



Form ADV Part 2A: Firm Brochure

## Item 1: Cover Page

# Foxholm Financial, Inc.

### Doing Business As

Foxholm Financial

### Business Address

2266 Cottage Grove Ave SE  
Atlanta, GA 30317

### Phone

(404) 530-9093

### Email

[contact@foxholm.com](mailto:contact@foxholm.com)

### Website

<https://foxholm.com>

### Date of Brochure

March 15, 2026

*This brochure provides information about the qualifications and business practices of Foxholm Financial, Inc. (doing business as "Foxholm Financial"). If you have any questions about the contents of this brochure, please contact us at (404) 530-9093 or [contact@foxholm.com](mailto:contact@foxholm.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Foxholm Financial has applied for registration as an investment adviser with the State of Georgia. As an investment adviser, we are held to a fiduciary standard, meaning we are legally obligated to act in your best interest. Registration does not imply a certain level of skill or training.*

*Additional information about Foxholm Financial is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Foxholm Financial is 339940.*

## Item 2: Material Changes

This is the initial brochure for Foxholm Financial, Inc. There are no material changes to report.

*[For subsequent annual updates, this section will summarize all material changes since the last annual update, including the date of the previous update.]*

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## Item 4: Advisory Business

### Firm Description and Ownership

Foxholm Financial, Inc. is a Georgia S Corporation doing business as "Foxholm Financial." The firm was incorporated on November 26, 2025 and has applied for registration as an investment adviser with the State of Georgia.

Robert Stowe is the sole owner, President, and Chief Compliance Officer of Foxholm Financial. Mr. Stowe owns 100% of the firm and is the only investment adviser representative providing investment advice to clients.

### Advisory Services Offered

Foxholm Financial provides fee-only, fiduciary investment advisory and financial planning services to individuals, families, and institutions. Our services are designed for Georgia-based professionals, particularly those in STEM (Science, Technology, Engineering, and Mathematics) fields, who value data-driven, systematic approaches to wealth management.

**Advice-Only Service Model:** Foxholm Financial operates as a strictly advice-only firm. We do not manage client assets, execute trades, or maintain custody of client funds. All advice is educational and consultative. Clients retain full control of their accounts and are responsible for implementing recommendations.

We offer the following services:

### Hourly Consulting Services

We provide ad hoc financial consulting services billed at an hourly rate. These services include:

- Portfolio construction and analysis
- Retirement income planning and Social Security optimization
- Tax optimization strategies including Roth conversion analysis
- Investment Policy Statement development

- Equity compensation planning (stock options, Restricted Stock Units (RSUs), Employee Stock Purchase Plans (ESPPs))
- Estate planning coordination
- Custom financial modeling and analysis

Hourly consulting is appropriate for clients with specific questions or projects who do not require ongoing investment management.

### Periodic Investment Consulting (Retainer-Based)

We offer a retainer-based consulting service for clients seeking long-term guidance on portfolio strategy and wealth optimization. This service is consultative in nature and does not involve continuous or regular supervision of client assets.

**Scheduled Reviews:** Reviews are performed solely at specific scheduled intervals (e.g., quarterly or annually) initiated by the Client or the Firm. Between these scheduled reviews, the Firm does not monitor client accounts, market activity, or specific securities.

**Client Responsibility:** The Client retains sole responsibility for implementing all recommendations and for monitoring their accounts between scheduled consultations.

**No Asset Management:** Foxholm Financial does not have discretionary authority and does not execute trades. We report \$0 in Regulatory Assets Under Management (RAUM) because our services are advice-only and do not meet the regulatory definition of "continuous and regular supervisory or management services."

These services are designed for clients with investable assets who want professional guidance on growing, maintaining, and optimizing their wealth. Additional consulting beyond the scope of scheduled reviews is billed separately at hourly rates.

### Advice-Only Model

Foxholm Financial operates as an advice-only firm. This means:

- Clients retain full control of their accounts at their chosen custodian
- All investment decisions and trade execution are the client's responsibility
- We provide recommendations and guidance; clients implement

#### How We Assist Clients:

- **"Over-the-Shoulder" Guidance:** Via screen sharing (Google Meet), clients log into their own accounts while we provide verbal guidance on where to click and what to type. We never see passwords and strictly refrain from utilizing "remote control" features to execute actions on the client's device.
- **View-Only Access:** Clients may grant us "Third-Party View" or "Inquiry Access" through their custodian (Fidelity, Schwab, Vanguard, etc.). This allows us to see account balances and download statements for planning purposes, but prevents us from moving money or executing trades.
- **Secure Document Sharing:** Clients can share statements, reports, and other documents from their brokerages through our secure client portal for review and analysis.

### Annuity Educational Consulting

Foxholm Financial provides educational consulting on annuity products, including:

- Analysis of annuity suitability for your situation
- Comparison of annuity options vs. other retirement income strategies
- Referral to licensed insurance professionals if you decide to proceed

Educational annuity consulting is billed at hourly rates.

### Client Newsletters and Educational Content

Foxholm Financial publishes periodic newsletters and educational content for clients. These publications provide general market commentary, investment education, and updates on financial planning topics relevant to our client base. Newsletters are delivered via email and are included as part of our advisory relationship at no additional charge. Newsletter content is educational in nature and does not constitute personalized investment advice.

