

Omnia Finance, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: February 23, 2013

This Disclosure Brochure provides information about the qualifications and business practices of Omnia Finance, LLC (“Omnia”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (701) 371-4432.

Omnia is a Registered Investment Advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Omnia to assist you in determining whether to retain the Advisor.

Additional information about Omnia and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

**Omnia Finance, LLC
CRD No: 159820
Linn Grove Center, Suite D2
5012 53rd Street S
Fargo, ND 58104
Phone: (701) 371-4432**

Item 2 – Material Changes

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the “Advisers Act”). The amendments are designed to require a Registered Investment Advisor to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor’s business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*.

Part 2A (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of Omnia.

Omnia believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

There are no material changes since the last filing of this Disclosure Brochure.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Omnia.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

To review the firm information for Omnia:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **159820** (our firm’s CRD number) in the field labeled “Firm IARD/CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (701) 371-4432.

Item 3 – Table of Contents

Item 1 – Cover Page.....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Services	4
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	4
C. Client Account Management - continued	5
D. Wrap Fee Programs	5
E. Assets Under Management.....	5
Item 5 – Fees and Compensation.....	5
A. Fees for Advisory Services	5
B. Fee Billing	5
C. Other Fees and Expenses	6
D. Advance Payment of Fees and Termination.....	6
E. Compensation for Sales of Securities	6
Item 6 – Performance-Based Fees and Side-By-Side Management	6
Item 7 – Types of Clients	6
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	7
A. Methods of Analysis.....	7
B. Risk of Loss.....	7
Item 9 – Disciplinary Information	7
Item 10 – Other Financial Industry Activities and Affiliations	7
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	7
A. Code of Ethics.....	7
B. Personal Trading with Material Interest.....	8
C. Personal Trading in Same Securities as Clients.....	8
D. Personal Trading at Same Time as Client	8
Item 12 – Brokerage Practices.....	8
A. Recommendation of Custodian[s].....	8
B. Aggregating and Allocating Trades	9
Item 13 – Review of Accounts.....	9
A. Frequency of Reviews	9
B. Causes for Reviews	9
C. Review Reports	9
Item 14 – Client Referrals and Other Compensation.....	9
A. Compensation Received by Omnia.....	9
B. Client Referrals from Solicitors	9
Item 15 – Custody	9
Item 16 – Investment Discretion	9
Item 17 – Voting Client Securities	10
Item 18 – Financial Information	10
ADV Part 2B	11
Privacy Policy.....	13

Item 4 – Advisory Services

A. Firm Information

Omnia Finance, LLC (“Omnia” or the “Advisor”) is a Registered Investment Advisor with the U.S. Securities and Exchange Commission and is organized as a Limited Liability Company (LLC) under the laws of the State of North Dakota. Omnia was founded in 2010, and is owned and operated by CEO, Sean L. Burian. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Omnia.

B. Advisory Services Offered

Omnia offers investment advisory services to institutional investors in various states (each referred to as a “Client”).

Account Portfolio Management

Omnia provides discretionary investment management and consulting services for insitutuional Clients. Omnia works with each Client to identify their investment needs and risk profile to develop an investment policy. Omnia will then construct and manage the Client portfolios consistent with the stated investment mandates.

Omnia primarily constructs portfolios comprised of U.S. Government securities, municipal securities and cash equivalents. Omnia may also utilize other security types to meet the needs of a particular Client.

Omnia’s investment strategies are customized based on the investment policy statement for each Client. Omnia will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk levels agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Omnia evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. The Advisor may recommend employing cash positions as a possible hedge against market movement. Omnia may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s investment policy.

Omnia will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Omnia accept or maintain custody of a Client’s funds or securities.

Consulting Services

Omnia will typically provide a variety of consulting services for Clients, pursuant to a written Consulting Agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation.

