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Form ADV Part 2A – Appendix 1

Wrap Fee Program Brochure

(Institutional)

February 7, 2019

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 investor.

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 are 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

OBS Financial Services, Inc., previously amended its Form ADV Part 2A - Appendix 1 wrap fee brochure on March 26, 2018; the following material changes have occurred since that filing:

1. Item 4 – OBS has added a disclosure provision about the client’s ability to place restrictions on his or her account. Please see page 5.

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. Prospective investors are also able to download this brochure from the SEC’s website at www.adviserinfo.sec.gov or you may contact our firm at (419) 482-4500.

As with all firm documents, account holders and prospective investors 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 terms “account holder,” “prospective investor,” “client,” “you,” “your,” etc., refers to an 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. We operate under the trade name OBS Financial. In addition, our associates may register or meet certain exemptions in jurisdictions in which we conduct investment advisory business.

Ownership of OBS Financial is through OBS Holdings, Inc., which is subsequently owned by WBI OBS Holdings, LLC of Perrysburg, OH. Majority shareholder of WBI OBS Holdings, LLC is Canandaigua National Bank & Trust.

As of December 31, 2017, OBS Financial managed \$1.918 billion.¹ This total represents non-discretionary assets of \$1.515 billion and discretionary assets of \$748 million (defined in Item 16). As part of its business, OBS Financial also provides model portfolio services, acts as a strategist, effects trade execution and provides other investment management services for clients whose assets total \$345 million. If these additional assets are added to the totals above, as of December 31, 2017, OBS Financial was responsible for \$2.26 billion in total assets.

Our advisory firm offers investment management services through a wrap fee program as described in the following section. We also offer our investment management services involving unbundled fees, and further information involving the program is described in a separate disclosure brochure that is available upon request. OBS Financial does not provide traditional financial planning services.

OBS Financial 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). This brochure is designed for financial institutions who provide trust services and their clients.

Description of Services Offered

Our wrap fee program is designed to offer financial institutions 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 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, facilitates the client's investment into that model(s) within a subaccount 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.

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.

The financial institution will have responsibilities with regard to setting up the client subaccount information within OBS Financials' system.

Brokerage and/or custodian services are provided through Fidelity Institutional Wealth Services. Our custodian offers independent investment advisors various services which may include custody of securities, trade execution, clearance and settlement of transactions. Investment management services are provided by a select group of institutional money managers that our firm has determined appropriate for various asset classes or investment strategies that will serve as sub-advisors to firm accounts. The client's financial institution/investment advisory firm and/or representative may provide their expertise involving the consultation aspect of the engagement.

Getting Started

The financial institution will be provided with our wrap fee program brochure that includes reference to material conflicts of interest regarding our firm and its associates. The financial institution may receive a brochure supplement about their investment advisor representative assisting them.

The financial institution will maintain an omnibus account held at a qualified custodian. The financial institution is free to reject the wrap fee program and participate in an unbundled option offered through OBS Financial. The subaccount holder (which is the client of the financial institution) does not choose between the wrap and unbundled program.

Developing the Investment Plan

The portfolio will be determined by the subaccount holder's investment objectives, time horizon, tolerance for risk, as well as any reasonable subaccount constraints. Within the next sixty days, at account opening, a client will be able to indicate if he/she has any reasonable account restrictions by the use of the Restrictions form with their advisor/trust officer. A client will receive a reminder communication quarterly from their trust department. A client's investment representative will also ask about restrictions during the annual review of the client's account as well. Note that any restriction placed on the management of a subaccount may have an effect on its strategy, investment selection and, potentially, the portfolio's investment results.

The subaccount holder is responsible for promptly notifying their financial institution representative if there are changes in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising previous recommendations. The subaccount holder retains discretion over the choice of investment models. The individual securities held within an investment model are, however, at the discretion of the portfolio manager.

Available 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.

DFA/Efficient Frontier Series – DFA/EFS: The DFA/EFS portfolio series are dynamically managed asset class portfolios that follow the covenants of Modern Portfolio Theory of reducing risk by diversifying among an extensive range of asset classes including, but not limited to, domestic and international

equities, fixed-income securities, and real estate. These portfolios are tilted to have a greater exposure toward small capitalization, value, and highly profitable stocks, in an effort to capture the risk premiums these asset classes have historically displayed.

In an effort to dampen volatility, a high-quality, short-term fixed income strategy is employed within the series. These model portfolios are built using the DFA mutual fund series (institutional share classes).

DFA/Efficient Frontier Series – DFA/EFS Positive (+) Tilt: Using the DFA/EFS Core series as a baseline, these portfolios are constructed in the same manner; however, they are more heavily weighted, or tilted, towards small cap, value, and highly profitable stocks. These portfolios exhibit a greater degree of standard deviation because of this tilting and carry an expectation of a higher return due to the risk premium that small cap and value stocks have historically provided.