Foxholm Financial publishes educational content on quantitative investing on its website ([foxholm.com/q](http://foxholm.com/q)). These pages cover investment methodology, signal construction, factor logic, and risk architecture as educational material for clients and prospective clients. This content explores analytical frameworks that inform the firm's advisory approach. Content is restricted to methodology discussion; no hypothetical or backtested performance metrics are published. These pages are educational content and do not constitute personalized investment advice.

### Educational Seminars and Workshops

Foxholm Financial may conduct educational seminars and workshops on financial planning and investment topics. These events are designed to educate participants on general wealth management principles and strategies. Seminar content is educational in nature and does not constitute personalized investment advice. Specific consulting engagements following seminars are billed at our standard hourly rates.

### Tailoring Advisory Services

We tailor our advisory services to the individual needs of each client. During the initial consultation and discovery process, we gather information about the client's financial situation, investment experience, goals, risk tolerance, and any restrictions or preferences.

We customize our analysis and recommendations based on the client's specific circumstances and questions. Since we operate as an advice-only firm, clients retain full control over implementation of recommendations.

## Wrap Fee Programs

Foxholm Financial does not participate in or sponsor any wrap fee programs.

## Assets Under Management

Foxholm Financial operates as an advice-only firm and does not manage client assets.

- Discretionary Assets: \$0
- Non-Discretionary Assets: \$0
- **Total Regulatory Assets Under Management: \$0**

*Foxholm Financial does not offer investment management services or maintain custody of client assets.*

## Item 5: Fees and Compensation

Foxholm Financial is compensated solely through fees paid directly by clients. We do not receive commissions, 12b-1 fees, or other transaction-based compensation. This fee-only compensation structure supports our fiduciary duty by eliminating conflicts of interest that arise from commission-based compensation.

Foxholm Financial operates on a strict fee-for-service model. We do not charge Assets Under Management (AUM) fees and we do not accept commissions. All services are billed in 15-minute increments at a rate of **\$300 per hour**.

### The Strategic Portfolio Review (Flat Bundle)

**Fee:** \$900 (3 Hours)

This engagement is designed for clients who need a professional structural foundation for their wealth but prefer to implement trades themselves. It focuses on creating a governing document for your financial life.

#### Deliverables:

- **Investment Policy Statement (IPS):** A customized document defining your target asset allocation, rebalancing protocols, and specific account strategies (e.g., "Asset Location" strategy placing bonds in IRAs and stocks in Brokerage).
- **Portfolio Cost & Risk Analysis:** A review of your current holdings to identify high expense ratios, overlap/redundancy, and uncompensated risk.
- **Contribution Strategy:** A clear "Order of Operations" for where your next dollar of savings should go (e.g., 401k Match → Roth IRA → 529).
- **Live Strategy Meeting:** A 60-minute virtual meeting to review the IPS and answer questions.

#### Time Allocation (3 Hours Total):

- 2 Hours: Advisor analysis, drafting the IPS, and running portfolio diagnostics.
- 1 Hour: Live presentation and strategy meeting.

#### Scope Limits:

- Maximum 30 securities across up to 6 accounts
- Portfolios exceeding these limits require additional hourly billing at \$300/hour

### Periodic Investment Consulting (Retainer-Based)

**Fee:** \$300 per review (1 Hour)

A retainer-based consulting service for clients seeking long-term guidance on portfolio strategy and wealth optimization. This service is consultative in nature and does not involve continuous or regular supervision of client assets.

**Initial Engagement:** We deliver a comprehensive Investment Policy Statement (via Strategic Portfolio Review above) and establish the framework for periodic portfolio consultations.

**Scheduled Reviews:** Clients may schedule quarterly, semi-annual, or annual reviews to assess:

- Portfolio performance and rebalancing opportunities
- Tax-loss harvesting and asset location adjustments

- Strategic adjustments based on changing market conditions or life circumstances
- Open enrollment benefit decisions
- End-of-year tax planning

**Structure:**

- **30 Minutes (Async):** Client uploads current statements or specific questions 48 hours in advance. Adviser reviews the data, prepares notes, and runs necessary calculations.
- **30 Minutes (Live):** A focused video consultation to deliver findings and answer questions.

Between scheduled reviews, the Firm does not monitor client accounts. Clients retain sole responsibility for implementing recommendations and for monitoring their accounts between consultations.

## Focused Portfolio Review

**Fee:** \$300 (1 Hour)

A focused review of your current holdings with in-depth feedback on what you own today.

**What's Included:**

- Analysis of your current portfolio for expense ratios, overlap/redundancy, and risk exposure
- Assessment of asset allocation and diversification
- Identification of potential concerns or opportunities within your existing holdings

**What's NOT Included:**

- Roth conversion strategies or account restructuring plans
- Investment Policy Statement or written plan documents

**Scope Limits:**

- Maximum 20 securities across up to 4 accounts
- Portfolios exceeding these limits require additional hourly billing

**Deliverable:** Written summary or 15-minute video call to discuss findings (client's choice).

**How It Works:**

1. Client uploads current portfolio holdings 48 hours in advance
2. Adviser reviews and analyzes holdings (45 minutes)
3. Adviser delivers findings via email summary or brief video call (15 minutes)

## Hourly Consulting (Project-Based)

**Rate:** \$300/hour

For specific financial planning topics outside the scope of a portfolio review, clients may book consulting time. All engagements are billed in 15-minute increments.

