Part 2 of Form ADV: ***Firm Brochure***

# Whitcomb & Hess, Inc.

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February 25, 2026

This brochure provides information about the qualifications and business practices of Whitcomb & Hess. If you have any questions about the contents of this brochure, please contact our service team at 419-289-7007 or info@whitcomb.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Whitcomb & Hess is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 121064.

## Item 2 Material Changes

Form ADV Part 2 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, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated February 27, 2025, we do not have any material change to report.

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## Item 4 Advisory Business

Whitcomb & Hess, Inc. ("Whitcomb & Hess") was founded in 1983 by the late Edward L. Whitcomb and James H. Hess. Whitcomb & Hess is located in Ashland, Ohio.

Whitcomb & Hess is a Certified Public Accounting (CPA) and investment advisory firm, whose primary business is providing tax, accounting, and management services to individuals and corporations. In addition to this practice, Whitcomb & Hess provides investment advisory and portfolio management services, and consulting services.

Whitcomb & Hess is a registered investment advisor (RIA) with the Securities and Exchange Commission (SEC) and is notice filed in states where such filings are required. Whitcomb & Hess is also an Ohio licensed insurance agency.

Whitcomb & Hess offers the following advisory services to our clients:

*INVESTMENT ADVISORY SERVICES*
*INDIVIDUAL PORTFOLIO MANAGEMENT*

Our firm provides continuous advice to clients regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background. We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Although our investment advice is offered concerning predominantly **exchange-listed securities**, we may also recommend:

- Certificates of deposit
- Municipal securities
- Securities traded over-the-counter
- Variable annuities
- No-load and institutional mutual funds
- Foreign issuers
- Corporate debt securities (other than commercial paper)
- Commercial paper
- United States governmental securities

Because some types of investments involve certain additional degrees of risk they will only be recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

*AMOUNT OF MANAGED ASSETS*

As of **February 9, 2026**, we provide continuous management services for **$433,488,072** in client assets on a discretionary basis, and **$57,211,818** in client assets on a non-discretionary basis.

*PENSION CONSULTING SERVICES*

Our Pension Consulting Services are comprised of three distinct services. Clients may choose to use any or all of these services.

*Selection of Investment Vehicles:*

We assist plan sponsors in constructing appropriate asset allocation models. We will then review various mutual funds (both index and managed) to determine which investments are appropriate. The number of investments to be recommended will be determined by the client.

*Monitoring of Investment Performance:*

We monitor client investments continually. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

*Employee Communications:*

For pension, profit sharing, and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide annual educational support and investment workshops designed for the plan participants. The nature of the topics to be covered will be determined by us and the client under the guidelines established in the Employee Retirement Income and Securities Act ("ERISA") Section 404(c). The educational support and investment workshops will NOT provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

*AMOUNT OF ASSETS IN 401(K) PLANS FOR WHICH WE PROVIDE CONSULTING SERVICES*

As of **February 9, 2026,** we were providing pension consulting services to fourteen (14) 401(k) plans with assets totaling approximately **$35,751,092.** These assets are included in our non-discretionary assets under management calculation noted above.

*FINANCIAL PLANNING*

In accordance with requirements by the Certified Financial Planner Board of Standards, we have a fiduciary duty to place the interests of the Client above the interests of us as the Advisor, including operating with the highest regard to professionalism, integrity, competence, and diligence. We are also required to avoid conflicts of interest, or fully disclose material conflicts of interest to the Client.

The financial planning process includes: understanding the client's personal and financial circumstances, identifying and selecting goals, analyzing the client's course(s) of action, developing and presenting the financial planning recommendations, implementing those recommendations, and monitoring and updating the financial planning progress.

As part of our financial planning service, we offer modular and broad-based planning. Our modular planning services are tailored for clients requiring advice on a single aspect(s) of their finances. For clients requiring board-based planning services, we provide a comprehensive evaluation of the client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service typically receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- PERSONAL: We review family records, budgeting, personal liability, estate information, college planning, and other financial goals.
- TAX AND CASH FLOW: We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- INVESTMENTS: We analyze investment alternatives and their effect on the client's portfolio.
- INSURANCE: We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- RETIREMENT: We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- DEATH AND DISABILITY: We review the client's cash needs at death, income needs of surviving dependents, estate planning, and disability income.
- ESTATE: We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, powers of attorney, and asset protection plans. In addition we will assess nursing home costs, Medicaid, elder law, and estate taxes.

We gather required information through in-depth personal interviews. Information gathered may include the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

**Rollover Recommendations**

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

## Item 5 Fees and Compensation

*PORTFOLIO MANAGEMENT / PENSION CONSULTING FEES*

As detailed in the Investment Advisory Agreement, portfolio management and investment advisory services are provided for a percentage of assets under management.