Generally, such consulting services will involve preparing a financial analysis or rendering a financial consultation based on one or more areas of need, including, but not limited to investment planning, investment research, portfolio construction and/or due diligence.

Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

C. Client Account Management

Prior to engaging Omnia to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client.

C. Client Account Management - continued

These services may include:

- Establishing an Investment Policy Statement – Omnia, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Portfolio Construction – Omnia will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Omnia will provide investment management and ongoing oversight of the Client's portfolio and overall account.

D. Wrap Fee Programs

Omnia does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Omnia.

E. Assets Under Management

Omnia manages \$218,000,000 in discretionary assets and \$0 in non-discretionary assets as of December 31, 2012, the date of this filing. Assets under management shall be updated again following the December 31, 2012 fiscal year end. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Omnia and the Client.

A. Fees for Advisory Services

Account Portfolio Management

Investment Advisory Fees are paid monthly in arrears pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on negotiated monthly retainer based on the scope and complexity of the services provided. The monthly retainer may range from \$1,000 to \$10,000 monthly based on the scope and complexity of services to be provided in the scope of Investment Advisory Agreement.

Consulting Services

Omnia offers consulting services on an hourly basis ranging from \$100 to \$125 per hour or on a fixed fee basis, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

B. Fee Billing

Account Portfolio Management

Investment Advisory Fees are invoiced by the Advisor monthly and due upon receipt.

Consulting Services

Consulting Fees are invoiced by the Advisor monthly and/or upon completion of the agreed upon deliverable and due upon receipt.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Omnia, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by Omnia is separate and distinct from these custodian and execution fees.

In addition, all fees paid to Omnia for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Omnia, but would not receive the services provided by Omnia which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Omnia to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Account Portfolio Management

Omnia is compensated for its services at the end of the month investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with Omnia, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

Consulting Services

In the event that a Client should wish to cancel a Consulting Agreement, the Client shall be billed for actual hours logged on the consulting project times the agreed upon hourly rate. Either party may terminate a Consulting Agreement at anytime by providing written notice to the other party. In addition, the Client may terminate the Agreement within five (5) days of signing the Advisor's Consulting Agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client.

E. Compensation for Sales of Securities

Omnia does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

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

Omnia does not charge performance-based fees for its investment advisory services. The fees charged by Omnia are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Omnia does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Omnia offers investment advisory services to institutional investors and other types of clients. The relative percentage each type of Client is available on Omnia's Form ADV Part 1. These percentages will change over time. Omnia generally does not impose a minimum account size for establishing a relationship.

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

A. Methods of Analysis

Omnia primarily utilizes its proprietary research and analysis methods in developing investment strategies for its Clients. Research and analysis from Omnia is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Omnia will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. The Advisor shall rely on the information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in investment mandate or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (701) 371-4432.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Omnia or any of its employees. Omnia and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **159820** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions. You may also research the background of Sean L. Burian by selecting the Investment Adviser Representative and entering Mr. Burian's Individual CRD# **6003206** in the field labeled "Individual CRD Number".

Item 10 – Other Financial Industry Activities and Affiliations

The sole business of Omnia is to provide investment advisory services to its Clients. Omnia does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts. Mr. Burian, in his separate capacity, also serves as an Executive Vice President with BlackRidge Financial, Inc.

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

A. Code of Ethics

Omnia has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Omnia. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Omnia and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Omnia associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. Omnia has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (701) 371-4432.

Omnia Finance, LLC

Linn Grove Center, Suite D2

5012 53rd Street S * Fargo, ND 58104

Phone: (701) 371-4432

B. Personal Trading with Material Interest

Omnia and its advisory persons may at times purchase or sell the same or similar securities that may be recommended to and purchased on behalf of Clients. Omnia does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advice an investment company. Omnia does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Omnia allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

D. Personal Trading at Same Time as Client

While Omnia allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, these trades do not occur at the same time. Omnia will place trades only after Client orders have been placed and filled.