DFA/Efficient Frontier Series – DFA/EFS Negative (-) Tilt: This series attempts to reduce the overall volatility in the portfolios by reducing the degree to which the portfolios are tilted towards small cap and value stocks. The portfolios maintain a prudent level of exposure to these asset classes; however, the exposure is less than that which is contained in the DFA/EFS Core or positively titled portfolio series. The series is well diversified while experiencing a lower standard deviation than the core series.

DFA/EFS Enhanced International – DFA/EFS EI: This series of portfolios is constructed in the same manner as the DFA/EFS Core series following the covenants of Modern Portfolio Theory reducing risk by diversifying among an extensive range of asset classes. This series differs from the core series in that it provides additional exposure to foreign equity asset classes (increased from 30% to 40%) to align more closely with the world market capitalization, in an effort to enhance diversification and growth potential provided by foreign markets.

DFA/EFS Socially Responsible Investing Series – DFA/EFS Social: This series is constructed utilizing the DFA series of socially responsible mutual funds. The portfolios employ the same portfolio construction principles as the DFA/EFS Core series; however, a social screening strategy is applied. The screening strategy seeks to exclude investments in companies whose businesses are identified as having exposure to certain forms of health care, the military, human and/or labor rights and the environment.

DFA/EFS Income Portfolio: The overall investment objective of the DFA/EFS Income Portfolio is to maximize total return by providing a steady stream of income to the investor. The portfolio has the ability to invest in a full range of investment grade bonds, while extending term limitations. The investor remains diversified as the portfolio invests in various types of government and corporate issues of varying quality, geography and maturity terms.

DFA/EFS S (Sustainability): The DFA/EFS S Series is a series of portfolios created by OFS Financial Services utilizing Dimensional Fund Advisors series of Sustainability funds. The portfolios employ an investment philosophy that is similar to the DFA/EFS Core Series philosophy with an environmental impact screening strategy applied. The screening seeks to limit investment in certain companies that are identified by environmental impact screens, as reflected in the prospectus. These screens were designed to meet the sustainability investing needs of shareholders.

DFA/EFS Components: The component series utilizes the three main components or major market segments within the DFA/EFS 100/0 portfolio. This portfolio is segregated into three separate portfolios or components based on geographic region. The components consist purely of equities in the US, non-US developed countries, and emerging market countries. These portfolios are tilted to have a greater

exposure toward small capitalization, value, and highly profitable stocks, in an effort to capture the risk premiums these asset classes have historically displayed. The portfolios are highly diversified within their respective market.

Efficient Frontier Model Description

DFA/EFS

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.

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.

DFA EFS + Tilt (+)

The **+20/80%** portfolio provides additional exposure to the US Small Cap and Value asset classes for a more aggressive investment approach. This will provide the potential for greater growth but will also

increase the expected volatility of the overall portfolio over the long term. The +20/80% portfolio provides investors with an 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, and 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 slightly raises the growth potential.

The **+40/60%** portfolio provides additional exposure to the US Small Cap and Value asset classes for a more aggressive investment approach. This will provide the potential for greater growth but will also increase the expected volatility of the overall portfolio. The +40/60% portfolio provides a balanced investment approach, with a touch of conservative emphasis. The portfolio has a healthy exposure to the stock market, with 40% of its assets diversified throughout equity asset classes; however, this exposure is moderated by a strong bond presence. With 60% of the portfolio assets in the bond markets, the investor can receive a consistent stream of income and some protection from a downward stock market.

The **+50/50%** portfolio provides additional exposure to the US Small Cap and Value asset classes for a more aggressive investment approach. This will provide the potential for greater growth but will also increase the expected volatility of the overall portfolio. The +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 an average tolerance for investment fluctuations.

The **+60/40%** portfolio provides additional exposure to the US Small Cap and Value asset classes for a more aggressive investment approach. This will provide the potential for greater growth but will also increase the expected volatility of the overall portfolio. The +60/40% portfolio provides a fairly balanced investment approach with an emphasis on growth. The portfolio is more resistant to inflation with an increased potential for capital appreciation. Its 40% bond presence provides income to the investor, as well as market downturn protection.

The **+70/30%** portfolio provides additional exposure to the US Small Cap and Value asset classes for a more aggressive investment approach. This will provide the potential for greater growth but will also increase the expected volatility of the overall portfolio. The +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 limited income generation and downside protection.

The **+80/20%** portfolio provides additional exposure to the US Small Cap and Value asset classes for a more aggressive investment approach. This will provide the potential for greater growth but will also increase the expected volatility of the overall portfolio. The +80/20% portfolio provides almost complete exposure to the stock market, with an aggressive approach towards increasing growth. A small bond presence is maintained, but income generation and downturn protection is limited.

The **+100/0%** portfolio provides additional exposure to the US Small Cap and Value asset classes for a more aggressive investment approach. This will provide the potential for greater growth but will also increase the expected volatility of the overall portfolio. The +100/0% portfolio is the most aggressive portfolio and offers full exposure to the stock market. The +100/0% portfolio is also diversified between domestic and international stocks, with no exposure to the bond markets.