**Specific Hourly Options:**

- **Equity Compensation Strategy:** Analysis of RSUs, Incentive Stock Options (ISOs), and ESPPs. Modeling tax implications of vesting vs. selling. Typical scope: 1-2 Hours.
- **Retirement Readiness Modeling:** Social Security claiming strategies. Roth Conversion analysis and "tax bracket filling" strategies. Typical scope: 2-3 Hours.
- **College Funding Analysis:** 529 funding projections and Superfunding strategies. Cash flow modeling for tuition payments. Typical scope: 1-2 Hours.
- **General Financial Consulting:** Any other financial topic requiring fiduciary review. Billed strictly by the hour.

## Payment Terms

**Payment Timing:** All fees are due in advance before services are rendered.

- Strategic Portfolio Review (\$900): Due before the engagement begins.
- Periodic Investment Consulting (\$300): Due before the scheduled review.
- Focused Portfolio Review (\$300): Due before the engagement begins.
- Hourly Consulting (\$300/hour): Due before the scheduled session.

**Prepayment Limits:** Foxholm Financial does not collect fees of \$500 or more six months or more in advance.

**120-Day Engagement Limit (Sunset Clause):** To ensure compliance with regulatory requirements regarding prepaid fees, all project-based engagements (including the Strategic Portfolio Review) must be completed within 120 days of the effective date of the agreement. If services are not completed within this timeframe due to Client delays, the engagement will automatically conclude. Any fees paid for work not yet performed will be refunded to the Client, and the agreement will be terminated. This policy ensures that Foxholm Financial never retains prepaid fees of more than \$500 for six months or more in advance.

**Billing Increments:** All work is billed in 15-minute increments.

**Termination:** Clients may terminate their engagement at any time. Refunds for unused prepaid fees are calculated at \$300 per hour for work not yet performed. For bundled services (e.g., Strategic Portfolio Review), the refund equals the total fee paid minus \$300 for each hour of work completed. Refunds are processed within 14 business days of termination.

## Fee Collection

All fees are collected via our third-party payment processor (AdvicePay). Clients pay invoices directly. We never access or deduct from investment accounts.

## Other Costs and Expenses

Since Foxholm Financial operates as an advice-only firm, clients retain their own custodian relationships and are responsible for costs associated with their accounts.

### Client Custodian Costs (At Your Chosen Custodian):

- Account maintenance fees (varies by custodian; many brokers waive these)
- Wire transfer fees for outgoing wires
- Transaction costs for trades you execute

### Investment Expenses (Incurred Regardless of Advisory Relationship):

- Mutual funds and exchange-traded funds (ETFs) charge internal management fees and expenses (expense ratios)
- These fees are disclosed in each fund's prospectus
- We generally recommend low-cost index funds and ETFs to minimize these expenses

### Payment Processing Fees:

- All fees are collected via AdvicePay, our third-party payment processor
- Credit card and ACH processing fees are included in our quoted fees (not charged separately to clients)

*Note: Foxholm Financial does not have a custodian relationship and does not execute trades on behalf of clients. Clients are responsible for all costs at their chosen custodian.*

## Prepayment of Fees

Foxholm Financial does not collect fees of \$500 or more from any client six months or more in advance. Accordingly, we are not required to provide an audited balance sheet.

## Compensation for Sales of Securities

Neither Foxholm Financial nor any of its supervised persons receive 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

Foxholm Financial does not charge performance-based fees (fees based on a share of capital gains or capital appreciation of client assets). All of our fees are calculated as described in Item 5.

## Item 7: Types of Clients

Foxholm Financial provides advisory services to the following types of clients:

- Individuals
- Families
- Institutions (including trusts)

Our services are designed primarily for Georgia-based STEM professionals who value data-driven, systematic approaches to wealth management. We evaluate each prospective client individually based on their specific circumstances and needs.

## Account Minimums

### Advice-Only Services:

- No minimum asset requirement
- Minimum engagement: 1 hour of consulting time

Since we operate as an advice-only firm and do not manage client assets, there is no account size minimum.

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

### Investment Research and Governance

As a sole-practitioner firm, Robert Stowe is responsible for all investment research, analysis, and recommendation decisions. Mr. Stowe conducts quarterly investment reviews that assess capital market expectations, risk factors, and security selection criteria. All significant investment decisions are documented through this internal research process.

### Financial Planning Software and Tools

Foxholm Financial utilizes MaxiFi PRO, a professional financial planning application, for comprehensive financial planning projections and scenario analysis. The Firm also utilizes proprietary analysis tools developed in-house for specific niche planning areas, including Fixed Income (Bond) allocation, Equity Compensation (Stock Options) analysis, and RMD calculations. While these proprietary tools allow for greater customization, they present "Model Risk" (the risk of coding errors or incorrect logic). The Firm mitigates this risk by regularly validating proprietary tool outputs against known standards and manual calculations.

### Investment Philosophy

The Firm's investment philosophy is grounded in evidence-based principles:

**Cost Minimization:** Every dollar paid in investment fees is a dollar that doesn't compound over time. The Firm prioritizes ultra-low-cost index funds and ETFs as core portfolio holdings.

**Passive Investing:** In efficient markets like U.S. large-cap stocks, active management faces structural cost disadvantages that make consistent outperformance statistically improbable. The Firm defaults to passive index strategies for core equity and fixed-income allocations.

