

**FORM ADV PART 2A
DISCLOSURE BROCHURE**

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This brochure provides information about the qualifications and business practices of R.M. Shannon Wealth Management, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at: 651-321-4620. 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.

Additional information about R.M. Shannon Wealth Management, LLC (CRD #290718) is available on the SEC's website at www.adviserinfo.sec.gov

March 13, 2026

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Since the previous annual filing of this ADV Part 2 on March 10, 2025, there have been no material changes.

Item 3: Table of Contents

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Item 4: Advisory Business

Firm Description

R.M. Shannon Wealth Management, LLC (“R.M. Shannon Wealth Management”) was founded in 2017. Ryan Shannon is 100% owner.

R.M. Shannon Wealth Management is a fee-only investment management firm. R.M. Shannon Wealth Management does not sell annuities or insurance products.

R.M. Shannon Wealth Management does not act as a custodian of Client assets.

An evaluation of each Client's initial situation is provided to the Client, often in the form of a net worth statement, risk analysis or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the Client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the Client on an as-needed basis and may charge fees of their own. Conflicts of interest will be disclosed to the Client in the event they should occur.

Types of Advisory Services

ASSET MANAGEMENT

R.M. Shannon Wealth Management offers discretionary asset management services to advisory Clients. R.M. Shannon Wealth Management will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize R.M. Shannon Wealth Management discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When deemed appropriate for the Client, R. M. Shannon Wealth Management may hire Sub-advisors to manage all or a portion of the assets in the Client account. When using subadvisors, R. M. Shannon Wealth Management will work on a non-discretionary basis and it will be up to the Client to hire and fire Sub-advisors as they deem suitable. Sub- advisors will maintain the models or investment strategies agreed upon between Sub- advisor and R. M. Shannon Wealth Management. Sub-advisors execute all trades on behalf of R. M. Shannon Wealth Management in Client accounts. R. M. Shannon Wealth Management will be responsible for the overall direct relationship with the Client. Client retains the authority to terminate the Sub-advisor relationship.

R. M. Shannon Wealth Management may provide investment advice and due diligence about certain privately-issued securities for those Clients who represent they are accredited investors and who otherwise meet certain investor standards. (To qualify as an accredited investor, you must have a net worth, not including your primary residence of at least \$1 million; or have an income exceeding \$200,000 in each of the two most recent years or joint income with a spouse exceeding \$300,000 for those years and a reasonable expectation of the same income level in the current year.) R. M. Shannon Wealth

Management will collect all available information—marketing materials, auditing reports, balance sheets, offering memorandum, subscription agreement, review historical records and access opportunities and risks for investment now and for the years ahead. Prepare and seek answers to relevant due diligence questions. Interview manager and/or make site visit. Consider the time horizon and the sponsor’s strength over an extended period of time. Due diligence will continue throughout the duration of the investment. R. M. Shannon Wealth Management will meet with the Client at least on an annual basis for the duration of the investment.

Held-Away Account Services

We provide an additional service for accounts not directly managed by our firm but where we do have discretion and may leverage an Order Management System to implement asset allocation or rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, 529 plans, variable annuities, and other assets in which we do not custody. It is also possible that these accounts will be serviced on a non-discretionary basis, for which we regularly review the current holdings and available investment options in these accounts, monitor the accounts, and provide recommendations to the Client with regards to rebalancing and implementing our strategies as necessary.

ONGOING FINANCIAL PLANNING

This service involves working one-on-one with a planner over an extended period of time. By paying a fixed fee, Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefits, retirement planning, insurance, investments, college planning, and estate planning. Once the Client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the Client. Clients subscribing to this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the Client's convenience. The plan and the Client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

PROJECT-BASED FINANCIAL PLANNING AND CONSULTING

We provide project-based financial planning services that include a thorough review of all applicable topics including but not limited to; Wills, Estate Plans and Trusts, Investments, Taxes, Qualified Plans, Insurance, Retirement Income, Social Security, Executive

Compensation, and College Planning will be reviewed. Clients may elect to have a financial plan completed only on a select few of the items mentioned above. If a conflict of interest exists between the interests of R.M. Shannon Wealth Management and the interests of the Client, the Client is under no obligation to act upon R.M. Shannon Wealth Management's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through R.M. Shannon Wealth Management. Financial plans will be completed and delivered inside of ninety (90) days contingent upon timely delivery of all required documentation.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

R.M. Shannon Wealth Management does not sponsor any wrap fee programs.