DFA EFS - Tilt (-)

The **-20/80%** portfolio provides reduced exposure to the US Small Cap and Value asset classes for a less aggressive investment approach. This will slightly reduce the potential for greater growth but will also decrease the expected volatility of the overall portfolio over the long term. The -20/80% portfolio provides investors with an 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 and 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 slightly raises the growth potential.

The **-40/60%** portfolio provides reduced exposure to the US Small Cap and Value asset classes for a less aggressive investment approach. This will slightly reduce the potential for greater growth but will also decrease the expected volatility of the overall portfolio over the long term. The -40/60% portfolio provides a balanced investment approach, with a touch of conservative emphasis. The portfolio has a healthy exposure to the stock market, with 40% of its assets diversified throughout equity asset classes; however, this exposure is moderated by a strong bond presence. With 60% of the portfolio assets in the bond markets, the investor can receive a consistent stream of income and some protection from a downward stock market.

The **-50/50%** portfolio provides reduced exposure to the US Small Cap and Value asset classes for a less aggressive investment approach. This will slightly reduce the potential for greater growth but will also decrease the expected volatility of the overall portfolio over the long term. The -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 an average tolerance for investment fluctuations.

The **-60/40%** portfolio provides reduced exposure to the US Small Cap and Value asset classes for a less aggressive investment approach. This will slightly reduce the potential for greater growth but will also decrease the expected volatility of the overall portfolio over the long term. The -60/40% Portfolio provides a fairly balanced investment approach with an emphasis on growth. The portfolio is more resistant to inflation with an increased potential for capital appreciation. Its 40% bond presence provides income to the investor, as well as market downturn protection.

The **-70/30%** portfolio provides reduced exposure to the US Small Cap and Value asset classes for a less aggressive investment approach. This will slightly reduce the potential for greater growth but will also decrease the expected volatility of the overall portfolio over the long term.

The **-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 limited income generation and downside protection.

The **-80/20%** portfolio provides reduced exposure to the US Small Cap and Value asset classes for a less aggressive investment approach. This will slightly reduce the potential for greater growth but will also decrease the expected volatility of the overall portfolio over the long term. The -80/20% portfolio provides almost complete exposure to the stock market, with an aggressive approach towards

increasing growth. A small bond presence is maintained, but income generation and downturn protection is limited.

The **-100/0%** portfolio provides reduced exposure to the US Small Cap and Value asset classes for a less aggressive investment approach. This will slightly reduce the potential for greater growth but will also decrease the expected volatility of the overall portfolio over the long term. The -100/0% portfolio is the most aggressive portfolio and offers full exposure to the stock market. The -100/0% portfolio is also diversified between domestic and international stocks, with no exposure to the bond markets.

DFA/EFS Socially Responsible (SR)

The **DFA/EFS SR 60/40%** portfolio provides a fairly balanced investment approach with an emphasis on growth. The portfolio is more resistant to inflation with an increased potential for capital appreciation. Its 40% bond presence provides income to the investor, as well as market downturn protection. The portfolio seeks to exclude investment from certain companies that are identified by the portfolio's social screens, as reflected in the prospectus. These screens were designed to meet the social investing needs of shareholders.

The **DFA/EFS SR 80/20%** portfolio provides almost complete exposure to the stock market, with an aggressive approach towards increasing growth. A small bond presence is maintained, but income generation and downturn protection is limited. The portfolio seeks to exclude investment from certain companies that are identified by the portfolio's social screens, as reflected in the prospectus. These screens were designed to meet the social investing needs of shareholders.

The **DFA/EFS SR 100/0%** portfolio is the most aggressive portfolio and offers full exposure to the stock market. The 100/0% portfolio is also diversified between domestic and emerging market stocks, with no exposure to the bond markets. The portfolio seeks to exclude investment from certain companies that are identified by the portfolio's social screens, as reflected in the prospectus. These screens were designed to meet the social investing needs of shareholders.

DFA/EFS Enhanced International (EI)

The **DFA/EFS EI 0/100%** portfolio provides investors with a conservative and consistent stream of income, while providing inflation protection through the utilization of inflation protected securities. The investor remains diversified by investing in various asset classes, which are comprised of government and corporate bonds of various quality, geographical region and maturity.

The **DFA/EFS EI 20/80%** portfolio provides additional exposure to foreign equity asset classes to align more closely with the world market capitalization, in an effort to increase diversification and growth potential provided by foreign markets. The portfolio also includes inflation protected securities to combat inflation over the long term. The 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, and 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 EI 40/60%** portfolio provides additional exposure to foreign equity asset classes to align more closely with the world market capitalization, in an effort to increase diversification and growth potential provided by foreign markets. The portfolio also includes inflation protected securities to

combat inflation over the long term. The portfolio 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 and some protection from a volatile stock market.