**Broad Diversification:** The Firm recommends portfolios diversified across asset classes, market segments, and geographies, reducing dependence on any single investment, sector, or economy.

**Asset Location:** Tax efficiency requires placing tax-inefficient assets in tax-advantaged accounts and tax-efficient assets in taxable accounts.

**Behavioral Discipline:** The Firm's advice emphasizes staying invested through market cycles rather than market timing.

### Methods of Analysis

Foxholm Financial employs systematic, evidence-based methods of analysis:

**Concentrated Position Analysis:** For clients holding significant individual security exposure (typically through employer stock, RSUs, or options), we utilize fundamental analysis to evaluate the risks of holding versus diversifying. This includes assessing the issuer's financial health, valuation relative to historical norms, and correlation with the client's broader portfolio.

**Fixed Income Analysis:** For income securities, the Firm emphasizes credit quality (investment-grade securities for core holdings), duration management matched to client time horizons, tax efficiency through tax-equivalent yield calculations, and fee minimization.

**Quantitative Analysis:** The Firm utilizes systematic, rules-based frameworks to inform portfolio construction and evaluate risk. Specific methodologies include multi-factor screening (e.g., value, quality, and momentum), sector rotation models, and statistical mean reversion analysis. To assess portfolio resilience, we employ advanced risk modeling techniques such as Value-at-Risk (VaR), maximum drawdown analysis, and Monte Carlo simulations. The Firm also utilizes historical backtesting strictly as an internal research tool to validate strategy robustness; we do not publish or advertise backtested performance results.

**Fundamental Analysis:** We consider fundamental factors including valuations, economic conditions, interest rates, and corporate earnings when appropriate to our investment strategies.

### Investment Strategies

Our investment approach emphasizes systematic, rules-based strategies designed to achieve client objectives while managing risk:

**Strategic Guidance Framework:** The Firm develops strategic guidance for portfolio construction based on three dimensions: goal type (Income Focus, Total Return, Growth Focus, Capital Preservation), time horizon (Near-Term, Mid-Term, Long-Term), and risk profile (Conservative, Moderately Conservative, Moderate, Moderately Aggressive, Aggressive). This framework provides guidance on appropriate investment approaches rather than prescriptive allocations.

**Risk Management:** Capital preservation is a priority. We incorporate diversification and other risk management techniques into portfolio construction and advice.

**Tax Efficiency:** We consider the tax implications of investment decisions and seek to maximize after-tax returns through strategies such as tax-loss harvesting, asset location, and long-term capital gains treatment where appropriate.

**Cost Consciousness:** We generally recommend low-cost investment vehicles such as index ETFs to minimize the drag of expenses on long-term returns.

## Prohibited Investments

The Firm does not recommend the following investment types: cryptocurrencies and digital assets, private placements and Reg D offerings, penny stocks, complex derivatives, leveraged and inverse ETFs (held long-term), annuities with excessive surrender charges, and non-traded REITs. If a client specifically requests analysis of a prohibited category, the Firm will provide a thorough analysis of the investment's pros and cons to help the client make an informed decision, but will not make a specific recommendation to invest.

## Risk of Loss

**Investing in securities involves risk of loss that clients should be prepared to bear.**

All investments carry risk, and there is no guarantee that our investment strategies will achieve their objectives or that clients will not experience losses. Clients should be prepared to bear investment losses, including the potential loss of their entire investment.

The following are among the material risks associated with our investment strategies:

**Market Risk:** The value of investments may decline due to general market conditions, economic factors, political events, or other factors affecting securities markets as a whole.

**Interest Rate Risk:** Changes in interest rates can affect the value of fixed-income securities. Generally, when interest rates rise, bond prices fall, and vice versa.

**Credit Risk:** Fixed-income securities are subject to the risk that issuers may fail to make timely payments of principal and interest.

**Inflation Risk:** The purchasing power of investment returns may be eroded by inflation over time.

**Concentration Risk:** Portfolios concentrated in particular sectors, asset classes, or securities may experience greater volatility and risk of loss.

**Liquidity Risk:** Some investments may be difficult to sell quickly at a fair price, particularly during periods of market stress.

**Strategy Risk:** Our systematic investment strategies are based on historical data and quantitative models. Past performance is not indicative of future results, and our strategies may not perform as expected in future market conditions.

**Model Risk:** Quantitative models are based on assumptions that may prove incorrect. Models may fail to account for factors that affect market behavior, and historical relationships may not persist in the future.

**Sequence of Returns Risk:** For clients withdrawing from portfolios, the timing of investment returns relative to withdrawals can significantly impact portfolio longevity.

**Tax Risk:** Tax laws are subject to change, and changes in tax treatment may adversely affect investment returns.

## Item 9: Disciplinary Information

Foxholm Financial has no disciplinary information to disclose. Neither the firm nor any of its management persons have been involved in any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management.

## Item 10: Other Financial Industry Activities and Affiliations

### Financial Industry Activities

Foxholm Financial is not registered as a broker-dealer and does not have a pending application for broker-dealer registration.

Foxholm Financial is not registered as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

### Outside Business Activities

Robert Stowe, the firm's sole investment adviser representative, is actively engaged in business as a Senior Manager of Development for Sedgwick, an insurance technology services provider. This activity involves approximately 40 hours per week and is Mr. Stowe's primary employment. This activity is not investment-related. Mr. Stowe has structured his schedule to ensure that this outside business activity does not impair his ability to meet the needs of advisory clients or fulfill his fiduciary obligations.