Whitcomb & Hess does not receive any performance-based compensation. Fees are not based on capital appreciation. Fees are not negotiable.

Fees are calculated and billed each quarter in advance, based on the fair market value of assets at the end of the prior quarter. Fees will be automatically withdrawn from your account on or about the first business day of each quarter, unless other payment arrangements are made in advance. Payment of management fees will be made by the qualified custodian holding the funds and securities, provided that you supply written authorization permitting the fees to be paid directly from the account. Whitcomb & Hess will not have access to funds for payment of fees without your written consent.

Further, the qualified custodian agrees to deliver account statements, at least quarterly, directly to you, showing all disbursements from the account. You are encouraged to review all account statements for accuracy. Whitcomb & Hess will receive a duplicate copy of the statement that was delivered to you.

Percentages used for fee calculations are as follows:

**Portfolio Management Fees**
(*Individuals and Organizations*)

| Assets Under Management | Annual Fee |
|---|---|
| $0 - $499,999 | 1.00%* |
| $500,000 - $999,999 | 0.80% |
| $1,000,000 - $1,999,999 | 0.60% |
| $2,000,000 - $2,999,999 | 0.40% |
| $3,000,000 - $4,999,999 | 0.30% |
| $5,000,000 + | 0.20% |

**Pension Consulting Fees**

| Assets Under Management | Annual Fee |
|---|---|
| $0 - $999,999 | 0.75% |
| $1,000,000 - $1,999,999 | 0.50% |
| $2,000,000 - $4,999,999 | 0.30% |
| $5,000,000 + | 0.20% |

*With a minimum fee of $25 per quarter (Individuals and Organizations only)

*FINANCIAL PLANNING FEES*

Whitcomb & Hess' Financial Planning fee will be determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client. Our Financial Planning fees are calculated and charged on a fixed fee basis, typically ranging from $250 to $2,500, depending on the specific arrangement reached with the client. We may request a 50% retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed $500 for work that will not be completed within six months. The balance is due upon completion of the plan.

Fees to update the plan are 30% of initial plan price for annual updates, and 45% of initial plan price for bi-annual updates. Fees for a comprehensive financial plan and each updated plan shall be payable as follows: a 50% down payment is due at signing of this agreement (or when a review and update of the plan is due), and the remaining 50% is due upon delivery of the plan (or the updated plan).

*GENERAL INFORMATION*

*Termination of the Advisory Relationship:* A client agreement may be canceled at any time, by either party, for any reason upon written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees over $25.00 will be promptly refunded. Refunds under $25.00 will be made upon client request. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

*Mutual Fund Fees*: All fees paid to Whitcomb & Hess for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

*Wrap Fee Programs and Separately Managed Account Fees*: Whitcomb & Hess does not participate in Wrap Fee Programs or Separately Managed Accounts.

*Additional Fees and Expenses:* In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

*ERISA Accounts:* Whitcomb & Hess is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to ERISA. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Whitcomb & Hess may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees.

To the extent we perform any Fiduciary Services, our firm is acting as a fiduciary of the Plan as defined in Section 3(21) under the Employee Retirement Income Security Act ("ERISA").

*Advisory Fees in General:* Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

*Limited Prepayment of Fees:* Under no circumstances do we require or solicit payment of fees in excess of $1,200 more than six months in advance of services rendered.

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

Whitcomb & Hess does not charge performance-based fees.

## Item 7 Types of Clients

Whitcomb & Hess is a CPA and investment advisory firm, whose principal business is providing tax, accounting, and management services to individuals and corporations. In addition to this practice, Whitcomb & Hess provides investment advisory and portfolio management services to individuals, corporations, trusts, estates, charitable organizations, and consulting services to participant directed qualified retirement plans. Whitcomb & Hess is also an insurance agency and offers financial planning services.

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

*METHODS OF ANALYSIS*

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

*Fundamental Analysis.* We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

*Technical Analysis.* We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.
Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

*Risks for all forms of analysis.* Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

*INVESTMENT STRATEGIES*

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

*Long-term purchases.* We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when we believe the securities to be currently undervalued, and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

*Short-term purchases.* When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase. A short-term purchase strategy poses risks should the anticipated price swing not materialize. We are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase or potentially taking a loss. In addition, this strategy involves more frequent trading than does a longer-term strategy and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

*Margin transactions.* Upon your request, we can purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash and allows us to purchase stock without selling other holdings.

*RISK OF LOSS*

Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

*TRADE ERROR POLICY*

As a fiduciary, Whitcomb & Hess has the responsibility to effect orders correctly, promptly, and in the best interests of our clients. In the event any error occurs in the handling of any client transactions due to Whitcomb & Hess's actions, or inaction, or actions of others, our policy is to seek to identify and correct any errors as promptly as possible without disadvantaging the client or benefiting Whitcomb & Hess in any way. If an error results in a gain, the gain will remain in your account. If an error results in a loss, Whitcomb & Hess will reimburse you.

## Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

## Item 10 Other Financial Industry Activities and Affiliations

Whitcomb & Hess is also an accounting firm. If you require accounting services, we may recommend that you use our firm. Our advisory services are separate and distinct from the accounting services that our firm may provide.

Whitcomb & Hess is also an insurance agency. Representatives providing investment advice on behalf of our firm may also be licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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

*CODE OF ETHICS*

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by e-mail sent to info@whitcomb.com or by calling us at 419-289-7007.

*PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS*

Whitcomb & Hess does not recommend securities to clients in which we have any financial interest.

Whitcomb & Hess and our personnel owe a duty of loyalty, fairness, and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code. Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement, and record keeping provisions. The Code of Ethics of Whitcomb & Hess further includes a policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information regarding publicly traded securities, all employees are reminded that such information may not be used in a personal or professional capacity.

Whitcomb & Hess and individuals associated with our firm are prohibited from engaging in principal transactions. Whitcomb & Hess and individuals associated with our firm are prohibited from engaging in agency cross transactions. Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

*PERSONAL TRADING*

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts. We may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation. As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
5. We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice who has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.
6. We have established procedures for the maintenance of all required books and records.
7. Clients can decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
8. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
9. We require delivery and acknowledgment of the Code of Ethics by each supervised person of our firm.
10. We have established policies requiring the reporting of Code of Ethics violations to our senior management.
11. Any individual who violates any of the above restrictions may be subject to termination.

## Item 12 Brokerage Practices

As a client of Whitcomb & Hess Investment Advisory Services, you may designate whether you wish to give Whitcomb & Hess discretionary authority to buy or sell securities, or direct the amount of securities to be bought or sold in your accounts under management with Whitcomb & Hess. Your Investment Advisory Agreement with Whitcomb & Hess establishes the amount of authority you are assigning. If you choose not to grant Whitcomb & Hess discretionary authority over your account, or, if you choose to impose certain other restrictions on the management of your account, you should

understand that such restrictions may adversely affect the management of the account or the ability to meet your investment objectives. For example, you may pay a different price for investments due to the delay involved in obtaining your approval for each trade.

Whitcomb & Hess does not require clients to use specific broker-dealers; however, Whitcomb & Hess requests that clients direct us to place trades with the Schwab Institutional division of **Charles Schwab & Co., Inc.** ("Schwab"), a FINRA registered broker-dealer, member SIPC. Whitcomb & Hess has evaluated Schwab and believes that it will provide our clients with a blend of execution services, commission costs and professionalism that will assist our firm to meet our fiduciary obligations to clients. We reserve the right to decline acceptance of any client account for which the client directs the use of a broker other than Schwab if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account.

In directing the use of a particular broker, it should be understood that Whitcomb & Hess will not have authority to negotiate commissions or to necessarily obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to the client and those charged to other clients (who may direct the use of another broker). Clients should note, while Whitcomb & Hess has a reasonable belief that Schwab is able to obtain best execution and competitive prices, our firm will not be independently seeking best execution price capability through other brokers.

The factors considered by Whitcomb & Hess when recommending a broker are the broker's ability to provide professional services, our experience with the broker, the broker's reputation, the broker's quality of execution services and costs of such services, among other factors. Clients are not under any obligation to affect trades through any recommended broker.

We may combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "aggregated trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Each participating account pays an average price per share for all transactions. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically in proportion to the size of each client's order. Accounts owned by our firm or persons associated with our firm may participate in aggregated trading with your accounts; however, they will not be given preferential treatment.

*OUR RELATIONSHIP WITH SCHWAB*

Although we recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Whitcomb & Hess is independently owned and operated and not affiliated with Schwab. Schwab provides Whitcomb & Hess with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets are maintained in accounts at Schwab Institutional. These are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to our firm other products and services that benefit Whitcomb & Hess but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab. Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; provide research, pricing and other market data; (iii) facilitate payment of our fees from clients' accounts; (iv)and assist with back-office functions, record keeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Whitcomb & Hess. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

## Item 13 Review of Accounts

*INVESTMENT ADVISORY SERVICES*
*INDIVIDUAL PORTFOLIO MANAGEMENT*

*REVIEWS:* While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. These accounts are reviewed by one of our Investment Advisor Representatives.

*REPORTS:* In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide quarterly reports summarizing account performance, balances and holdings.

*PENSION CONSULTING SERVICES*

*REVIEWS:* Whitcomb & Hess will review the investment options of the plan at least annually, and whenever the client advises us of a change in circumstances regarding the needs of the plan. These accounts are reviewed by one of our Investment Advisor Representatives.

