

Item 1 Cover Page  
**DISCLOSURE BROCHURE**



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**DECEMBER 2024**

This brochure provides information about the qualifications and business practices of Assured Retirement Financial Group, Inc. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 952-657-7470. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Assured Retirement Financial Group, Inc. (CRD #179516) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2: Material Changes**

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### **Annual Update**

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

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### **Material Changes since the Last Update**

This update is in accordance with the required annual update for Investment Advisors. Since the last update of this brochure on December 4, 2023, the following material changes have been made:

- Item 4 has been updated with the firm's most recent assets under management calculation.
  - Outside business activities for Vince Oldre have been updated.
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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

## Item 3: Table of Contents

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## Item 4: Advisory Business

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### Firm Description

Assured Retirement Financial Group, Inc. doing business as CFG Retirement (“CFG Retirement”) was founded in 2015. Vincent L. Oldre is 100% owner.

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### Types of Advisory Services

#### ASSET MANAGEMENT

CFG Retirement offers discretionary asset management services through the utilization of sub-advisors and/or co-advisors to advisory Clients. CFG Retirement will not manage any Client accounts outside of the sub-advisor or co-advisors.

CFG Retirement will provide the following services when recommending services provided by sub-advisors and/or co-advisors:

- Refer persons it believes are suitable and appropriate to one or more of the provided programs and provide certain ongoing services to Clients.
- Customize the Client’s Portfolios (either through the designation of asset allocations, the selection of portfolios, funds and strategies for each investment category in the Portfolio or a combination of the foregoing).
- Obtain information regarding the Client’s investment history and profile in order to understand the Client’s investment needs and objectives, reasonable restrictions and risk tolerance, and other relevant information, used to generate a proposal through the Platform for a recommended Portfolio for the Client.
- On behalf of the Client, designate allocations and select portfolios, funds and strategies for each investment category in the proposal or Portfolio, and make adjustments to the proposed Portfolio as appropriate and consistent with the agreement of the Client.
- Verify at least annually whether the Client’s investment objectives or other financial needs have changed and notify sub-advisor/co-advisors of any changes that need to be made to a Client account.
- CFG Retirement has full discretion to make changes with regard to the management of the account as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and CFG Retirement.

Sub-Advisors execute trades on behalf of CFG Retirement in Client accounts. CFG Retirement will be responsible for the overall direct relationship with the Client. CFG Retirement retains the authority to terminate the Sub-Advisor relationship at CFG Retirement’s discretion.

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### Client Tailored Services and Client Imposed Restrictions

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

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### Wrap Fee Programs

CFG Retirement does not sponsor any wrap fee programs.

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**Client Assets under Management**

CFG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$123,422,168	\$0	12/31/2023

**Item 5: Fees and Compensation**

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**Method of Compensation and Fee Schedule****ASSET MANAGEMENT**

CFG Retirement may enter into sub-advisor/co-advisor agreements with other registered investment advisor firms. When using sub-advisors/co-advisors, the Client may incur additional platform or sub-advisor/co-advisor fees. The sub-advisor/co-advisor fees are not included in the fees charged by CFG Retirement, but are disclosed on the subadvisor's investment management agreement, which each client is provided, and must sign, in order to access the services of the sub-advisor/co-advisor. Such additional fees are only incurred on the portion of clients' portfolio managed by the sub-advisor/co-advisor. CFG Retirement charges an annual investment advisory fee based on the total assets under management as follows:

Amount Under Management	CFG Retirement Fee
Up to \$500,000	1.20%
\$500,001 - \$3,000,000	1.00%
\$3,000,001 - \$5,000,000	.85%
\$5,000,001 - \$10,000,000	.80%
\$10,000,001 - \$25,000,000	.70%
\$25,000,001 - \$50,000,000	.40%
\$50,000,001 - \$100,000,000	.30%

The annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are withdrawn from a Client's account in accordance with the sub-advisor/co-advisor utilized. Specific details will be provided in the Client Agreement signed by the Client. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation. Clients may terminate advisory services with thirty (30) days written notice. For accounts closed mid-quarter, CFG Retirement will be entitled to a pro rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

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**Client Payment of Fees**

Fees for asset management services are deducted from a designated Client account. The Client must consent in advance to direct debiting of their investment account.

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**Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

CFG Retirement, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.). For more details on the brokerage practices, see Item 12 of this brochure.

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#### **Prepayment of Client Fees**

CFG Retirement does not charge fees in advance.

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#### **External Compensation for the Sale of Securities to Clients**

CFG Retirement does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of CFG Retirement.