Foxholm Financial advisory services are conducted outside of Mr. Stowe's Sedgwick work hours. The two roles do not conflict, as they serve different industries and client bases. Sedgwick provides insurance technology services to corporate clients, while Foxholm Financial provides

investment advisory services to individual clients.

## Material Relationships and Arrangements

Foxholm Financial does not have material relationships with other financial industry participants for the purpose of offering products or managing client assets.

Regarding annuity products, we provide:

- Educational consulting on annuity products (billed at hourly rates)
- Analysis of annuity suitability for client situations
- Referral to licensed insurance professionals if clients wish to proceed

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

### Code of Ethics

Foxholm Financial has adopted a Code of Ethics that sets forth standards of business conduct for all supervised persons. Our Code of Ethics is based on the principle that we owe a fiduciary duty to our clients. This duty includes the obligation to act in clients' best interests, provide full and fair disclosure of all material facts, and avoid conflicts of interest.

Our Code of Ethics includes provisions relating to:

- The confidentiality of client information
- Prohibitions on insider trading
- Restrictions on personal securities trading
- Reporting requirements for personal securities transactions
- Supervision of personal trading
- Compliance with applicable securities laws

We will provide a copy of our Code of Ethics to any client or prospective client upon request. To request a copy, please contact us at (404) 530-9093 or [contact@foxholm.com](mailto:contact@foxholm.com).

### Participation in Client Transactions

Neither Foxholm Financial nor any related person recommends to clients, or buys or sells for client accounts, securities in which we have a material financial interest.

### Personal Trading

Robert Stowe and other supervised persons are subject to personal trading policies that restrict purchases and sales of securities that are also recommended to or held by clients. These restrictions address the potential conflict of interest that arises when advisers could benefit from the same investments they recommend to clients.

Our personal trading policies include:

#### Pre-Clearance Requirements:

- Pre-clearance is required before purchasing or selling any reportable security in a personal account
- Pre-clearance is required before participating in any initial public offering (IPO) or private placement
- Certain transactions are exempt, including automatic investment plans (401(k), dividend reinvestment), U.S. Government securities, money market instruments, and open-end mutual funds

#### Blackout Periods:

- As an advice-only firm that does not execute trades for clients, blackout periods apply only to personal trading after making security-specific recommendations
- After recommending a specific security to a client, Mr. Stowe may not purchase or sell that security in personal accounts until after market close (4:00 PM ET) on the next full trading day

#### Prohibited Activities:

- Front-running: Buying a security for personal accounts before a client has had opportunity to act on a recommendation
- Scalping: Recommending securities to clients and then trading in the opposite direction for personal profit

#### Reporting and Oversight:

- All personal brokerage account statements are maintained chronologically in the firm's secure compliance records
- Quarterly reconciliation of personal securities records

- All personal trading records are available to regulatory examiners upon request

#### Disclosure of Personal Holdings:

- When recommending a security that we personally own, we disclose that ownership to the client

#### Outside Business Activity Restrictions:

In addition to the restrictions above, Mr. Stowe is prohibited from purchasing or selling securities of:

- **Sedgwick** (Employer) or any direct corporate parent or subsidiary
- **Major publicly traded vendors or partners** of Sedgwick where Mr. Stowe has access to non-public data regarding the business relationship (e.g., contract terms, usage data, financial arrangements)
- **Any issuer placed on the firm's Restricted List** due to possession of Material Non-Public Information (MNPI) obtained through outside employment

The Restricted List is maintained as part of the firm's compliance records and is reviewed quarterly.

Our personal trading practices are designed to ensure that client interests are placed ahead of our own personal interests.

## Item 12: Brokerage Practices

Foxholm Financial operates as an advice-only firm and does not have brokerage practices to disclose. We do not:

- Execute trades on behalf of clients
- Custody client funds or securities
- Direct clients to any particular custodian
- Aggregate orders or provide best execution

Clients retain full control of their accounts at their chosen custodian and are responsible for selecting their own broker-dealer. We do not receive compensation from any custodian or broker-dealer for client referrals.

### Non-Cash Compensation (Soft Dollars)

Foxholm Financial may receive occasional non-cash benefits from custodians, product sponsors, or industry conferences, such as:

- Educational materials and research reports
- Attendance at industry conferences or educational events (with registration costs covered by sponsors)
- Promotional items of nominal value (pens, notepads, etc.)

These non-cash benefits are not contingent on recommending any particular product or service, do not influence our investment recommendations, and do not create a conflict of interest with clients.

See Item 4 (Advisory Business) for a description of how we assist clients with implementation guidance.

## Item 13: Review of Accounts

### Advice-Only Reviews

Since Foxholm Financial operates as an advice-only firm and does not manage client accounts, reviews are conducted based on the client's selected service level:

**Periodic Investment Consulting Clients:** Reviews are conducted at specific scheduled intervals (quarterly, semi-annual, or annual) as part of the consulting engagement. Reviews assess portfolio performance, rebalancing opportunities, tax optimization strategies, and strategic adjustments based on changing market conditions or life circumstances. Between scheduled reviews, the Firm does not monitor client accounts.