*REPORTS:* These client accounts will receive reports as contracted for at the inception of the advisory relationship.

*FINANCIAL PLANNING SERVICES*

*REVIEWS:* While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

*REPORTS:* Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

*RESEARCH REPORTS*

Third party performance reporting may not include the net effect of our advisory fees. We encourage clients to review our fee schedule(s) as noted under Item 5 of this disclosure brochure along with any brokerage statements delivered by the acting custodian for more information on the advisory fees deducted from your account(s).

## Item 14 Client Referrals and Other Compensation

The policy of Whitcomb & Hess is not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

## Item 15 Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts. As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement. In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

Aaron Bates, Managing Principal, Teri Yoder, CPA and Ryan Gilmer, CCO and CIO, serve as trustees on certain accounts for which we provide investment advisory services. Their capacity as trustee gives each of them custody over the advisory accounts for which they serve as trustee. These accounts will be held with a bank, broker-dealer, or other independent, qualified custodian. If they act as trustee for any of your advisory accounts, you will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. You should review the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact us directly at the telephone number on the cover page of this brochure.

**Standing Letters of Authorization**
With respect to third party standing letters of authorization ("SLOA"), where a client may grant Whitcomb & Hess the authority to direct custodians to disburse funds to one or more third party accounts, we are deemed to have limited custody. However, we are not required to comply with the surprise examination requirement of the Custody Rule, if we are otherwise in compliance with the seven representations noted in the no-action letter issued by the SEC on February 21, 2017, (the "SEC no-action letter"). Pursuant to Rule 206(4)-2 (the "Custody Rule"), we have taken steps to have controls and oversight in place to support the SEC no-action letter. Where the Adviser acts pursuant to a SLOA, we believe we are making a good faith effort to comply with the representations noted in the SEC's no-action letter. Additionally, since many of those representations involve the qualified custodian's operations, we will collaborate closely with our custodians to ensure that the representations are being met.

Whitcomb & Hess is not directly affiliated with, and does not share common ownership of any other financial institution or custodian, such as a commercial bank, credit union, savings and loan, or any other establishment that conducts financial transactions.

## Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission. Our discretionary authority includes the ability to do the following without contacting the client: Determine the security to buy or sell; and/or, Determine the amount of the security to buy or sell. Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

## Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

## Item 18 Financial Information

Whitcomb & Hess has no additional financial circumstances to report. Under no circumstances do we require or solicit payment of fees in excess of $1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement. Whitcomb & Hess has not been the subject of a bankruptcy petition at any time during the past ten years.

## Item 19 Requirements for State-Registered Advisors

Our firm is registered with the SEC, and not required to respond to this item.

## Item 20 Additional Information

*IRA ROLLOVER CONSIDERATIONS*

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice may present a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
    a. Employer retirement plans generally have a more limited investment menu than IRAs.
    b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
    a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
    b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
    a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax

and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.

9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

**Brochure Supplement**

**Aaron Lee Bates, CFP®**
Investment Advisor Representative

**Whitcomb & Hess, Inc.**
1020 Cleveland Ave.
Ashland, Ohio 44805

**Telephone: 419-289-7007**
**Facsimile: 419-281-7432**

**February 26, 2026**

This brochure supplement provides information about Aaron Lee Bates that supplements the Whitcomb & Hess Firm Brochure. You should have received a copy of that brochure. Please contact our service team at info@whitcomb.com or call 419-289-7007 if you did not receive the Whitcomb & Hess Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Aaron Lee Bates is available on the SEC's website at www.adviserinfo.sec.gov.



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## Item 2 Educational Background and Business Experience

Your Financial Advisor: Aaron Lee Bates

Year of Birth: 1977

Education:

- Ohio State University, BS in Agriculture, 1999

Business Background:

- Whitcomb & Hess, Inc., Investment Advisor Representative, 03/2004 - Present
- Whitcomb & Hess, Inc., Chief Compliance Officer, 05/2011-12/2022
- State Farm VP Management Corp., Registered Representative, 04/2003 - 02/2004
- State Farm Insurance, Agency Intern, 03/2003 - 02/2004
- Agreliant Genetics, Sales Manager, 06/1999 - 03/2003

Certifications & Designations:

Series 6 — Aaron also passed the Investment Company/Variable Contracts Products Limited Representative (Series 6) exam in 2003. The Series 6 exam is administered by the Financial Industry Regulatory Authority (FINRA) (formerly the National Association of Securities Dealers (NASD)), and covers topics on mutual funds, variable annuities, securities and tax regulations, retirement plans, and insurance products.

Aaron is licensed to sell Life, Health, and Property and Casualty insurance in the state of Ohio.