The **DFA/EFS EI 50/50%** portfolio provides additional exposure to foreign equity asset classes to align more closely with the world market capitalization, in an effort to increase diversification and growth potential provided by foreign markets. The portfolio also includes inflation protected securities to combat inflation over the long term. The 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 EI 60/40%** portfolio provides additional exposure to foreign equity asset classes to align more closely with the world market capitalization, in an effort to increase diversification and growth potential provided by foreign markets. The portfolio also includes inflation protected securities to combat inflation over the long term. The portfolio provides a fairly balanced investment approach with an emphasis on 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 EI 70/30%** portfolio provides additional exposure to foreign equity asset classes to align more closely with the world market capitalization, in an effort to increase diversification and growth potential provided by foreign markets. The portfolio also includes inflation protected securities to combat inflation over the long term. The 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 EI 80/20%** portfolio provides additional exposure to foreign equity asset classes to align more closely with the world market capitalization, in an effort to increase diversification and growth potential provided by foreign markets. The portfolio also includes inflation protected securities to combat inflation over the long term. The 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 EI 100/0%** portfolio provides additional exposure to foreign equity asset classes to align more closely with the world market capitalization, in an effort to increase diversification and growth potential provided by foreign markets. The 100/0% portfolio is the most aggressive portfolio and offers full exposure to the stock market. The portfolio is diversified between domestic and international stocks, with no exposure to the bond markets.

DFA/EFS Retirement Series

The **DFA/EFS Retirement 0/100%** portfolio is to maximize total return by providing a steady stream of income to the investor. The portfolio has the ability to invest in a full range of investment grade bonds with extended maturities. The investor remains diversified by investing in various types of government and corporate issues of diverse quality, geographical region, and maturity.

The **DFA/EFS Retirement 20/80%** portfolio provides investors with an opportunity to build wealth through a conservative risk managed approach, while using a full core strategy to reduce expenses and trade costs. With 80% of the portfolio invested in fixed income assets, exposure to the stock market is limited, and 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 slightly raises the growth potential.

The **DFA/EFS Retirement 40/60%** provides a balanced investment approach with a conservative emphasis, while using a full core strategy to reduce expenses and trade costs. 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 Retirement 50/50%** portfolio aims to provide a balance between capital preservation and capital appreciation, while using a full core strategy to reduce expenses and trade costs. 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 Retirement 60/40%** portfolio provides a fairly balanced investment approach with an emphasis on long-term growth, while using a full core strategy to reduce expenses and trade costs. 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 Retirement 70/30%** portfolio provides a sizeable exposure to the stock market, with a more aggressive approach towards increasing long-term growth, while using a full core strategy to reduce expenses and trade costs. There is a small exposure to fixed income, providing marginal income generation and downside protection.

The **DFA/EFS Retirement 80/20%** portfolio provides substantial exposure to the global stock market, with an aggressive approach towards long-term growth, while using a full core strategy to reduce expenses and trade costs. A small bond presence is maintained, but income generation and downside protection is limited.

The **DFA/EFS Retirement 90/10%** portfolio is the most aggressive portfolio and offers the largest exposure to the stock market in an effort to promote long-term capital appreciation, while using a full core strategy to reduce expenses and trade costs. The DFA/EFS 90/10 portfolio is diversified between domestic and international stocks, with minimal exposure to the bond markets.

DFA/EFS Income

The overall investment objective of the DFA/EFS Income portfolio is to maximize total return by providing a steady stream of income to the investor. The portfolio has the ability to invest in a full range of investment grade bonds with extended maturities. The investor remains diversified by investing in various types of government and corporate issues of diverse quality, geographical region, and maturity.

DFA/EFS S

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

exposure to the bond markets. The portfolio seeks to exclude investments in certain companies that are identified by the portfolio's environmental impact screens, as reflected in the prospectus. These screens were designed to meet the sustainability investing needs of investors.

The **DFA/EFS S 80/20%** portfolio provides significant exposure to the stock market, with an approach focused on growth. A small bond presence is maintained, but income generation and downturn protection is limited. The portfolio seeks to exclude investments in certain companies that are identified by the portfolio's environmental impact screens, as reflected in the prospectus. These screens were designed to meet the sustainability investing needs of investors.

The **DFA/EFS S 60/40%** portfolio provides a fairly balanced investment approach with an emphasis on growth. The portfolio is more resistant to inflation with an increased potential for capital appreciation. Its 40% bond presence provides income to the investor, as well as market downturn protection. The portfolio seeks to exclude investments in certain companies that are identified by the portfolio's environmental impact screens, as reflected in the prospectus. These screens were designed to meet the sustainability investing needs of investors.

Target Date Efficient Frontier Series (TD/EFS) (Closed)

The TD/EFS portfolio series are dynamically managed target date portfolios that follow the covenants of Modern Portfolio Theory of reducing risk by diversifying among a broad range of asset classes including, but not limited to, domestic and international equities and fixed income securities and may include exposure to the REIT market. These portfolios are tilted to have a greater exposure toward small capitalization and value stocks to capture the premium these asset classes have historically displayed. The TD/EFS is a series of portfolios designed to assist investors on their path to retirement by dynamically altering the asset allocation. As the investor approaches retirement, the portfolio will automatically become more conservative.