**Hourly Consulting Clients:** Ad hoc consulting engagements are project-based and do not include ongoing reviews unless specifically engaged.

All reviews are initiated by scheduled appointments. Robert Stowe, as the firm's sole investment adviser representative, conducts all client reviews.

### Client Reports

Clients receive written documentation of recommendations and analysis as part of their engagement. This may include:

- Investment Policy Statements
- Portfolio allocation recommendations (for client implementation)
- Tax optimization strategies
- Retirement income projections

Since we do not manage client accounts, clients receive account statements directly from their chosen custodian (Fidelity, Schwab, Vanguard, etc.), not from Foxholm Financial.

## Item 14: Client Referrals and Other Compensation

### Incoming Referrals

Foxholm Financial does not compensate any person or entity for client referrals.

### Referrals to Other Professionals

We may recommend that clients work with other professionals such as attorneys, accountants, or insurance professionals for services outside our scope. We do not receive referral fees or other compensation for these recommendations. Recommendations are made based solely on our assessment of the professional's qualifications and the client's needs.

### Other Compensation

We do not receive any economic benefit from anyone other than our clients for providing advisory services, except for the minor non-cash benefits provided by custodians as described in Item 12.

## Item 15: Custody

**Foxholm Financial does not have custody of client assets.**

As an advice-only firm, we:

- Do not maintain physical custody of client funds or securities
- Do not have authority to deduct advisory fees from client accounts
- Do not possess client login credentials (usernames or passwords)
- Do not have trading authority over client accounts

**All fees are collected via AdvicePay, our third-party payment processor.** Clients pay invoices directly. We never access or deduct from their investment accounts.

#### Client Account Access Policy:

Foxholm Financial **strictly prohibits** possession of client usernames and passwords. We do not accept login credentials. If credentials are inadvertently received (e.g., via email), we will immediately instruct the client to change their password, delete the communication containing the credentials, and document the incident in our compliance records.

#### Approved methods for assisting clients:

1. **"Over-the-Shoulder" Guidance:** Screen sharing where clients log in and we provide verbal guidance
2. **View-Only Access:** "Third-Party View" or "Inquiry Access" through client custodians (allows viewing, not control)
3. **Secure Document Sharing:** Clients upload statements and documents through our secure client portal

**Inadvertent Receipt of Assets:** The Firm does not accept physical checks or stock certificates. If the Firm inadvertently receives funds or securities from a client (e.g., a check made payable to the custodian or to the Firm), we will return the asset to the sender within three (3) business days of receipt. We will maintain a log of such receipts and returns in our compliance records.

**Client Statements:** Clients receive account statements directly from their chosen custodian (Fidelity, Schwab, Vanguard, etc.). Foxholm Financial does not provide custodial statements.

## Item 16: Investment Discretion

**Foxholm Financial does not exercise investment discretion.**

As an advice-only firm, we:

- Do not have discretionary authority over client accounts
- Do not execute trades on behalf of clients
- Do not determine which securities to buy or sell for clients

**All advice is consultative.** Clients receive recommendations and are responsible for implementing those recommendations at their chosen custodian.

## Item 17: Voting Client Securities

Foxholm Financial does not vote proxies on behalf of clients. As an advice-only firm, we do not manage client securities and therefore have no proxy voting responsibilities.

Clients receive proxy solicitations directly from their custodian or the issuing company and are responsible for voting their own proxies.

We are available to answer questions about proxy matters upon request as part of our consulting services.

## Item 18: Financial Information

### Balance Sheet

We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Accordingly, we are not required to include a balance sheet with this brochure.

### Financial Condition

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

### Bankruptcy

Neither Foxholm Financial nor Robert Stowe has been the subject of a bankruptcy petition at any time during the past ten years.

### Business Continuity

As a sole-practitioner firm, Foxholm Financial maintains a Business Continuity Plan that addresses client service continuity in the event Mr. Stowe becomes incapacitated or is otherwise unable to provide services. The Plan designates an emergency contact who can communicate with clients, provide access to client records, and assist clients in finding alternative advisory services if necessary. The Firm's cloud-based infrastructure ensures client data remains secure and accessible during any disruption. Clients may request additional information about business continuity arrangements.

## Item 19: Requirements for State-Registered Advisers

### A. Principal Executive Officers

**Name:** Robert Stowe, AAMS® (Born 1982)

**Education:**

- Master of Education (M.Ed.), University of Florida (2014)
- Bachelor of Applied Science, Kennesaw State University (2012)

**Business Background:**

- Foxholm Financial, Inc., President & CCO (11/2025 – Present)
- Sedgwick, Senior Manager of Development (04/2025 – Present)
- Bottomline Technologies, Senior Manager (06/2019 – 03/2025)

### B. Other Business Activities

Robert Stowe is actively engaged in business as a Senior Manager of Development for Sedgwick, an insurance technology services provider. This activity involves approximately 40 hours per week. The specific hours of this employment vary and may coincide with standard market hours. Mr. Stowe has structured his schedule to ensure that this outside business activity does not impair his ability to meet the needs of advisory clients or fulfill his fiduciary obligations. This activity is not investment-related. Mr. Stowe's primary compensation comes from this employment.

**Trading Hours Availability:** Consequently, Mr. Stowe is available for advisory duties primarily outside of NYSE market hours (9:30 AM – 4:00 PM ET). This limitation is mitigated by the firm's Advice-Only model, which does not require real-time trade execution.

