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Form ADV Part 2A – Appendix 1
Wrap Fee Program Brochure
(Texas Regional Bank)
August 24, 2015

This brochure provides clients and prospective clients with information about OBS Financial Services, Inc. and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client.

The contents of this brochure have not been approved or verified by the United States Securities and Exchange Commission (SEC) or any other state or federal governmental authority. While the firm and its associates may be registered with the SEC, it does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Questions relative to the firm, its services, or this wrap fee program brochure may be made to the attention of Ms. Catherine Farley, Chief Compliance Officer, at (419) 482-4500. Additional information about the firm, other advisory firms, or associated investment advisor representatives is available on the Internet at www.adviserinfo.sec.gov.

The investment advisory services offered and any investment vehicles employed are (i) not deposits or other obligations of, nor are they guaranteed by, a financial institution or its affiliate; (ii) are not insured by the Federal Deposit Insurance Corporation (FDIC), National Credit Union Administration (NCUA), National Credit Union Share Insurance Fund (NCUSIF), or any other agency of the United States Government; and (iii) are subject to investment risks, including the possible loss of value. Further description with respect to investment strategies and their potential risks may be found in Item 6 of this brochure.

Item 2 - Material Changes

This is an original filing of the OBS Financial Services, Inc. Form ADV Part 2A-Appendix 1 wrap fee investment brochure designed for exclusive use within the Texas Regional Bank trust and wealth management program.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Investors are also able to download this brochure from the SEC's website: www.adviserinfo.sec.gov or you may contact our firm at (419) 482-4500.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

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Important Information

Throughout this document OBS Financial Services, Inc. shall also be referred to as “the firm,” “firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “you,” “your,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons*. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.).

Item 4 – Services, Fees and Compensation

Description of Our Advisory Firm

OBS Financial Services, Inc. is a Delaware-incorporated entity domiciled in the State of Ohio and has been operating as a registered investment advisor since 2006. Our firm is registered as an investment advisor with the SEC and notice-filed in all US states and the District of Columbia. In addition, our associates may register or meet certain exemptions in jurisdictions in which we conduct investment advisory business. Texas Regional Bank Trust & Wealth Management personnel are associated as independent investment advisor representatives of OBS Financial Services, Inc.

Ownership of OBS Financial Services, Inc. is through OBS Holdings, Inc., which is subsequently owned by WBI OBS Holdings, LLC of Whitehouse, OH. Majority shareholders of WBI OBS Holdings, LLC are Westbridge Investments, LLC and Canandaigua National Bank & Trust.

As of fiscal year-end on December 31, 2014, OBS Financial Services, Inc. had in excess of \$1.84 billion assets under its management.¹ This total represents non-discretionary assets of over \$1.55 billion and discretionary assets of over \$292 million (defined in Item 7).

OBS Financial Services, Inc. offers investment management services through a wrap fee program as described in the following section. We do not provide traditional financial planning services. OBS Financial Services, Inc. provides model portfolio services to a variety of clients. We provide services to financial institutions (trust services departments), to investment advisor firms and their clients, as well as acting as a qualified retirement plan fiduciary pursuant to § 3(38) of the Employee Retirement Income Security Act of 1974 (ERISA).

Description of Services Offered

Our wrap fee program is designed to offer clients the opportunity to obtain professional portfolio management services through access to institutional money managers and their specific investment strategies, as well as brokerage services in support of the account, for an asset-based fee that is based upon the account's assets under management.²

OBS Financial Services, Inc. provides an internet-based electronic interface via a secure website maintained for financial institutions to enable them to view one or more model portfolios into which the financial institution might invest for its clients. If a financial institution decides to invest a client in one or more models, OBS Financial Services, Inc., facilitates the client's investment into that model(s) within a sub-account of a master omnibus account (the "omnibus account") held in the name of the institution who is the sub-custodian utilizing its trust powers, and will take actions necessary, including executing trades, initially, and thereafter to rebalance the subaccount to continue to conform to the model(s) chosen by the financial institution on behalf of their client. The financial institution will have responsibilities with regard to setting up the client subaccount information within OBS Financial Services, Inc.'s system.