TD/EFS Balanced Income – The Target Date/EFS Balanced Income Portfolio is designed for investors already in retirement. This is the most conservative of the Target Date/EFS Portfolios. It is designed to provide a constant stream of income through fixed income holdings while still moderately growing through equity allocations.

All other Target Date/EFS Portfolio allocations eventually mirror the Balanced Income Portfolio.

The **TD/EFS 2010** portfolio is designed for people planning on retiring in 2010 and up to 10 years after January 2010. Over time, this portfolio will slowly change to a more conservative allocation by replacing a portion of equity with fixed income every five years. In the year 2010, this portfolio will mirror the current allocation of the TD Balanced Income Portfolio.

The **TD/EFS 2020** portfolio is designed for people planning on retiring in 2020 and up to 10 years after January of 2020. Over time, this portfolio will slowly change to a more conservative allocation by replacing a portion of equity with fixed income every five years. In the year 2020, this portfolio will mirror the current allocation of the Target Date Balanced Income Portfolio.

The **TD/EFS 2030** portfolio is designed for people planning to retire in 2030 and up to 10 years after January 2030. Over time, this portfolio will slowly change to a more conservative allocation by replacing

a portion of equity with fixed income every five years. In the year 2030, this portfolio will mirror the current allocation of the Target Date Balanced Income Portfolio.

The **TD/EFS 2040** Portfolio is designed for people planning to retire in 2040 and up to 10 years after January 2040. Over time, this portfolio will slowly change to a more conservative allocation by replacing a portion of equity with fixed income every five years. In the year 2040, this portfolio will mirror the current allocation of the Target Date Balanced Income Portfolio.

The **TD/EFS 2050** Portfolio is designed for people planning on retiring in 2050 and up to 10 years after January of 2050. Over time, this portfolio will slowly change to a more conservative allocation by replacing a portion of equity with fixed income every five years. In the year 2050, this portfolio will mirror the current allocation of the Target Date Balanced Income Portfolio.

Tax-Advantage – OBS/TA

The **OBS/TA** portfolio series are tax-efficient, dynamically managed asset class portfolios that follow the covenants of Modern Portfolio Theory of reducing risk by diversifying among an extensive range of asset classes including, but not limited to, domestic and international equities and fixed-income securities. These portfolios are tilted to have a greater exposure toward small capitalization, value, and highly profitable stocks, in an effort to capture the risk premiums these asset classes have historically displayed. The series implements tax advantageous fund management while also utilizing tax-sensitive securities, like municipal bonds. These model portfolios are built using the Dimensional Fund Advisors (DFA) mutual fund series (Institutional Share classes).

The **OBS/TA 0/100%** portfolio is designed for investors with high tax sensitivity and a conservative risk tolerance. It is designed to provide income not subject to AMT and exempt from Federal income tax. The portfolio invests in municipal securities across the nation with an emphasis on states with lower and no income tax.

The **OBS/TA 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. 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 portfolio implements tax efficient fund management while also utilizing tax-sensitive securities, such as municipal bonds.

The **OBS/TA 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 municipal bond presence. The portfolio implements tax efficient fund management while also utilizing tax-sensitive securities, such as municipal bonds.

The **OBS/TA 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 portfolio implements tax efficient fund management while also utilizing tax-sensitive securities, such as municipal bonds.

The **OBS/TA 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 helps dampen volatility during a stock market downturn. The portfolio implements tax efficient fund management while also utilizing tax-sensitive securities, such as municipal bonds.

The **OBS/TA 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 downside protection. The portfolio implements tax efficient fund management while also utilizing tax-sensitive securities, such as municipal bonds.

The **OBS/TA 80/20%** portfolio provides substantial exposure to the global stock market, with an aggressive approach towards growth. A small bond presence is maintained, but downside protection is limited. The portfolio implements tax efficient fund management while also utilizing tax-sensitive securities, such as municipal bonds.

The **OBS/TA 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. The portfolio implements tax efficient fund management for investors who are tax-sensitive.

DFA/EFS Component Series

DFA/EFS International Developed Equity - The DFA/EFS Developed Equity Portfolio is designed to provide full 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 these additional risk over time.

DFA/EFS Emerging Market - The DFA/EFS Emerging Market Portfolio is designed to provide full 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 these additional risk over time.

DFA/EFS Domestic Equity - The DFA/EFS Domestic Equity Portfolio is designed to provide full 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 these additional risk over time.

Customized Portfolios

In limited situations, an account may be customized by select staff; incorporating assets outside standard portfolio models earlier noted.

Wrap Fees Assessed

Asset-Based Fee

Financial institutions have an annualized asset-based fee for trading, as well as a management fee assessed by OBS Financial, who is the sub-advisor to the institution, for utilizing its model portfolios that will be charged on a monthly or quarterly basis which will be determined by the financial institution's billing cycle. Financial institutions may elect to charge the end-client their own fee for their servicing of the end-client's account, this fee may be charged through OBS Financials' system or through the institution's own systems which OBS Financial would not have any knowledge of. Financial institutions may select to either have their management fee charged based on the individual subaccount level or have the management fee based on the total assets in the aggregate with respect to the omnibus account. The following fee schedules apply:

Individual Account Management Fee for Omnibus Account

Calculate the fee on a per-account basis using average daily balance market values at the end of the billing period.