**Conflict Mitigation:** To mitigate potential conflicts regarding time allocation, Foxholm Financial limits its advisory services to non-discretionary planning and does not offer trade execution services, thereby reducing the need for real-time market monitoring.

**Material Non-Public Information:** In his role at Sedgwick, Mr. Stowe has access to information regarding pending business deals, potential contract negotiations, and prospective corporate partnerships before they are publicly announced. To address this potential conflict, Foxholm Financial maintains a **Restricted List** of securities. Mr. Stowe is prohibited from buying or selling securities of any company known by him to be engaged in active business negotiations or significant contract discussions with his employer. The Restricted List is reviewed quarterly and updated whenever Mr. Stowe becomes aware of new material non-public information through his outside employment.

### C. Performance-Based Fees

Foxholm Financial, Inc. is not compensated by performance-based fees.

### D. Disciplinary History

Neither Foxholm Financial nor Robert Stowe has been involved in an arbitration claim alleging damages in excess of \$2,500 which resulted in an award or sanction, or been found liable in any civil, self-regulatory organization, or administrative proceeding.

## **E. Relationships with Issuers of Securities**

Neither Foxholm Financial nor Robert Stowe has any arrangement or relationship with any issuer of securities.

*END OF FORM ADV PART 2A*

**Version:** 1.2 **Last Updated:** March 15, 2026 **Prepared By:** Robert Stowe, CCO

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Form ADV Part 2B: Brochure Supplement

## Item 1: Cover Page

# Robert Stowe, AAMS®

Individual CRD Number: 8217129

Foxholm Financial, Inc.

### Doing Business As

Foxholm Financial

### Business Address

2266 Cottage Grove Ave SE  
Atlanta, GA 30317

### Phone

(404) 530-9093

### Email

[contact@foxholm.com](mailto:contact@foxholm.com)

### Website

<https://foxholm.com>

### Date of Brochure

February 10, 2026

*This brochure supplement provides information about Robert Stowe that supplements the Foxholm Financial brochure. You should have received a copy of that brochure.*

*Please contact us at (404) 530-9093 or [contact@foxholm.com](mailto:contact@foxholm.com) if you did not receive the firm's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Robert Stowe is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## Item 2: Educational Background and Business Experience

### Robert Stowe

Year of Birth: 1982

#### Educational Background

Degree	Institution	Year
Master of Education (M.Ed.) in Curriculum and Instruction, Educational Technology Emphasis	University of Florida	2014
Bachelor of Applied Science, Information Technology	Kennesaw State University	2012
Associate of Applied Science, Web Applications & Services Development	Central Georgia Technical College	2010

#### Professional Designations

##### Accredited Asset Management Specialist<sup>SM</sup> (AAMS<sup>®</sup>)

- Issuing Organization: College for Financial Planning<sup>®</sup>
- Year Earned: 2025

The AAMS<sup>®</sup> designation is awarded by the College for Financial Planning<sup>®</sup> to individuals who complete a specialized program focused on asset management, including investment strategies, asset allocation, portfolio construction, investment selection, and risk management. To earn the designation, candidates must:

1. Complete a self-study course covering topics including asset management concepts, risk tolerance assessment, asset allocation strategies, and investment vehicles
2. Pass a final examination demonstrating proficiency in asset management principles
3. Agree to abide by a code of ethics and professional responsibility standards
4. Complete 16 hours of continuing education every two years to maintain the designation

##### Series 65 (Uniform Investment Adviser Law Examination)

- Administrator: FINRA (Financial Industry Regulatory Authority)
- Year Passed: 2025

The Series 65 examination is a securities license entitling the holder to act as an investment adviser representative. The exam covers topics including economics and analysis, investment vehicle characteristics, client investment recommendations and strategies, and laws, regulations, and guidelines including prohibition on unethical business practices.

#### Business Experience

Mr. Stowe brings over 15 years of experience in technology leadership, software architecture, and data systems to his role as a financial advisor. His background in managing complex systems and global teams informs Foxholm Financial's disciplined, data-driven approach to wealth management.

**Owner, President, & Chief Compliance Officer** Foxholm Financial, Inc. (November 2025 – Present) Founded and leads an advice-only investment advisory firm serving STEM professionals. Responsible for all investment research, financial planning, and regulatory compliance.

**Senior Manager of Development** Sedgwick (April 2025 – Present) Manages software development for legal spend management solutions. Leads technical strategy and execution for high-volume data processing systems.

**Senior Manager of Development** Bottomline Technologies (June 2019 – March 2025) Oversaw global engineering teams for a FinTech division generating \$100M+ ARR. Directed the technical overhaul of enterprise SaaS applications, focusing on scalability and process automation.

**Manager of User Interface Development** Bottomline Technologies (December 2015 – June 2019) Managed development of React.js financial modeling applications. Led cross-functional teams to build scalable component libraries used across multiple enterprise products.

**Senior User Interface Architect** Bottomline Technologies (June 2012 – December 2015) Architected the modernization of legacy financial applications. Established company-wide technical standards for user interface development.

**Senior User Interface Developer** WebMD (July 2010 – June 2012) Developed core features for a medical information platform serving 110 million monthly users. Built secure data systems for processing sensitive user information.