¹ Term "assets under management" and rounding to nearest \$100,000 per the SEC's *General Instructions for Part 2 of Form ADV*.

² Other fees and requirements may apply, please refer *Wrap Fees Assessed* in Item 4 for further details.

Exceptions may be made by OBS Financial Services, Inc. to accommodate a client request to maintain other widely held (liquid) securities in an account at the firm's custodian of record. OBS Financial Services, Inc. will not supervise these holdings and they will be deemed in the engagement agreement as "unsupervised assets."

Brokerage and/or custodian services are provided through the institutional services division of National Financial Services LLC and Fidelity Brokerage Services LLC (collectively "Fidelity"), a FINRA and SIPC member.³ Investment management services are offered by a select group of institutional money managers that our firm has determined appropriate for various asset classes or investment strategies that will serve accounts. The client's local representative provides their expertise involving the consultation aspect of the engagement.

Getting Started

The client will be provided with our current wrap fee program brochure that includes reference to material conflicts of interest regarding our firm and its associates. The client will also receive a separate Form ADV Part 2B brochure supplement about the representative who will be assisting them.

Developing Your Investment Plan

The portfolio will be determined by the sub-account holder's/client's investment objectives, time horizon, tolerance for risk, as well as any reasonable account constraints. This is done through a risk questionnaire which assists in generating the client's Investment Policy Statement. Note that any restriction placed on the management of an account may have an effect on its strategy, investment selection and, potentially, the portfolio's investment results.

The client is responsible for promptly notifying their investment advisor representative if there are changes in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising previous recommendations. The client retains discretion over the choice of investment models and is also free to reject the recommendation of entering into the wrap fee program altogether. The individual securities held within an investment model are, however, at the discretion of the portfolio manager.

Wrap Fee Program Portfolio Models

Efficient Frontier Series Description

The Efficient Frontier Series ("EFS") offered through Dimensional Fund Advisors ("DFA") are passively-managed asset class portfolios that focus on reducing risk by diversification among asset classes. The following paragraphs provide a description of each series.

The **DFA/EFS 0/100%** portfolio is to provide investors with a conservative and consistent stream of income with minimal volatility. The investor remains diversified in the bond markets by investing in various asset classes, which are comprised of government and corporate bonds of various quality, geographical region and maturity.

³ Our advisory firm is not, nor required to be, a FINRA or SIPC member. Information about the Financial Industry Regulatory Authority (FINRA) may be found at: www.finra.org. You may learn more about the Securities Investor Protection Corporation (SIPC) and how it serves member firms and the investing public by going to their website at <http://www.sipc.org>.

The **DFA/EFS 20/80%** portfolio provides investors with the opportunity to build wealth through a conservative risk managed approach. With 80% of the portfolio invested in fixed income assets, exposure to the stock market is limited, while the bond markets provide a consistent stream of income for the investor. To keep pace with inflation, the portfolio invests 20% into the stock market, which raises the growth potential over that of a portfolio void of stock exposure.

The **DFA/EFS 40/60%** provides a balanced investment approach with a conservative emphasis. The portfolio has a healthy exposure to the stock market, with 40% of its assets diversified throughout, and is moderated by a strong bond presence. With 60% of the portfolio assets in the bond market, the investor can receive a consistent stream of income with protection from a volatile stock market.

The **DFA/EFS 50/50** Portfolio aims to provide a balance between capital preservation and capital appreciation. With a 50/50 exposure to equity and fixed income, the portfolio is designed for those who are most comfortable with a balanced approach and have a moderate tolerance for investment fluctuations.

The **DFA/EFS 60/40** portfolio provides a fairly balanced investment approach with an emphasis on long-term growth. The portfolio is more resistant to inflation with an increased potential for larger returns. Its 40% bond presence provides income to the investor and helps dampen volatility during a stock market downturn.

The **DFA/EFS 70/30** portfolio provides a sizeable exposure to the stock market, with a more aggressive approach towards increasing growth. There is a small exposure to fixed income, providing marginal income generation and downside protection.