Client Assets under Management

As of December 31, 2025, R.M. Shannon Wealth Management reports \$ 30,971,803 in assets under management, all on a discretionary basis.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

R.M. Shannon Wealth Management offers discretionary direct asset management services to advisory Clients. R.M. Shannon Wealth Management charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
Up to \$5,000,000	1.00%	0.25%
\$5,000,001 to \$10,000,000	0.75%	0.1875%
\$10,000,001 to \$15,000,000	0.50%	0.125%
Over \$15,000,000	0.25%	0.0625%

This is a blended fee schedule; the entire portfolio is charged the same asset management fee. For example, a Client with \$8,000,000 under management would pay \$72,500 on an annual basis. $\$5,000,000 \times 1.00\% = \$50,000$ plus $\$3,000,000 \times 0.75\% = \$22,500$.

The value of held-away assets is included in the client's total assets under management that our fee is calculated on.

Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. Fees may be negotiable. If margin is utilized, the fees will be billed based on the gross asset value of the account. Lower fees for comparable services may be available from other sources. Clients may terminate

their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. Clients may terminate advisory services with thirty (30) days written notice. For accounts opened or closed mid-billing period, unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

R.M. Shannon Wealth Management may also utilize the services of a Sub-advisor to manage Clients' investment portfolios. Client will enter into Sub-advisor agreements with other registered investment advisor firms. When using Sub-advisors, the Client will pay additional fees for the Sub-advisor's services. The Sub-advisor's fees will be disclosed on the agreement that the Client signs. The Sub-advisor will deduct their portion of the fee from the Client's managed account(s) and R.M. Shannon Wealth Management will deduct our portion of the fee from the Client's managed account(s).

Fees for Private Placements will be charged as part of Clients assets under management.

For fees that are directly deducted from the account by the custodian:

- R.M. Shannon Wealth Management will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;
- R.M. Shannon Wealth Management will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

ONGOING FINANCIAL PLANNING

Ongoing Financial Planning consists of an ongoing fee that is paid either monthly or quarterly, in arrears, starting at a rate of \$5,000 per year. The fee may be negotiable in certain cases. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days' notice. Upon termination of any agreement, the fee will be prorated, and any unearned fee will be refunded to the Client.

PROJECT-BASED FINANCIAL PLANNING AND CONSULTING

R.M. Shannon Wealth Management charges an hourly or fixed fee for project-based financial planning for Clients that would only like a review of a specific few of the items mentioned in Item 4. R.M. Shannon Wealth Management charges a fixed fee for full financial planning including all of applicable topics in Item 4. Prior to the planning process the Client will be provided an estimated plan fee. The goal is for services are completed and delivered inside of ninety (90) days. The length of time required to complete the project is dependent on several factors including the needs of the Client, the Client's ability to provide any necessary information and documentation, as well as the complexity of their financial situation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be

refunded to the Client, or any unpaid earned fees will be due to R.M. Shannon Wealth Management. R.M. Shannon Wealth Management reserves the right to waive some or all of the financial planning fee should the Client engage R.M. Shannon Wealth Management for investment management services.

HOURLY FEES

Financial Planning Services offered on an hourly fee of \$300 per hour.

FIXED FEES

Financial Planning Services offered on a flat fee between \$2,500 and \$20,000.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery.

Combined Services

Asset Management Clients with \$500,000 or more in assets under management with R.M. Shannon Wealth Management are offered Ongoing Financial Planning services at no additional cost.

Minimum Fees

Clients engaging R.M. Shannon Wealth Management for both Asset Management and Ongoing Financial Planning services, the minimum annual fee is \$5,000. In certain circumstances, Financial Planning will be offered in conjunction with Asset Management at no additional cost. The minimum annual fee is negotiable at the Advisor's discretion.

Client Payment of Fees

Investment management fees are billed quarterly in advance, meaning that we invoice you before the billing period. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for project-based financial plan are billed 50% in advance with the balance due upon plan delivery.

Fees for standalone Ongoing Financial Planning are paid either monthly or quarterly, in advance.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include mutual fund transaction fees, postage and handling, margin interest, and miscellaneous fees.