Table 1: Individual-Level Account Management Fee

Assets Under Management	Asset-Based Fee*
\$10,000 - \$500,000	35 bps
\$500,001 - \$750,000	30 bps
\$750,001 - \$5,000,000	25 bps
\$5,000,001 - \$10,000,000	15 bps
\$10,000,001 – Above	10 bps

*Fees are non-retroactive using individual pricing (e.g., first \$500,000 at 35 bps, next \$250,000 at 30 bps).

Omnibus Account Management Fee for Entire Account

Calculate the fee on the omnibus account total market value using average daily balance market values at the end of the billing period.

Table 2: Omnibus-Level Account Management Fee

Assets Under Management	Asset-Based Fee*
\$10,000 - \$15,000,000	35 bps
\$15,000,001 - \$25,000,000	33 bps
\$25,000,001 - \$50,000,000	31.5 bps
\$50,000,001 - \$75,000,000	26 bps
\$75,000,001 - \$100,000,000	24.5 bps
\$100,000,001 – Above	20 bps

*Fees are retroactive (tiered) using omnibus pricing.

For the overall trading and technology interfaces, the financial institution may be charged based on the schedule below:

Table 3: Asset-Based Pricing Schedule

Assets Under Management	Asset-Based Fee
\$0 - \$1,000,000	10 bps
\$1,000,000 - \$2,000,000	8 bps
\$2,000,000 - \$3,000,000	6 bps
\$4,000,000 - \$25,000,000	4 bps
\$25,000,000 - \$50,000,000	3.5 bps

Note: Whether the financial institution chooses individual or omnibus-level account, asset-based pricing is based on the entire omnibus account value.

OBS Financial utilizes a range of fee schedules and has financial institutions at a variety of asset levels. Because of this, the asset-based trading and technology fee does not follow the same tiers as our firm's management fee pricing schedule. We may also develop customized pricing for certain clients based on unique circumstances.

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

Fee Payment

The financial institution will pay OBS Financial the management fee as well as the asset-based trading fee on either a monthly or quarterly basis as noted in the billing schedule identified within its agreement with our firm. For any partial billing periods, the management fee will be based upon the average daily market value for the days a subaccount has been open during that partial period. All assets in a subaccount, including money market assets, are included within the management fee calculation. The asset-based fee will be based upon the average daily market values for the number of days an omnibus account has been open during the period.

Omnibus account fees are assessed based on the values provided by the custodian of record. OBS Financial receives security pricing into its trust accounting software that calculates billing. In the absence of a reportable market value, our firm may seek an independent third-party opinion or a good faith determination by a qualified associate.

An invoice for the management fee and asset-based trading fee will be provided to financial institution no later than the seventh business day of the month following the end of each billing period, as selected by financial institution in its agreement. Payment must be made to OBS Financial by the 20th calendar day of the month following the end of each billing period. Should the seventh and/or 20th calendar day fall on a weekend or non-market holiday, the deadline will default to the next successive business day.

The omnibus account holder will be required to authorize in writing the selected broker/dealer or custodian (collectively, "service provider") to deduct advisory fees, any applicable transaction charges, etc., from their account and those fees will be noted on statements and confirmations.

The omnibus account holder should note that they share in the responsibility to verify the accuracy of fee calculations; the custodian may not verify the accuracy of the fees assessed.

Termination of Services

Either party may terminate the agreement, in writing, at any time. The notice from either party will be 180 days in advance of the termination date. If our wrap fee program brochure was not delivered to the omnibus account holder at least 48 hours prior to entering into the sub-advisory contract, then the account holder has the right to terminate the engagement without fee or penalty within five business days after entering into the agreement. If the agreement is terminated after the five-day period, the account will be assessed fees on a prorated basis for services incurred from either (i) as a new account holder, 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. It is important to note that once an account has begun the transfer process, it then becomes restricted/frozen at the custodian until the transfer is complete to the receiving custodian designated by the account holder. This means transactions cannot be processed within an account. The transfer process can take several weeks.

Services Purchased Separately

The total costs associated with a wrap fee investment 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 Account 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. Note that programs requiring volume trading may be assessed a pre-negotiated trading fee.

Although the fees earlier described are for advisory fees payable to our firm, there may be additional fees a subaccount holder may pay when transactions occur in their account. The list of potential fees and expenses below depict what a subaccount holder may pay a custodian, whether the position is being purchased, sold or held in an account.

- Exchange fees
- SEC regulatory fees
- Advisory and administrative fees charged by mutual funds and exchange-traded funds (ETFs)
- Custodial fees
- Wire transfer and electronic fund processing fees
- Termination fees
- Express mailing fees
- Others as disclosed on statements or confirmations when or as required

A financial institution may request OBS Financial generate Form 1099-Rs and performance- related reports. If a financial institution selects this option, OBS Financial typically assesses an \$85 per subaccount fee. Other costs a financial institution may incur might include custodial fees, wire fees and overnight mailing charges. When executing the agreement with our firm, the financial institution acknowledges, and acknowledges that it has advised its own clients, that assets might be subject to other additional fees and expenses as may be set forth in the prospectuses for the mutual funds in which the subaccount assets are invested.