The **DFA/EFS 80/20%** portfolio provides substantial exposure to the global stock market, with an aggressive approach towards growth. A small bond presence is maintained, but income generation and downside protection is limited.

The **DFA/EFS 100/0%** portfolio is the most aggressive portfolio and offers full exposure to the stock market. The DFA/EFS 100/0% portfolio is diversified between domestic and international stocks, with no exposure to the bond markets.

Component Series

The **DFA/EFS Emerging Market Portfolio** is designed to provide exposure to various emerging capital markets and is structured to promote broad diversification and low expenses. The portfolio is engineered to provide consistent exposure to dimensions of returns which have shown to compensate investors for bearing additional risk over time.

The **DFA/EFS Domestic Equity Portfolio** is designed to provide exposure to the U.S. stock market while utilizing a core structure to promote broad diversification and reduced expenses. The portfolio is engineered to provide consistent exposure to dimensions of returns which have shown to compensate investors for bearing additional risk over time.

The **DFA/EFS Developed Equity Portfolio** is designed to provide exposure to various International Developed capital markets and is structured to promote broad diversification and low expenses. The portfolio is engineered to provide consistent exposure to dimensions of returns which have shown to compensate investors for bearing additional risk over time.

Wrap Fees Assessed

Wrap accounts maintained on the Fidelity platform will be assessed an annualized asset-based fee⁴ by OBS Financial Services, Inc. as follows:

Table 1: Standard Services

Assets Under Management	Asset-Based Fee
\$10,000 - \$1,000,000	1.50% (150 basis points)
\$1,000,001 - \$2,000,000	1.25% (125 basis points)
\$2,000,001 - \$3,000,000	1.00% (1.00 basis points)
\$3,000,001 - Above	0.75% (75 basis points)

If OBS Financial Services, Inc. is engaged to serve as an ERISA § 3(38) fiduciary. OBS has various platform options for ERISA § 3(38) fiduciary. The typical fee is noted below, and further details may be provided via your representative.

Table 2: ERISA § 3(38) Services

Assets Under Management	Asset-Based Fee
\$10,000 - \$750,000	0.90% (90 basis points)
\$750,001 - \$5,000,000	0.85% (85 basis points)
\$5,000,001 - \$10,000,000	0.81% (81 basis points)
\$10,000,001 - Above	0.71% (71 basis points)

Discounting Fees

For the benefit of discounting the asset-based fee, we may aggregate accounts for the same individual or two or more accounts within the same family, as well as accounts where a family member has power of attorney over another family member's account. This is called householding fee billing. Should investment objectives be substantially different for any two or more household accounts, requiring different investment approaches or operational requirements, we reserve the right to separately apply our fee schedule.

The services to be provided to you and their specific fees will be detailed in your engagement agreement. Our published fees are negotiable at the discretion of an officer of our firm.

Fee Payment

An annualized asset-based fees will be billed monthly, in arrears, based on the daily average market value of the client's sub-account over the previous month. Fee payments will generally be assessed within the first 10 business days of each billing period. The sub-account's first billing cycle will normally occur once the account is funded and investments allocated, irrespective of a partial period under the firm's management, however, a partial period may be assessed a prorated fee.

⁴ The fee calculation will include "unsupervised assets" and money market positions held at the firm's custodian of record.

Sub-accounts will be valued in accordance with the values disclosed on the client's performance statement the client receives from the performance reporting provider, Orion Advisors.

Termination of Services

Either party may terminate the agreement at any time, which will typically be in writing. If the sub-account holder verbally notifies the advisor of the termination and, if in two business days following this notification a written notice has not been received, OBS will make written notice of the termination in our records and send the sub-account holder our own termination notice as a substitute. Our firm will not be responsible for future allocations or transactional services (except limited closing transactions) upon receipt of a termination notice. It will also be necessary that we inform the custodian of record that the relationship between the firm and the client has been terminated.