Certified Financial Planner® (CFP®) — Aaron passed the CFP® exam in November of 2008. The program is administered by the Certified Financial Planner Board of Standards Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP certification exam, candidates must also complete qualifying work experience and agree to adhere to the code of ethics of the CFP Board and professional responsibility and financial planning standards. CFP® professionals are required to complete 30 credit hours of continuing education (CE) each reporting period: 2 hours of CFP Board-approved Ethics CE and 28 hours of General CE. www.cfp.net

## Item 3 Disciplinary Information

Aaron Lee Bates has no reportable disciplinary history.

## Item 4 Other Business Activities

Investment-Related Activities

- Mr. Bates has not engaged in any other investment-related activities.
- Mr. Bates does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.
- The Firm does receive commissions due from sales activities related to insurance products.

Non Investment-Related Activities

- Mr. Bates has not engaged in any other business or occupation that provides substantial



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compensation or involves a substantial amount of his time.

## Item 5 Additional Compensation

Mr. Bates does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## Item 6 Supervision

Ryan Gilmer is responsible for supervising the advisory activities of Aaron Bates. You may reach Ryan at 419-289-7007.



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**Brochure Supplement**

**Tracy Lynn Wells**
Investment Advisor Representative

**Whitcomb & Hess, Inc.**
1020 Cleveland Ave.
Ashland, Ohio 44805

**Telephone: 419-289-7007**
**Facsimile: 419-281-7432**

**February 27, 2023**

This brochure supplement provides information about Tracy Lynn Wells that supplements the Whitcomb & Hess Firm Brochure. You should have received a copy of that brochure. Please contact our service team at info@whitcomb.com or call 419-289-7007 if you did not receive the Whitcomb & Hess Firm Brochure or if you have any questions about the contents of this supplement.

Additional information about Tracy Lynn Wells is available on the SEC's website at www.adviserinfo.sec.gov.



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## Item 2 Educational Background and Business Experience

Your Financial Advisor: Tracy Lynn Wells

Year of Birth: 1974

Education:

- Lincoln Christian University, BA in Business Administration; BA in Christian Education, 1997

Business Background

- Whitcomb & Hess, Inc., Investment Advisor Representative, 08/2011 - Present
- Millennial Group, Inc., Client Service Specialist, 03/2008 - 08/2011
- Curves, Circuit Coach, 03/2007 - 12/2010
- State Farm, Jeff Shamp's Office, Life and Health Insurance Specialist, 08/2005 – 09/2007
- Medina Family Chiropractic, Receptionist/X-ray Technician, 09/2004 – 10/2005
- Structure Personnel, Receptionist, 02/2004 – 05/2004
- Northside Christian Church, Director of Children's Ministries, 08/2000 – 03/2004
- Londonderry Christian Church, Office Administrator, 01/1997 – 07/2000

Certifications & Designations:

Series 65 - Tracy passed the National Association of Securities Dealers (NASD) Series 65 Uniform Investment Adviser Law Examination in January 2012. The Series 65 exam covers laws, regulations, ethics, and knowledge on specific investment products.

Tracy is licensed to sell Life, Health, and Property and Casualty Insurance in the state of Ohio.

National Social Security Advisor Certificate Holder (NSSA®) - Issued by National Social Security Association, LLC., Tracy passed the NSSA® exam in July, 2018. The NSSA® Certificate Program is a nationally recognized standard of education and training for competent and ethical Social Security planning. https://www.nationalsocialsecurityassociation.com/

## Item 3 Disciplinary Information

Tracy Lynn Wells has no reportable disciplinary history.

## Item 4 Other Business Activities

Investment-Related Activities

- Ms. Wells has not engaged in any other investment-related activities.
- Ms. Wells does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.
- The Firm does receive commissions due from sales activities related to insurance products.

Non Investment-Related Activities

- Ms. Wells is an Independent Beauty Consultant. She started her home-business in December 1999. Her primary responsibilities are customer service, teaching skin care and training team members.



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## Item 5 Additional Compensation

Ms. Wells does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## Item 6 Supervision

Ryan Gilmer, Chief Compliance Officer, is responsible for supervising the advisory activities of Tracy Wells. Ryan Gilmer can be reached at 419-289-7007.



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**Brochure Supplement**

**Christopher Ryan Nadler, CFP®**
Investment Advisor Representative

**Whitcomb & Hess, Inc.**
1020 Cleveland Avenue
Ashland, OH 44805

**Telephone: 419-289-7007**
**Facsimile: 419-281-7432**

**February 27, 2023**

This brochure supplement provides information about Christopher Ryan Nadler that supplements the Whitcomb & Hess, Inc. brochure. You should have received a copy of that brochure. Contact us at 419-289-7007 if you did not receive Whitcomb & Hess, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher Ryan Nadler is available on the SEC's website at www.adviserinfo.sec.gov.