Compensation Matters

There is no additional compensation or incentive paid to an associate of OBS Financial when a financial institution chooses a wrap fee investment program over unbundled services offering.

General Information

Custody

Wrap fee program accounts and their holdings will be maintained at an unaffiliated, qualified custodian. Assets are not maintained by OBS Financial or any of its associates. In keeping with the firm's policy of not taking physical custody of an account's funds or securities, we:

- Restrict the firm and associates from acting as trustee for or having general power of attorney over an account holder's account.
- Are prohibited from having authority to withdraw securities or money from an account, other than the request for payment of advisory fees that is accomplished through a qualified custodian and pursuant to a written agreement (termed "constructive custody").
- Do not accept or forward clients' 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 an account holder's access information (i.e., online 401(k), brokerage or bank accounts), even for the convenience or accommodation of the account holder or their legal agent, if such access would result in having control over the account or its assets.

OBS Financial is deemed to have custody due to assets in accounts for which Advisor has the authority to transfer funds via standing letter of automation (SLOA). These transfer authorizations meet the requirements of the SEC's February 21, 2017 No Action Letter on Custody.

Trade Errors

The firm corrects its trade errors through an account maintained by our custodian, and the firm or advisor may be responsible for trading error losses that occur within a client account. Should a gain occur, it may be netted against past losses. Gains created as a result of trading errors will be swept into a designated account maintained by our custodian and subsequently donated to a charity of our choosing. The charity will not have any affiliation or relation to OBS Financial.

Firm Services

OBS Financial 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 Investors

Account Requirements

Minimum Account Requirements

Our firm requires a minimum account size of \$10,000 per financial institution subaccount within the wrap fee program.

Account Opening Process

OBS Financial requires financial institutions to establish an omnibus account with Fidelity. The financial institution must complete the Fidelity new account paperwork and supply any necessary documents (e.g., corporate resolutions, operating agreement, etc.). OBS Financial also requires the client to sign a Model Portfolio Agreement (Sub-Advisory Agreement) and to select account billing options. The financial institution will have their own paperwork and procedures for their clients' subaccounts. Based on these completed documents, our firm will make the initial determination as to the prospective investor's suitability for the wrap fee program. We also make an assessment of whether to establish an omnibus account based on the appropriate documentation submitted.

The custodian for the account will be stated in the investment management agreement, and that custodian will execute and clear purchase and sale orders as directed; and they will maintain wrap fee program account assets and provide other custodial functions, including crediting of interest and dividends on accounts, and other customary functions. They may also serve as general administrator for wrap fee program accounts, which may include collecting advisory fees, processing and reporting deposits to and withdrawals from program accounts, etc. As custodian, they will also forward confirmations for each purchase and sale directly to the account holder as well as to our firm. In addition, the custodian of record will forward monthly account statements to the account holder for each month in which account activity occurs, and at least quarterly regardless of account activity.

Types of Persons Served by the Firm

OBS Financial generally 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 Persons Served within this Program

We offer our institutional wrap fee program to financial institutions for their end-clients who are individuals, high net worth individuals, trusts, estates, and charitable organizations, as well as businesses and pension and profit sharing plans. In all instances, OBS Financial 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 investor 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 will also determine if the fund manager should be replaced due to poor performance, regulatory or compliance matters, etc.

The benchmarks for subaccount performance are based on each investor's responses to firm suitability information and their investment guidelines. Using these responses, the firm is able to select an investment manager felt capable to employ an appropriate investment strategy as well as develop a diversified portfolio using this strategy.

Subaccount holders will typically receive written performance evaluation reports each quarter from their financial institution. OBS Financial does not validate the reports provided by the financial institution to subaccount holders and cannot attest as to whether they are calculated on a uniform and consistent basis.

Related Persons Serving as Portfolio Manager

OBS Financial will not engage an associate of our 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 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 financial institution will take into consideration the subaccount holder's current financial situation, needs, goals, objectives and tolerance for risk. Asset allocation and investment decisions are made by the firm in order to meet the subaccount holder's objectives while minimizing risk exposure. To assist the financial institution to achieve this, OBS Financial will employ what the firm believes to be an appropriate blend of *fundamental* and *technical* analyses to develop its investment strategy. Fundamental analysis involves evaluating economic factors including interest rates, current state of the economy, and 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 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 subaccount holders 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.

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.

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 fall, it can cause the prices of individual stocks to fall indiscriminately. This is also called *systemic* or *systematic* risk.

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 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 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

The financial institution is responsible for gathering information about the subaccount holder which may include their financial situation, investment objectives, and any reasonable restrictions involving the management of the account. This data will then be provided to OBS Financial to allocate holdings in accordance with the investment manager’s published strategies (Item 4). The subaccount holder is unable to communicate directly with mutual fund portfolio manager.