If our wrap fee program brochure was not delivered at least 48 hours prior to entering into the investment advisory contract with our firm, then the client will have the right to terminate the engagement without fee or penalty within five business days after entering into the agreement. Should the agreement be terminated after the five-day period, the client will be assessed fees on a prorated basis for services incurred from either (i) as a new client, the date of the engagement to the date of the firm's receipt of the written notice of termination; or (ii) all other accounts, the last billing period to the date of the firm's physical or constructive receipt of written termination notice. OBS Financial Services, Inc. will promptly return any prepaid but unearned advisory fees upon receipt of a termination notice, which we typically coordinate via the custodian of record.

Services Purchased Separately

The total costs associated with a wrap fee program account may be more or less than separately purchasing brokerage and advisory services. The factors that bear upon the relative costs of any wrap fee program include the number of and timing of transactions, referral fees (if any), portfolio management and custody fees; regulatory, compliance and administrative charges; research costs, promotional materials, among others. These and other factors may affect the cost of obtaining these services separately from another provider.

Additional Client Fees

There are typically no sales loads, brokerage fees, mark-ups, mark-downs, spreads paid to market makers, or brokerage termination or account surrender fees associated with our wrap fee program. Although the fees earlier described are for advisory fees payable to our firm, there may be additional fees an account holder may pay when transactions occur in their account. The list of potential fees and expenses below depict what an account holder may pay a custodian, whether the position is being purchased, sold or held in an account.

- Odd-lot differentials
- Accommodation account trading
- Wire transfer and electronic fund processing fees
- Express mailing fees

Typical additional fees are included with the client's new account paperwork or custodian fee schedule. OBS Financial Services, Inc. does not have control over the assessment of these fees.

Compensation Matters

Our advisory firm does not receive additional fees if our wrap fee program is recommended to a client. The client may be assessed additional fees if they choose services separate of OBS Financial Services, Inc.'s wrap fee program. Clients should compare costs between this program and others offered through other providers.

General Information

Custody

Client funds and securities will be maintained at Fidelity; an unaffiliated, qualified custodian. Assets are not maintained by OBS Financial Services, Inc. or any of its associates. In keeping with the firm's policy of not taking physical custody of client funds or securities, we:

- Restrict the firm and associates from acting as trustee for or having general power of attorney over a client account.
- Are prohibited from having authority to withdraw securities or money from a client account, other than the request for payment of advisory fees that is accomplished through a qualified custodian and pursuant a written agreement (termed "constructive custody").
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our advisory firm.
- Will not collect fees of \$1,200 or more for advisory services to be performed six months or more in advance.
- Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts), even for the convenience or accommodation of the client or their legal agent, if such access would result in having control over the account or its assets.

Firm Services

OBS Financial Services, Inc. will use its best judgment and good faith effort in rendering its services to its clients. Our firm cannot warrant or guarantee any particular level of account performance or that accounts will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, the firm will not be liable to an account holder, heirs, or assigns for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by the firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from the firm's adherence to the account holder or their legal agent's direction; or any act or failure to act by a service provider maintaining an account.

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that an account holder may have under federal and state securities laws.

Item 5 – Account Requirements and Types of Clients

Account Requirements

Minimum Account Requirements

Our firm requires a minimum of \$10,000 of investable assets within the wrap fee program in order to open and maintain an account.

Account Opening Process

Participation in the program is initiated by submitting the following completed documents to the firm:

- Investment Management Agreement
- Account Application
- Investment Policy Statement based on a risk questionnaire
- Government issued identification

Based on these completed documents, our firm will make the initial determination as to your suitability for the wrap fee program. We also make an assessment of whether to establish an account for the client based on the appropriate documentation submitted, risk tolerance and asset allocation recommendations.

The client retains discretion over the choice of investment models and is free to reject a recommendation or in entering into the wrap fee program altogether. The individual securities held within an investment model are at the discretion of the portfolio manager.

The custodian for wrap program accounts will be Fidelity for the omnibus account, and they will execute and clear all purchase and sale orders as directed. Fidelity will maintain omnibus account assets and will provide other custodial functions, including crediting of interest and dividends on accounts, and other customary functions. They serve as general administrator for wrap fee program sub-accounts.