## Item 3: Disciplinary Information

Robert Stowe has no disciplinary information to disclose. He has not been involved in any legal or disciplinary events that are material to a client's evaluation of his qualifications to provide investment advice.

## Item 4: Other Business Activities

### Investment-Related Activities

Robert Stowe is not engaged in any other investment-related business or occupation outside of his role at Foxholm Financial.

### Non-Investment-Related Activities

Robert Stowe is actively engaged in business as a Senior Manager of Development for Sedgwick, an insurance technology services provider. This activity involves approximately 40 hours per week. The specific hours of this employment vary and may coincide with standard market hours. Mr. Stowe has structured his schedule to ensure that this outside business activity does not impair his ability to meet the needs of advisory clients or fulfill his fiduciary obligations. This activity is not investment-related. Mr. Stowe's primary compensation comes from this employment.

**Trading Hours Availability:** Consequently, Mr. Stowe is available for advisory duties primarily outside of NYSE market hours (9:30 AM – 4:00 PM ET). This limitation is mitigated by the firm's Advice-Only model, which does not require real-time trade execution.

Foxholm Financial is operated on a part-time basis (approximately 15 hours per week), with advisory activities conducted outside of Mr. Stowe's Sedgwick work hours. The two roles do not conflict, as they serve different industries and client bases. Sedgwick provides insurance technology services to corporate clients, while Foxholm Financial provides investment advisory services to individual clients.

**Material Non-Public Information:** In his role at Sedgwick, Mr. Stowe has access to information regarding pending business deals, potential contract negotiations, and prospective corporate partnerships before they are publicly announced. To address this potential conflict, Foxholm Financial maintains a **Restricted List** of securities. Mr. Stowe is prohibited from buying or selling securities of any company known by him to be engaged in active business negotiations or significant contract discussions with his employer. The Restricted List is reviewed quarterly and updated whenever Mr. Stowe becomes aware of new material non-public information through his outside employment.

## Item 5: Additional Compensation

### Economic Benefits from Third Parties

Robert Stowe does not receive any economic benefit from anyone other than clients for providing advisory services.

### Sales Awards or Prizes

Robert Stowe does not receive sales awards, prizes, or other compensation based on the volume of sales or assets gathered.

### Non-Cash Compensation

Robert Stowe may receive occasional non-cash benefits from custodians, product sponsors, or industry conferences, such as:

- Educational materials and research reports
- Attendance at industry conferences or educational events (with registration costs covered by sponsors)
- Promotional items of nominal value (pens, notepads, etc.)

These non-cash benefits are not contingent on recommending any particular product or service, do not influence our investment recommendations, and do not create a conflict of interest with clients.

## Item 6: Supervision

### Supervision Structure

Robert Stowe is the sole owner and investment adviser representative of Foxholm Financial. As such, he is not directly supervised by another individual within the firm.

### Compliance Oversight

Robert Stowe serves as the firm's Chief Compliance Officer (CCO) and has implemented comprehensive compliance policies and procedures to ensure adherence to applicable regulatory requirements. These measures include:

#### Policies and Procedures:

- Written compliance manual addressing all material aspects of advisory operations
- Personal trading policies including pre-clearance requirements
- Code of Ethics governing professional conduct
- Procedures for reviewing and approving marketing materials

- Client suitability documentation requirements

#### **Supervisory Activities:**

Mr. Stowe conducts the following ongoing compliance monitoring:

- **Quarterly:** Personal securities record reconciliation, client folder permissions audit, CRM data backup verification, investment research documentation
- **Annually:** Comprehensive review of all compliance policies, Code of Ethics acknowledgment, Business Continuity Plan test, cybersecurity risk assessment, vendor due diligence review, tool validation procedures

All supervisory activities are documented using a compliance calendar and annual checklist that tracks completion of each required task. Documentation is maintained in accordance with SEC recordkeeping requirements.

#### **External Resources:**

- Use of technology platforms for compliance policy management and regulatory calendar
- Continuing education to stay current on regulatory requirements

### **Supervision Contact**

For questions regarding supervision or compliance matters, contact:

**Robert Stowe, Chief Compliance Officer** Phone: (404) 530-9093 Email: [robert.stowe@foxholm.com](mailto:robert.stowe@foxholm.com)

## **Item 7: Legal and Financial History**

### **Arbitration Claims**

Robert Stowe has not been found liable in any arbitration claim alleging damages in excess of \$2,500, and has not been the subject of an arbitration award of any amount.

### **Civil, Self-Regulatory, or Administrative Proceedings**

Robert Stowe has not been found liable in any civil, self-regulatory organization, or administrative proceeding.

### **Bankruptcy**

Robert Stowe has not been the subject of a bankruptcy petition at any time during the past ten years.

### **Important Note Regarding Sole Practitioner Status**

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As the sole investment adviser representative of Foxholm Financial, Robert Stowe provides all advisory services to clients. For solo practitioners, the SEC and state regulators permit all information that would otherwise appear in Part 2B to be incorporated into Part 2A. Foxholm Financial has prepared this Part 2B supplement for completeness and to ensure clients have ready access to information specifically about the individual providing their advisory services.

Should Foxholm Financial add additional investment adviser representatives in the future, separate Part 2B supplements will be prepared for each supervised person providing advisory services to clients.

*END OF FORM ADV PART 2B*

**Version: 1.1 Last Updated:** February 10, 2026 **Prepared By:** Robert Stowe, CCO