related person buys or sells the same securities for our own accounts.

## Item 12: Brokerage Practices

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

AVFP does not recommend specific custodians to clients.

#### **1. Research and Other Soft-Dollar Benefits**

We do not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client.

#### **2. Brokerage for Client Referrals**

We receive no referrals from a custodian, broker-dealer, or third party in exchange for using that custodian, broker-dealer, or third party.

#### **3. Clients Directing Which Broker/Dealer/Custodian to Use**

As a fee-only financial planner who does not offer Investment Management Services, we do not have a concern over which custodians a Client may choose in order to implement our investment recommendations.

#### **Aggregating (Block) Trading for Multiple Client Accounts**

Some investment advisers execute Client accounts on an aggregated basis as a way to lower expenses. As a fee-only financial planner who does not offer Investment Management Services, we do not execute trades on behalf of Clients. As a result, it is up to the Client to negotiate their own trading costs with their custodian.

## Item 13: Review of Accounts

### **Periodic Reviews**

Holly Davis, President and CCO of Alta Via Financial Planning LLC, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. AVFP does not provide specific reports to financial planning Clients, other than financial plans. We will meet with clients on at least a semi-annual basis to monitor the client's progress on implementing our recommendations.

### **Triggers of Reviews**

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

### **Review Reports**

Clients will receive trade confirmations from the custodian(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

## Item 14: Client Referrals and Other Compensation

### **Compensation Received by AVFP**

AVFP is a fee-only firm that is compensated solely by its Clients. AVFP does not receive commissions or other sales-related compensation. Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

### **Client Referrals from Solicitors**

AVFP does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

## Item 15: Custody

AVFP does not accept custody of Client funds.

## Item 16: Investment Discretion

We do not provide Investment Management Services, and therefore do not exercise discretion.

## Item 17: Voting Client Securities

AVFP does not provide Investment Management Services, and therefore does not vote Client proxies.

## Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$500 in fees six months or more in advance.

## Item 19: Requirements for State-Registered Advisers

### **Principal Officers**

Holly Davis serves as AVFP's sole principal and CCO. Information about Holly Davis's education, business background, and outside business activities can be found on her ADV Part 2B, Brochure Supplement attached to this Brochure.

### **Outside Business**

All outside business information, if applicable, of AVFP is disclosed in Item 10 of this Brochure.

### **Performance-Based Fees**

Neither AVFP nor Holly Davis is compensated by performance-based fees.

### **Material Disciplinary Disclosures**

No management person at AVFP has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### **Material Relationships That Management Persons Have With Issuers of Securities**

Neither AVFP nor Holly Davis have any relationship or arrangement with issuers of securities.



## Alta Via Financial Planning LLC

Mailing Address:  
4616 25<sup>th</sup> Ave NE, #307  
Seattle, Washington 98105  
altaviafp.com

(206) 880-1578

Dated March 3, 2026

### Form ADV Part 2B – Brochure Supplement

*For*

**Holly Davis 6566082**

**President and Chief Compliance Officer**

This brochure supplement provides information about Holly Davis that supplements the Alta Via Financial Planning LLC (“AVFP”) brochure. A copy of that brochure precedes this supplement. Please contact Holly Davis if the AVFP brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Holly Davis is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6566082.

## Item 2: Educational Background and Business Experience

### Holly Davis

Born: 1974

#### Educational Background

- 1997 – Bachelor Of Arts, Business Administration, University of Washington

#### Business Experience

- 02/2023 – Present, Alta Via Financial Planning LLC, President and CCO
- 02/2021 – 12/2022, 603 Financial, Inc. dba Arrivity Financial Planning, Financial Planner/Investment Advisor Representative
- 07/2017 – 02/2021, 603 Financial, Inc. dba Goddard Financial Planning, Financial Planner/Investment Advisor Representative
- 01/2016 – 07/2017, Blue Canoe Financial Planning, Inc., Financial Planner/Investment Advisor Representative
- 09/2015 – 1/2016, Blue Canoe Financial Planning, Inc. dba Goddard Financial Planning, Financial Planner/Investment Advisor Representative
- 05/2014 – 09/2015, Blue Canoe Financial Planning, Inc dba Goddard Financial Planning, Paraplanner
- 09/2011 – 05/2014, RealNetworks, Inc., Accounting Manager

#### Professional Designations, Licensing & Exams

**CFP (Certified Financial Planner)®:** 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 71,000 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® certification.

**Certified Public Accountant (CPA):** CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services.

### Item 3: Disciplinary Information

Holly Davis has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### Item 4: Other Business Activities

Holly Davis is not involved with outside business activities.

### Item 5: Additional Compensation

Holly Davis does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through AVFP.

## Item 6: Supervision

Holly Davis, as President and Chief Compliance Officer of AVFP, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

Holly Davis has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.