Types of Clients Served by the Firm

OBS Financial Services, Inc. provides its services to individual investors, trusts, estates, charitable organizations and foundations, financial institutions, pension and profit sharing plans, and businesses of various scale.

Types of Clients Served within the Program

We generally offer this wrap fee program to individuals, high net worth individuals, trusts, estates, and charitable organizations, however, we will include businesses and pension and profit sharing plans should their investment guidelines permit us to do so. In all instances, OBS Financial Services, Inc. reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or pre-existing relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

Item 6 – Selection and Review of Portfolio Managers

Selection and Review of Portfolio Managers

Our investment committee conducts due diligence on each mutual fund manager. At least annually the investment committee review will be performed from both a compliance and performance perspective to determine whether the selected mutual fund manager remains an appropriate fit. OBS Financial Services, Inc. will also determine if the fund manager should be replaced due to poor performance, regulatory or compliance matters, etc.

The benchmarks for account performance are based on each client's responses to suitability information and their investment statement. Using these responses, the firm is able to select a fund manager felt capable to employ an appropriate investment strategy as well as develop a diversified portfolio using this strategy. Our firm maintains client profiles and may recommend adjustments to portfolios accordingly.

Clients may receive performance reports prepared by OBS Financial Services, Inc. that have been generated using third-party performance reporting software. These reports are calculated using a time-weighted methodology that is intended to inform clients about their investment performance over the current period and since account inception, both on an absolute basis and as compared to a known benchmark. Our performance reports are reviewed for accuracy by client services prior to delivery, as well as periodic back-testing by operations and compliance personnel.

Related Persons Serving as Portfolio Manager

OBS Financial Services, Inc. does not engage an associate of the firm or any other related person to serve as a portfolio manager for its wrap fee program. We believe this type of arrangement poses a conflict of interest and does not conform to our business practices. It will be necessary, however, for OBS Financial Services, Inc. to perform portfolio asset allocation changes for investors based on withdrawals and deposits.

Methods of Analysis, Investment Strategies and Risk of Loss

Method of Analysis

The firm will take into consideration the client's current financial situation, needs, goals, objectives and tolerance for risk. Asset allocation and investment decisions are made in the firm's judgment to meet the client's objectives while minimizing risk exposure. To achieve this, the firm will employ what we believe to be an appropriate blend of *fundamental* and *technical* analyses to develop long-term investment strategies. Fundamental analysis involves evaluating economic factors including interest rates, current state of the economy, future growth of an issuer, or sector, among others. Technical analysis may involve studying securities, markets, or economies as a whole in an effort to determine potential future behaviors.

Our research and recommendations may be drawn from sources that include financial publications, investment analysis and reporting software, research materials from outside sources, corporate rating services, annual reports, prospectuses and other regulatory filings, as well as company press releases.

Investment Strategies

The underlying mutual fund managers OBS Financial Services, Inc. selects to support its model portfolios must generally ascribe to the principles of the Modern Portfolio Theory and a mathematical technique known as “mean variance optimization.” This theory is based on the belief that proper diversification and risk management will provide the account holder with a more stable and consistent return over time. Furthermore, it has been statistically proven that a properly diversified portfolio, consisting of an appropriate weighting in different asset classes, will generally outperform most asset classes over time. The practice of Modern Portfolio Theory does not employ market timing or stock selection methods of investing but rather a long term buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels. Cost-efficient, low-cost mutual funds are recommended for each asset class (see Item 4).

Risk of Loss

While the firm believes its strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, it cannot warrant or guarantee that an investment objective will be achieved. Investing in securities involves risk of loss that a client should be prepared to bear. Some investment decisions made may result in loss, which may include the original principal invested. We have offered examples of such risk in the following paragraphs, and we believe it is important that each prospective investor and/or account holder review and consider each of them risk prior to investing.

Company Risk – When investing in securities, such as stocks, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as *unsystematic risk* and can be reduced or mitigated through diversification.