At no time, will Omnia or any associated person of Omnia, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Omnia generally has the discretionary authority to select the broker-dealer for execution of trades for Client account. This discretionary authority is governed by the terms of the Investment Advisory Agreement with each Client as well as the “approved list” of broker-dealers selected by the Client. Omnia may recommend broker-dealers to Clients. Clients are not obligated to use the recommended broker-dealer(s) and will not incur any extra fee or cost associated with using a broker-dealer not recommended by Omnia. Omnia does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers. Omnia will seek the best trade execution based on these parameters.

The Client will select the custodian to safeguard Client assets and authorize Omnia to direct trades through the respective custodian(s). Omnia will never assume custody of Client funds or securities.

Following are additional details regarding the brokerage practices of the Advisor:

- 1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Omnia does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
- 2. Brokerage Referrals** - Omnia does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
- 3. Directed Brokerage** – Omnia will direct brokerage only at the request of the Client. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]).

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Omnia will execute its transactions through an unaffiliated broker-dealer selected by the Client. Omnia may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by Mr. Burian, CEO of Omnia.

B. Causes for Reviews

Reviews are generally conducted monthly, but may be more or less frequent at the Client's request. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s].

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Omnia

Omnia is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. Omnia does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party.

B. Client Referrals from Solicitors

Omnia does not engage paid solicitors for Client referrals.

Item 15 – Custody

Omnia does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Omnia to utilize that custodian for the Client's security transactions. Omnia encourages Clients to review statements provided by account Custodian(s). For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 – Investment Discretion

Omnia generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Omnia. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Omnia will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Omnia does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither Omnia, nor its management has any adverse financial situations that would reasonably impair the ability of Omnia to meet all obligations to its Clients. Neither Omnia, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Omnia is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

Form ADV Part 2B – Brochure Supplement

for

**Sean L. Burian, CFA
Chief Executive Officer**

Effective: February 23, 2013

This Brochure Supplement provides information about the background and qualifications of Sean L. Burian, CFA (CRD# **6003206**) in addition to the information contained in the Omnia Finance, LLC (“Omnia” or the “Advisor” - CRD #159820) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the Omnia Disclosure Brochure or this Brochure Supplement, please contact us at (701) 371-4432.

Additional information about Mr. Burian is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

The CEO of Omnia is Sean L. Burian, CFA. Mr. Burian, born in 1969, is a dedicated Portfolio Manager for Client accounts of Omnia. Mr. Burian earned the Chartered Financial Analyst (“CFA”) designation in 1997. Mr. Burian earned a Bachelors Degree in Financial Economics from University of North Dakota in 1992. Additional information regarding Mr. Burian’s employment history is included below.

Employment History:

CEO, Omnia Finance, LLC	04/2010 to Present
EVP, BlackRidge Financial, Inc.	2004 to Present
Owner, SB Productions, LLC	2004 to 2010
SVP Treasury, Community First Bankshares, Inc	1995 to 2004

Item 3 – Disciplinary Information

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

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

However, we do encourage you to independently view the background of Mr. Burian on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **6003206** in the field labeled “Individual CRD Number”.

Item 4 – Other Business Activities

Mr. Burian has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

Item 5 – Additional Compensation

Mr. Burian has additional business activities where compensation is received. These business activities are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

Item 6 – Supervision

Mr. Burian serves as the CEO and Chief Compliance Officer of Omnia. Mr. Burian can be reached at (701) 371-4432.

Omnia has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Omnia. Further, Omnia is subject to regulatory oversight by various agencies. These agencies require registration by Omnia and its employees. As a registered entity, Omnia is subject to examinations by regulators, which may be announced or unannounced. Omnia is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: February 23, 2013

Our Commitment to You

Omnia Finance, LLC ("Omnia") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Omnia (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Omnia provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That Omnia Shares

Omnia works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Omnia's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

Omnia does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (701) 371-4432.