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## Item 2 Educational Background and Business Experience

Your Financial Advisor: Christopher Ryan Nadler

Year of Birth: 1988

Education:

- Ohio State University, Bachelor of Science in Business Administration - Finance, 2011

Business Background:

- Whitcomb & Hess, Inc., Investment Advisor Representative, 10/2016 - Present
- Richland Bank: Trust Officer/Financial Advisor/Portfolio Manager, 12/2013 - 09/2016
- Edward Jones Investments: Financial Advisor, 06/2011-12/2013
- Enterprise Holdings: Management Trainee Intern, 06/2010-06/2011

Certifications & Designations:

Series 7 – Chris Nadler passed the General Securities Representative Exam (Series 7) in July, 2011. The Series 7 exam is administered by the Financial Industry Regulatory Authority (FINRA) (formerly the National Association of Securities Dealers (NASD)), and covers topics on mutual funds, variable annuities, securities and tax regulations, retirement plans, and insurance products.

Series 66 – Chris Nadler passed the North American Securities Administrators Association (NASAA) Uniform Combined State Law Examination (Series 66) in August, 2011. The Series 66 exam is administered by the Financial Industry Regulatory Authority (FINRA) (formerly the National Association of Securities Dealers (NASD)), and covers topics that have been determined necessary to provide investment advice and effect securities transactions for clients.

Chris also holds a State of Ohio Life and Health Insurance License. He is licensed to sell insurance in the state of Ohio.

Certified Financial Planner® (CFP®) — Chris Nadler passed the CFP® exam in December, 2018. The program is administered by the Certified Financial Planner Board of Standards Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP certification exam, candidates must also complete qualifying work experience and agree to adhere to the code of ethics of the CFP Board and professional responsibility and financial planning standards. CFP® professionals are required to complete 30 credit hours of continuing education (CE) each reporting period: 2 hours of CFP Board-approved Ethics CE and 28 hours of General CE. www.cfp.net

CTFA (Certified Trust and Financial Advisor) - Chris Nadler passed the CTFA exam in July, 2016. Offered by the American Bankers Association for financial professionals, this credential recognizes training and knowledge in taxes, investments, financial planning, trusts and estates.

## Item 3 Disciplinary Information

Chris Nadler has no reportable disciplinary history.



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## Item 4 Other Business Activities

Investment-Related Activities

- Chris Nadler has not engaged in any other investment-related activities.
- Chris Nadler does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.
- The Firm does receive commissions due from sales activities related to insurance products.

Non-Investment-Related Activities

- Chris Nadler has not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## Item 5 Additional Compensation

Chris Nadler does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## Item 6 Supervision

Ryan Gilmer, Chief Compliance Officer, is responsible for supervising the advisory activities of Chris Nadler. Ryan Gilmer can be reached at 419-289-7007.



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**Brochure Supplement**

**Ryan Gilmer, CFA®, CMT®**
Investment Adviser Representative

**Whitcomb & Hess, Inc.**
1020 Cleveland Avenue
Ashland, OH 44805

**Telephone: 419-289-7007**
**Facsimile: 419-281-7432**

February 26, 2026

This brochure supplement provides information about Ryan Gilmer that supplements the Whitcomb & Hess, Inc. brochure. You should have received a copy of that brochure. Contact us at 419-289-7007 if you did not receive Whitcomb & Hess, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Ryan Gilmer is available on the SEC's website at www.adviserinfo.sec.gov.

## Item 2 Educational Background and Business Experience

Your Financial Advisor: Ryan Gilmer

Year of Birth: 1984

Education:

- Ashland University, BS in Business Administration with a major in Finance and a minor in Philosophy, 2006.

Business Background:

- Whitcomb & Hess, Inc., Chief Compliance Officer, 01/2023 - Present
- Whitcomb & Hess, Inc., Chief Investment Officer/IAR, 11/2019 - Present
- Valmark Financial Group, Vice President of Investment Management, 09/2016 - 11/2019
- Whitcomb & Hess, Inc., Investment Adviser Representative, 07/2006 - 09/2016

Certifications:

Series 65 — Ryan passed the National Association of Securities Dealers (NASD) Series 65 Uniform Investment Adviser Law Examination in September 2006. The Series 65 exam covers laws, regulations, ethics, and knowledge on specific investment products.

Chartered Financial Analyst® (CFA®) — Ryan also passed level three of the CFA® exam in June 2012. The Chartered Financial Analyst designation is offered by the CFA institute (formerly the Association for Investment Management Research [AIMR]). Among other requirements, to obtain the CFA charter, candidates must successfully complete three difficult exams and gain at least three (3) years of qualifying work experience. In passing these exams, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management, and security analysis.