Financial Risk – Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Firm Research – When research and analyses is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, the firm is relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, market data, and the issuers themselves. The firm makes every effort to determine the accuracy of the information received but it cannot foretell events or actions taken or not taken, or the validity of all information it has researched or provided which may or may not affect the advice to or investment management of an account.

Fundamental Analysis – The challenge involving fundamental analyses is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security’s value. If a security’s price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

Inflation Risk – When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

Management Risk – An investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.

Market Risk – When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called *systemic* or *systematic* risk.

Mutual Fund Risk – The risk of owning a mutual fund generally reflects the risks of owning their underlying securities (e.g., stocks, bonds, etc.). When an investor purchases a mutual fund, that investment may bear additional expenses based on its prorated share of the mutual fund operating expense and certain brokerage fees, which may include the potential duplication of certain fees.

Passive Markets Theory – A portfolio that employs a passive, efficient markets approach (representative of Modern Portfolio Theory) has the potential risk that at times the broader allocation may generate lower-than-expected returns than those from a specific, more narrowly focused asset, and that the return on each type of asset is a deviation from the average return for the asset class. Our firm believes this variance from the “expected return” is generally low under normal market conditions when a portfolio is made up of diverse, low or non-correlated assets.

QDI Ratios – While certain mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods as well as commodities and currencies (that may be part of a mutual fund holding) may be considered “non-qualified” under certain tax code provisions, therefore, the holding’s QDI should be considered if tax-efficiency is an important aspect of the portfolio.

Technical Analysis – The risk of investing based on technical analyses is that it may not consistently predict a future price movement; the current price of a security may reflect all known information. Further, a particular change in the market price of a security may follow a random pattern and may not be as predictable as desired.

Voting Securities

If OBS Financial Services, Inc. receives duplicate correspondence relating to the voting of securities, class action litigation, or other corporate actions, we do not forward such correspondence to the account holder address of record nor return it to its originator.

OBS Financial Services, Inc. does not vote client proxies nor do we offer guidance on how to vote proxies. The owner of record maintains responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by them shall be voted as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the account holder's investment assets.

Our firm will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a account holder account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving account assets.

Item 7 – Client Information Provided to Portfolio Managers

Information Provided to Portfolio Managers

Under our wrap fee engagement, we will gather information about the client and their financial situation, investment objectives, and any reasonable restrictions they may want to impose on the management of the account. We will then utilize this data to establish an asset allocation in support of a portion or the entire portfolio in accordance with the selected investment manager's strategies.

Investment Discretion

As determined by the engagement, we provide our portfolio management services on either a *discretionary* or *non-discretionary* basis. Similar to a limited power of attorney, discretionary authority allows a firm to implement investment decisions, such as the purchase or sale of a security on behalf of an account, without requiring prior client authorization for each transaction in order to meet stated portfolio investment objectives. *Non-discretionary basis* requires a client's ongoing approval involving the investment and reinvestment of account assets.

Under either form of account authority, the client grants trading authorization through the execution of an engagement agreement and custodian of record's account opening documents. Clients are able to amend account authority by providing revised written instructions.

It is important that clients keep their investment representative updated of any change in their situation and/or investment objective so that they may reevaluate previous investment recommendations or portfolio holdings.

OBS Financial Services, Inc. will not serve unsupervised assets (accommodation accounts) on a discretionary basis.

Item 8 – Client Contact with Portfolio Managers

In certain instances a client may be able to attend general communications sessions offered by the underlying mutual fund manager (e.g., DFA). When desiring to communicate with a fund manager, we would ask that our firm serve as coordinator so that we may effectively assist both parties and follow up as necessary.

Item 9 – Additional Information

Disciplinary Information

OBS Financial Services, Inc. and its management have not been subject to a reportable legal or disciplinary event pursuant the Investment Advisers Act of 1940 (as amended) or similar state statute.

Other Financial Industry Activities and Affiliations

Our policies requires that we conduct business activities in a manner that avoid actual or potential conflicts of interest between the firm, employees and our clients, or that may otherwise be contrary to law. We will provide disclosure prior to and throughout the term of an engagement of any conflicts of interest which will or may reasonably compromise our impartiality or independence.