For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Fees for project-based financial plans are billed 50% in advance with the balance due upon plan delivery. Investment management fees are billed quarterly in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to R.M. Shannon Wealth Management.

External Compensation for the Sale of Securities to Clients

R.M. Shannon Wealth Management does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of R.M. Shannon Wealth Management.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

R.M. Shannon Wealth Management does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for R.M. Shannon Wealth Management to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

R.M. Shannon Wealth Management generally provides investment advice to high-net-worth individuals.

Client relationships vary in scope and length of service.

Account Minimums

R.M. Shannon Wealth Management requires a minimum of \$500,000 to open an account. In certain instances, the minimum account size may be lowered or waived.

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

Methods of Analysis

Security analysis methods may include fundamental analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

In developing a financial plan for a Client, R.M. Shannon Wealth Management's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing

written notice to R.M. Shannon Wealth Management. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy. Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with R.M. Shannon Wealth Management:

- *Market Risk:* The prices of securities held by mutual funds in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies.

Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment’s return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a “book-entry” only investment without a paper certificate of ownership.
- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the Client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
- *Leveraged Risk:* The risks involved with using leverage may include compounding of returns (this works both ways – positive and negative), possible reset periods, volatility, use of derivatives, active trading and high expenses.

The specific risks associated with financial planning include:

- Risk of Loss
 - Client fails to follow the recommendations of R.M. Shannon Wealth Management resulting in loss

- Client has changes in financial status or lifestyle and therefore plan recommendations are no longer valid.

Item 9: Disciplinary Information

Criminal or Civil Actions

R.M. Shannon Wealth Management and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

R.M. Shannon Wealth Management and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

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

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

No affiliated representatives of R.M. Shannon Wealth Management are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither R.M. Shannon Wealth Management nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest No affiliated representatives of R.M. Shannon Wealth Management maintain a material relationship.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

R.M. Shannon Wealth Management may also utilize the services of a Sub-advisor to manage Clients' investment portfolios. Sub-advisors will maintain the models or investment strategies agreed upon between Sub-advisor and R.M. Shannon Wealth Management. Sub-advisors execute all trades on behalf of R.M. Shannon Wealth Management in Client accounts. R.M. Shannon Wealth Management will be responsible for the overall direct relationship with the Client. Client retains the authority to terminate the Sub-advisor relationship..

Client will work with R.M. Shannon Wealth Management on a non-discretionary basis when using Sub-Advisors. Once hired, Sub-advisors shall have discretionary authority as is granted in the Agreement. In addition, Client may grant such Sub-advisors full authority to further delegate such discretionary investment authority to additional Sub-advisors.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent

contractors) of R.M. Shannon Wealth Management have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of R.M. Shannon Wealth Management affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of R.M. Shannon Wealth Management. The Code reflects R.M. Shannon Wealth Management and its supervised persons’ responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

R.M. Shannon Wealth Management’s policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of R.M. Shannon Wealth Management may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

R.M. Shannon Wealth Management’s Code is based on the guiding principle that the interests of the Client are our top priority. R.M. Shannon Wealth Management’s officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client’s interests over the interests of either affiliated persons or the company.

The Code applies to “access” persons. “Access” persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

R.M. Shannon Wealth Management and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

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

R.M. Shannon Wealth Management and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide R.M. Shannon Wealth Management with copies of their brokerage statements.

The Chief Compliance Officer of R.M. Shannon Wealth Management is Ryan Shannon. He

reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

R.M. Shannon Wealth Management does maintain a firm proprietary trading account. R.M. Shannon Wealth Management does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide R.M. Shannon Wealth Management with copies of their brokerage statements.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

- *Directed Brokerage.*

RM. Shannon Wealth Management requires that Clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc.¹ ("Schwab"), a FINRA² registered broker-dealer and SIPC³ member, to maintain custody of Clients' assets and to effect trades for their accounts. R.M. Shannon Wealth Management is independently owned and operated and not affiliated with Schwab. R.M. Shannon Wealth Management 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 in meeting our fiduciary obligations to Clients.

Schwab provides R.M. Shannon Wealth Management 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 services 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 R.M. Shannon Wealth Management other products and services that benefit R.M. Shannon Wealth Management 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 R.M. Shannon Wealth Management in managing and administering our Clients' accounts include software and other technology that:

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

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

- compliance, legal and business consulting;
- publications and conferences on practice management and business succession; and
- 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 R.M. Shannon Wealth Management. 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.