Chartered Market Technician® (CMT®) - Ryan also passed three levels of examination for the CMT designation in October 2019. A Chartered Market Technician (CMT) is a professional technical analyst that holds the CMT designation organized by the CMT Association (formerly the MTA), a global credentialing body with nearly 50 years of service to the financial industry. Technical analysis provides the tools to successfully navigate the gap between intrinsic value and market price across all asset classes through a disciplined, systematic approach to market behavior and the law of supply and demand. Earning the CMT demonstrates mastery of a core body of knowledge of investment risk in portfolio management; including quantitative approaches to market research and rules-based trading system design and testing.

## Item 3 Disciplinary Information

Ryan Gilmer has no reportable disciplinary history.

## Item 4 Other Business Activities

Ryan Gilmer is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Chief Compliance Officer and Chief Investment Officer of Whitcomb & Hess, Inc.. Moreover, Mr. Gilmer does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

## Item 5 Additional Compensation

Ryan Gilmer does not receive any additional compensation beyond that received as the Chief Compliance Officer and Chief Investment Officer of Whitcomb & Hess, Inc.

## Item 6 Supervision

Aaron Bates is responsible for supervising the business activities of Ryan Gilmer. You may reach Aaron at 419-289-7007.

**Brochure Supplement**

**Tammy L. Higgins**
Investment Advisor Representative

**Whitcomb & Hess, Inc.**
1020 Cleveland Avenue
Ashland, OH 44805

**Telephone: 419-289-7007**
**Facsimile: 419-281-7432**

**July 31, 2025**

This brochure supplement provides information about Tammy Lynn Higgins that supplements the Whitcomb & Hess, Inc. brochure. You should have received a copy of that brochure. Contact us at 419-289-7007 if you did not receive Whitcomb & Hess, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Tammy Lynn Higgins is available on the SEC's website at www.adviserinfo.sec.gov.



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## Item 2 Educational Background and Business Experience

Your Financial Advisor:  Tammy Lynn Higgins

Year of Birth: 1979

Education:

- Ashland University, BA in Theatre, 2001

Business Background:

- Whitcomb & Hess, Inc., Investment Advisor Representative, 06/2015 - Present
- Home Savings & Loan, Co., Universal Banker, 07/2004-06/2015
- Pier One Imports, Assistant Store Manager, 06/2001-07/2004

Certifications & Designations:

Series 65 – Tammy passed the National Association of Securities Dealers (NASD) Series 65 Uniform Investment Adviser Law Examination in December, 2016. The Series 65 exam covers laws, regulations, ethics, and knowledge on specific investment products.

Tammy is licensed to sell Life and Health insurance in the state of Ohio.

## Item 3 Disciplinary Information

Tammy Lynn Higgins has no reportable disciplinary history.

## Item 4 Other Business Activities

Tammy Lynn Higgins is separately licensed as an independent insurance agent. In this capacity, she can effect transactions in insurance products for her clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Ms. Higgins for insurance related activities. This presents a conflict of interest because Ms. Higgins may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

## Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Ms. Higgins receipt of additional compensation as a result of her other business activities.

Also, refer to the *Fees and Compensation*, *Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Whitcomb & Hess, Inc.'s firm brochure for additional disclosures on this topic.

## Item 6 Supervision

Ryan Gilmer, Chief Compliance Officer, is responsible for supervising the advisory activities of Tammy Higgins. Ryan Gilmer can be reached at 419-289-7007.



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**Brochure Supplement**

**Matthew Tracey Lefelhoc, CFP®**
Investment Advisor Representative

**Whitcomb & Hess, Inc.**
1020 Cleveland Avenue
Ashland, OH 44805

**Telephone: 419-289-7007**
**Facsimile: 419-281-7432**

**March 4, 2025**

This brochure supplement provides information about Matthew Tracey Lefelhoc that supplements the Whitcomb & Hess, Inc. brochure. You should have received a copy of that brochure. Contact us at 419-289-7007 if you did not receive Whitcomb & Hess, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew Tracey Lefelhoc (CRD # 7371067) is available on the SEC's website at www.adviserinfo.sec.gov.

## Item 2 Educational Background and Business Experience

Your Financial Advisor: Matthew Tracey Lefelhoc

Year of Birth: 1999

Education:

- The Ohio State University, BS Finance, 8/2017 - 5/2021

Business Background:

- Whitcomb & Hess, Inc., Investment Adviser Representative, 5/2021 - Present
- Whitcomb & Hess, Inc., Intern, 6/2020 - 5/2021

Certifications & Designations:

Series 65 - Matthew Lefelhoc passed the National Association of Securities Dealers (NASD) Series 65 Uniform Investment Adviser Law Examination in April, 2021. The Series 65 exam covers laws, regulations, ethics, and knowledge on specific investment products.