Our firm is not registered nor has an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm, nor are we required to be registered with such entities. Neither our firm nor its management is or has a material relationship with any of the following types of entities:

- accounting firm or accountant
- insurance company or insurance agency
- lawyer or law firm
- real estate broker or dealer
- sponsor or syndicator of limited partnerships
- investment company or other publically traded pooled investment vehicle

Ownership of OBS Financial Services, Inc. is through OBS Holdings, Inc., which is subsequently owned by WBI OBS Holdings, LLC of Whitehouse, OH. Majority shareholders of WBI OBS Holdings, LLC are Westbridge Investments, LLC and Canandaigua National Bank & Trust.

As described in Item 4 of this brochure involving our advisory business and investment models, we will select mutual fund managers (whom are required to be registered investment advisors) whose strategies, services or investment vehicles meet our investment committee criteria.

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

OBS Financial Services, Inc. believes that its business methodologies, ethics rules, and adopted policies are appropriate to eliminate or at least minimize potential material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. It is important to note that no set of rules can anticipate or relieve all potential material conflicts of interest.

Our firm will disclose to its clients any material conflict of interest relating to the firm, its representatives, or any of its associates which could reasonably be expected to impair the rendering of unbiased and objective advice (such as roles described in this section of the brochure or an associate's brochure supplement).

Code of Ethics

Our firm has adopted a Code of Ethics that sets forth the policies of ethical conduct for its personnel and accepts the obligation not only to comply with the mandates and requirements of applicable law and regulation but also to take responsibility to act in an ethical and professionally responsible manner in its professional services and activities. The firm periodically reviews and amends its Code of Ethics to ensure currency, and all firm access persons are required no less than annually to attest to their understanding and adherence. OBS Financial Services, Inc. will provide a copy of its Code of Ethics to any client or prospective client upon request.

Privacy Policy Notice

When required, a copy of the firm's privacy policy notice will be provided to an account holder prior to, or contemporaneously with, the execution of an engagement agreement. The firm will notify its clients annually of its privacy policy and at any time, in advance, if its privacy policy is expected to change.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither the firm nor an associate is authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a “related person” (e.g., associate, an immediate family member, etc.) has a material financial interest, such as in the capacity as an underwriter or advisor to an issuer of securities, etc.

An associate is prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

Personal Trading

OBS Financial Services, Inc. does not trade for its own account (proprietary trading). The firm may make recommendations or take action with respect to investments for its clients that may differ in nature or timing from recommendations made to or actions taken for other clients or related persons, and related persons may buy or sell securities similar to those recommended to clients holders for their accounts. At no time will a related person receive preferential treatment over a client.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading, firm policy may require the utilization of published lists that restrict or prohibit transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm’s Chief Compliance Officer in advance of the transaction in any related person’s account.

Review of Accounts

Schedule for Periodic Review

The client’s representative will periodically review reports provided to the client by the portfolio manager and may contact the client on an annual basis to offer a review of their financial situation and objectives. Our firm will communicate information from the client via their representative to portfolio managers as warranted and will assist parties in understanding and evaluating the services provided by each manager. In certain instances, the client may be able to communicate with their portfolio manager.

Reviews will also be conducted on a macro level by our investment committee and supervisory staff, as well at the client level by the client’s representative. Normally these reviews involve analysis and possible revision of investment strategies and investment allocations, etc.

A copy of a revised investment statement or asset allocation report will be provided to the client upon request.

Review of Client Accounts on Non-Periodic Basis

Each client is encouraged to contact their representative for additional reviews when there are material changes that occur in their financial situation (i.e., change of employment status, receipt of a significant bonus, an inheritance, or other circumstances), or if they prefer to make changes involving their account. A copy of revised asset allocation reports will be provided when appropriate.

Additional reviews by portfolio managers, compliance and/or operations personnel may be triggered by news or research related to a specific holding, a change in our view of the merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector.