R.M. Shannon Wealth Management reserves 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 Schwab (or any other broker), it should be understood that R.M. Shannon Wealth Management 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 other than Schwab). Clients should note that, while R.M. Shannon Wealth Management has a reasonable belief that Schwab is able to obtain best execution and competitive prices, our firm will not

independently seek best execution price capability through other brokers.

Aggregating Securities Transactions for Client Accounts

R.M. Shannon Wealth Management is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of R.M. Shannon Wealth Management. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

Research and Other Soft-Dollar Benefits

We do not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Charles Schwab may provide us with certain services that may benefit us.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed annually by the Chief Compliance Officer of R.M. Shannon Wealth Management. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the Client and a review is done only upon request of Client.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by R.M. Shannon Wealth Management's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

Performance reports will be provided by R.M. Shannon Wealth Management at least quarterly to Clients with assets under management, exclusive of Assets Held Away.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

R.M. Shannon Wealth Management receives an economic benefit from Schwab in the form of the support products and services it makes available to R.M. Shannon Wealth Management and other independent investment advisors that have their Clients maintain accounts at Schwab. These products and services, how they benefit R.M. Shannon Wealth Management,

and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to R.M. Shannon Wealth Management of Schwab’s products and services is not based on R.M. Shannon Wealth Management giving particular investment advice, such as buying particular securities for our Clients.

Advisory Firm Payments for Client Referrals

R.M. Shannon Wealth Management does not provide compensation for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by R.M. Shannon Wealth Management.

R.M. Shannon Wealth Management is deemed to have constructive custody solely because advisory fees are directly deducted from Client’s accounts by the custodian on behalf of R.M. Shannon Wealth Management.

Item 16: Investment Discretion

Discretionary Authority for Trading

R.M. Shannon Wealth Management requires discretionary authority to manage securities accounts on behalf of Clients. R.M. Shannon Wealth Management has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

R.M. Shannon Wealth Management allows Client’s to place certain restrictions, as outlined in the Client’s Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to R.M. Shannon Wealth Management in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. R.M. Shannon Wealth Management does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

R.M. Shannon Wealth Management does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, R.M. Shannon Wealth Management will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because R.M. Shannon Wealth Management does not serve as a custodian for Client funds or securities and R.M. Shannon Wealth Management does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

R.M. Shannon Wealth Management has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

Neither R.M. Shannon Wealth Management nor its management has had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

None to report.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Ryan M. Shannon, CFP®

R.M. Shannon Wealth Management, LLC

Office Address:

1595 Selby Ave
Suite 302
St. Paul, MN 55104

Telephone:

651-321-4620

Email:

ryan@rmshannonwealth.com

Website:

www.rmshannonwealth.com

This brochure supplement provides information about Ryan Shannon and supplements the R.M. Shannon Wealth Management, LLC's brochure. You should have received a copy of that brochure. Please contact Ryan Shannon if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Ryan Shannon (CRD #4972217) is available on the SEC's website at www.adviserinfo.sec.gov.

June 10, 2025

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer & Chief Compliance Officer – Ryan Shannon

- Year of birth: 1980
-

Item 2 - Educational Background and Business Experience

Educational Background:

- University of St. Thomas; B.A in Business-Financial Management; 2005

Business Experience:

- R.M. Shannon Wealth Management, LLC; Managing Member/Investment Advisor Representative; 01/2018 - Present
- Accredited Investors; Wealth Management; 05/2012 – 01/2018
- Webb Financial Group; Investment Advisor; 06/2006 – 05/2012

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

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

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

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 - Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 - Other Business Activities Engaged In

Managing Member, Ryan Shannon, does not have an outside business activities.

Item 5 - Additional Compensation

Ryan Shannon does not receive any performance-based fees.

Item 6 - Supervision

Since Ryan Shannon is the sole owner and investment adviser representative of R.M. Shannon Wealth Management. He is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm’s Compliance Manual. He can be reached at: ryan@rmshannonwealth.com or at: 651-321-4620.

Item 7 - Requirements for State-Registered Advisors

Arbitration Claims: None to report.

Self-Regulatory Organization or Administrative Proceeding: None to report.

Bankruptcy Petition: None to report.