Certified Financial Planner® (CFP®) — Matthew Lefelhoc passed the CFP® exam in December, 2024. The program is administered by the Certified Financial Planner Board of Standards Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP certification exam, candidates must also complete qualifying work experience and agree to adhere to the code of ethics of the CFP Board and professional responsibility and financial planning standards. CFP® professionals are required to complete 30 credit hours of continuing education (CE) each reporting period: 2 hours of CFP Board-approved Ethics CE and 28 hours of General CE. www.cfp.net

Matthew also holds a State of Ohio Life and Health Insurance License. He is licensed to sell insurance in the State of Ohio.

## Item 3 Disciplinary Information

Matthew Tracey Lefelhoc has no reportable disciplinary history.

## Item 4 Other Business Activities

Matthew Tracey Lefelhoc is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Lefelhoc for insurance related activities. This presents a conflict of interest because Mr. Lefelhoc may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

## Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Lefelhoc's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation*, *Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Whitcomb & Hess, Inc.'s firm brochure for additional disclosures on this topic.

## Item 6 Supervision

Ryan Gilmer, Chief Compliance Officer, is responsible for supervising the advisory activities of Matthew Lefelhoc. Ryan Gilmer can be reached at 419-289-7007.

**Brochure Supplement**

# Jacob Frederick Jones

Investment Advisor Representative

# Whitcomb & Hess, Inc.

1020 Cleveland Avenue
Ashland, OH 44805

**Telephone: 419-289-7007**
**Facsimile: 419-281-7432**

**April 29, 2025**

This brochure supplement provides information about Jacob Frederick Jones that supplements the Whitcomb & Hess, Inc. brochure. You should have received a copy of that brochure. Contact us at 419-289-7007 if you did not receive Whitcomb & Hess, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Jacob Frederick Jones (CRD # 8072906) is available on the SEC's website at www.adviserinfo.sec.gov.

## Item 2 Educational Background and Business Experience

Your Financial Advisor: Jacob Frederick Jones

Year of Birth: 1996

Education:

- Ashland University, BA Finance & Business Management, 8/2015 - 5/2019

Business Background:

- Whitcomb & Hess, Inc., Investment Advisor Representative, 4/2025 - Present
- Spreng - Smith Agency Inc., Insurance Producer, 5/2019 - 4/2025

Jacob also holds a State of Ohio Life and Health Insurance License. He is licensed to sell insurance in the State of Ohio and South Carolina.

## Item 3 Disciplinary Information

Jacob Frederick Jones has no reportable disciplinary history.

## Item 4 Other Business Activities

Jacob Frederick Jones is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Jones for insurance related activities. This presents a conflict of interest because Mr. Jones may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

## Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Jones's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation*, *Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Whitcomb & Hess, Inc.'s firm brochure for additional disclosures on this topic.

## Item 6 Supervision

Ryan Gilmer, Chief Compliance Officer, is responsible for supervising the advisory activities of Jacob Frederick Jones. Ryan Gilmer can be reached at 419-289-7007.

**Brochure Supplement**

# Antonio Rhodes

Investment Advisor Representative

# Whitcomb & Hess, Inc.

1020 Cleveland Avenue
Ashland, OH 44805

**Telephone: 419-289-7007**
**Facsimile: 419-281-7432**

**July 23, 2025**

This brochure supplement provides information about Antonio Rhodes that supplements the Whitcomb & Hess, Inc. brochure. You should have received a copy of that brochure. Contact us at 419-289-7007 if you did not receive Whitcomb & Hess, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Antonio Rhodes (CRD # 8097347) is available on the SEC's website at www.adviserinfo.sec.gov.

## Item 2 Educational Background and Business Experience

Your Financial Advisor: Antonio Rhodes

Year of Birth: 2003

Education:

- Ashland University, BS Finance & Accounting, 8/2021 - 5/2025

*Business Background*:

- Whitcomb & Hess, Inc., Investment Adviser Representative, 5/2025 - Present
- Ashland University, Student, 8/2021 - 5/2025
- Triway High School, Student, 8/2017 - 5/2021

## Item 3 Disciplinary Information

Antonio Rhodes has no reportable disciplinary history.

## Item 4 Other Business Activities

Antonio Rhodes is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Investment Adviser Representative of Whitcomb & Hess, Inc.. Moreover, Mr. Rhodes does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

## Item 5 Additional Compensation

Antonio Rhodes does not receive any additional compensation beyond that received as an Investment Adviser Representative of Whitcomb & Hess, Inc..

## Item 6 Supervision

Ryan Gilmer, Chief Compliance Officer, is responsible for supervising the advisory activities of Antonio Rhodes. Ryan Gilmer can be reached at 419-289-7007.