Portfolios may be also reviewed for an additional holding or when an increase in a current position is under consideration. Account cash levels above or below what we deem appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

Content of Client Provided Reports and Frequency

Clients will receive performance reports sent from Orion based on the sub-account activity from the custodial omnibus account.⁵ We urge each client to carefully review these performance reports for accuracy and clarity, and to ask questions when something is not clear.

Client Referrals and Other Compensation

Economic Benefit from External Sources and Potential Conflicts of Interest

OBS Financial Services, Inc. may participate in a custodian's institutional programs and we require these same custodians to be used for our wrap fee program accounts for custody and brokerage services. We may receive economic benefit from a custodian in the form of the support products and services they make available to us and other independent investment advisors. There is no direct link between our participation in the program and the investment advice or services we provide our clients.

Our firm receives economic benefits through its participation in the program. These benefits may periodically include the following products and services (provided either without cost or at a discount):

- receipt of duplicate account statements and confirmations
- research related products and tools
- consulting services
- access to a trading desk serving accounts
- the ability to have advisory fees deducted from an account per written agreement
- access to an electronic communications network for order entry and account information
- access to mutual funds with no transaction fees, and to certain institutional money managers; and
- discounts on marketing, research, technology, and practice management products or services provided to our firm by third party vendors

A custodian may also pay for business consulting and professional services received by our firm to assist us in managing and administering our accounts. Some of the products and services may favorably benefit our firm but may not benefit each investor's account, and they may also indirectly benefit accounts not maintained at a noted custodian.

As part of our fiduciary duty we endeavor to put the interests of our clients first. We believe it is also important to mention that the benefit received by our firm from a custodian does not depend on the amount of brokerage transactions directed to that custodian, and we believe our selection of each custodian is in the best interests of our clients since the selection is primarily supported by the scope, quality, and cost of their services -- not just those services that benefit only our firm.

⁵ Reports will typically exclude unsupervised asset (accommodation account holdings) performance.

Advisory Firm Payments for Investor Referrals

Solicitor Engagements

If a prospective client is introduced to OBS Financial Services, Inc. by an unaffiliated solicitor, our firm may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended, and any corresponding state securities law requirements. Our firm will pay this referral fee to the solicitor as long as the account remains with our firm. The costs or fees payable by the account holder for the services provided our firm may be increased as a result of the firm's payments to the solicitor by an amount equal to the amount of the payments by the firm to the solicitor. The solicitor will disclose the nature of their relationship to prospective investors at the time of solicitation and will provide prospective investors with both OBS Financial Services, Inc. Form ADV Part 2A and/or wrap fee brochure in addition to the solicitor's disclosure statement that contains the terms and conditions of the solicitation arrangement, including compensation arrangements.

Financial Institution Referrals

If an advisory associate is concurrently an employee of a financial institution or its subsidiary, that associate may receive or provide referral among those separate entities. Our advisory firm does not compensate for such introductions.

Referrals to Other Professionals

Upon request we may provide referral to various professionals, such as an accountant or an attorney. While these referrals are based on the best information made available, the firm does not guarantee the quality or adequacy of the work provided by these referred professionals. There is not an agreement with these entities nor are referral fees received from these professionals for such informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by our firm.

Industry Memberships

A firm associate may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. The public may also choose to telephone association staff to inquire about an individual within their area, and would receive the same or similar information.

A portion of these participant's membership fees may be used so that their name will be listed in some or all of these entities' websites (or other listings). Prospective clients locating our firm or an associate via these methods are not actively marketed by the noted associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

Financial Information

OBS Financial Services, Inc. will not take physical custody of client assets. Advisory fee withdrawals must be done through each sub-account based on the client written agreement associated with it. The fees are deducted through the trust system.

Our firm will not collect advisory fees from a client of \$1,200 or more for services to be performed six months or more into the future.

Neither the firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair the firm's ability to meet commitments to our clients, nor have they been the subject of a bankruptcy petition at any time during the past 10 years.

Due to the nature of our firm's services and operational practices, an audited balance sheet is not required nor included in this brochure.

Our investment advisory services and investment vehicles offered

Are Not FDIC Insured	Are Not Bank Guaranteed	May Lose Value
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