Investment Discretion

OBS Financial provides institutional accounts its investment management services on a *nondiscretionary basis*. Ongoing approval involving the investment and reinvestment of account assets will be required. Note that the custodian of record will typically limit our firm's authority within an account to the placement of trade orders and the request for the deduction of advisory fees.

The omnibus account holder or their attorney-in-fact grants trading authorization through the execution of an engagement agreement and custodian of record's account opening documents. Account holders are able to amend account authority by providing revised written instructions. It is important that subaccount holders keep their institutional representative updated of any change in their situation and/or investment objective so that they may reevaluate previous investment recommendations or portfolio holdings.

Item 8 - Client Contact with Portfolio Managers

In certain instances, the financial institution may be able to attend general communications sessions offered by the underlying mutual fund manager (e.g., DFA) as well communicate with the various managers serving an account. 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 has not been subject to a reportable legal or disciplinary event. OBS Financial's CEO/President, John Henry, without admitting or denying findings, submitted a letter of Acceptance, Waiver and Consent (AWC) to the Financial Industry Regulatory Authority (FINRA), which was accepted by FINRA on June 20, 2016. The AWC acknowledged that Mr. Henry, while serving as the CEO of OBS Brokerage Services Inc., a former affiliate of OBS Financial, failed to make the certifications required by FINRA Rule 3130 in 2011 and 2012. Mr. Henry completed documents prepared by the former brokerage firm's chief compliance officer reflecting its annual compliance meeting, and these documents had been determined by FINRA to not adequately address the testing and verification of the former brokerage firm's supervisory system as required by FINRA Rule 3130.

The certifications referred to having processes in place to establish, maintain and review the former brokerage firm's compliance policies and written supervisory procedures, and to have a report of the testing and verification of the same. The AWC reflects Mr. Henry's consent to a censure and a \$10,000 fine.

Other Financial Industry Activities and Affiliations

Our policies require 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 is through OBS Holdings, Inc., which is subsequently owned by WBI OBS Holdings, LLC of Perrysburg, OH. Majority shareholder of WBI OBS Holdings, LLC is Canandaigua National Bank & Trust.

As described in Item 4 of this brochure involving our advisory business and investment models, we will select 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 Transactions and Personal Trading

OBS Financial 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 will provide a copy of its Code of Ethics to any client or prospective client upon request.

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 in advance if its privacy policy is expected to change.

Investment Recommendations Involving Material Financial Interests

Neither the firm nor an associate is authorized to recommend to a client, or effect a transaction for an account holder, 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 they are an approved lending institution.

Personal Trading

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

Scheduled Reviews

The omnibus account holder's representative may periodically review reports provided to them by the portfolio manager and may contact the account holder to offer a review of their financial situation and objectives. Our firm will communicate information from the account holder via their representative to portfolio managers as warranted and will assist parties in their understanding and evaluating the services provided by each manager. In certain instances, account holders may be able to communicate with the portfolio manager.

Reviews will also be conducted on a macro level by our investment committee and supervisory staff. Normally these reviews involve analysis and possible revision of investment strategies and investment allocations, etc.

A copy of a revised investment guidelines or asset allocation reports will be provided to the account holder and/or their representative upon request.

Non-Periodic Reviews

Subaccount holders are encouraged to contact their representative for additional reviews when there are material changes that have occurred in their financial situation (i.e., change of employment status, receipt of a significant bonus, an inheritance, or other circumstances), or if they prefer changes involving an 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 investor's stated tolerance for risk and investment objectives, may also trigger a review.

Content of Reports and Frequency

Omnibus account holders will receive statements sent directly from the custodian of record where their investments are maintained. We urge each omnibus account holder to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear. Any person receiving written portfolio performance reports from any source are urged to carefully review and compare account statements that they have received from their custodian.

Investor Referrals and Other Compensation

Economic Benefit from External Sources and Potential Conflicts of Interest

OBS Financial participates in various custodians' institutional services program and we require our clients use a specific custodian for our wrap fee program account holders for custody and execution services. We 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 their program. We may also receive periodic referrals from a custodian, however, such introductions are not a factor in our selection of a custodian. 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 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 them, and we believe our selection of a 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.

Advisory Firm Payments for Investor Referrals

Solicitor Engagements

If a prospective client is introduced to OBS Financial 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 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.

OBS Financial has entered into a revenue sharing agreement with the trust portfolio management software providers, in which our firm pays 0.03% (3 bps) per annum of reportable assets under management for those accounts referred to us by various trust systems.

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 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 investors) 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 investors locating our firm or an associate via these methods are not actively marketed by the noted associations. They do not pay more for their services than other investors referred to us in another fashion, such as by an account holder. We do not pay these entities for referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

Financial Information

OBS Financial will not take physical custody of client assets. Advisory fee withdrawals must be done through a qualified intermediary (e.g., custodian of record) per prior written agreement.

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 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.