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

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#### **Sharing of Capital Gains**

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

CFG Retirement does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

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### **Item 7: Types of Clients**

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#### **Description**

CFG Retirement generally provides investment advice to individuals and high net worth individuals. Client relationships vary in scope and length of service.

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#### **Account Minimums**

CFG Retirement does not require a minimum to open an account.

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

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#### **Methods of Analysis**

Security analysis methods may include fundamental analysis, cyclical analysis and Modern Portfolio Theory. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Cyclical analysis involves analyzing the cycles of the market. Modern Portfolio Theory is a theory of finance that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets.

The main sources of information include the services of Morningstar's data fields and deciphered through the institutionally based system, Zephyr Style ADVISOR. Zephyr Style ADVISOR relies strictly on performance as its measure of analysis. This is defined as Returns-Based Analysis. Each security analyzed in this system is positioned relative to the appropriate index with respect to style, risk/return and performance.

Co-Advisors/Sub-Advisors utilized by CFG Retirement may use various methods of analysis to determine the proper strategy for the Client referred and these will be disclosed in the Co-Advisor/Sub-Advisor's Form ADV Part 2. Investing in securities involves risk of loss that



Clients should be prepared to bear. Past performance is not a guarantee of future returns. Other strategies utilized by Co-Advisors/Sub-Advisors may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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### **Investment Strategy**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with CFG Retirement:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, 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.

The risks associated with utilizing Sub-Advisor/co-advisor's include:

- Manager Risk
  - Sub-Advisor/co-advisor fails to execute the stated investment strategy
- Business Risk
  - Sub-Advisor/co-advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor/co-advisor's which is disclosed in the Sub-Advisor's Form ADV Part 2.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

CFG Retirement and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

CFG Retirement and its management have not been involved in administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

CFG Retirement and its management have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

No affiliated representatives of CFG Retirement are registered representatives of a broker-dealer.

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### **Futures or Commodity Registration**

Neither CFG Retirement nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

#### Appointed Insurance Representative

Managing member Vincent Oldre is also a licensed insurance agent through his affiliated insurance agency, CFG Retirement.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent of their choosing.

#### Advanced Advisor Marketing, LLC

Vincent Oldre is also Co-Founder of Advanced Advisor Marketing, LLC (AAM). AAM is an Insurance Marketing Organization (IMO) which provides a distribution channel on behalf of insurance companies for independent licensed insurance agents. In the event an independent

agent elects to partner with AAM, AAM will be compensated directly from the insurance company. The commission structure built into insurance products is predetermined by the insurance companies. The product purchased by the client is issued by the insurance company and the cost to the client is in no way altered by the IMO or the insurance agent involved. Furthermore, the client has no obligation to do business with the advisor/agent. Vincent Oldre receives a salary plus bonuses from AAM and therefore, a conflict of interest occurs. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation. Independent insurance agents may work with any insurance company and any IMO of their choosing, one of which may be AAM.

Approximately 15% of his time is spent in this practice. From time to time, he will offer clients products and/or services from these activities.

#### CRG Team, Inc.

Mr. Oldre is also owner of CRG Team, Inc. and National Retirement Academy. Approximately 10% of his time is spent in these activities. CRG Team, Inc. is a competitive kids racing team and National Retirement Academy is a non-profit that helps bring education around retirement. These activities do not create any conflict of interest as there are no crossover clients.

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### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

CFG Retirement may also utilize the services of a Sub-Advisor/co-advisor to manage Clients' investment portfolios. Sub-Advisor/co-advisor will maintain the models or investment strategies agreed upon between Sub-Advisor/co-advisor and CFG Retirement. Sub-Advisor/co-advisor executes all trades on behalf of CFG Retirement in Client accounts. CFG Retirement will be responsible for the overall direct relationship with the Client. CFG Retirement retains the authority to terminate the Sub-Advisor/co-advisor relationship at CFG Retirement's discretion.

In addition to the authority granted to CFG Retirement, Clients will grant CFG Retirement full discretionary authority and authorizes CFG Retirement to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to CFG Retirement in the Agreement. In addition, at CFG Retirement's discretion, CFG Retirement may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors.

This practice represents a conflict of interest as CFG Retirement may select Sub-Advisor/co-advisor who charge a lower fee for their services than other Sub-Advisor/co-advisor. This conflict is mitigated by disclosures, procedures, and by the fact that CFG Retirement has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

#### CreativeOne Wealth, LLC

Mr. Oldre has entered into a Marketing Agreement with CreativeOne, LLC, where Mr. Oldre borrows funds according to the terms and conditions set forth in a written Forgivable Loan & Promissory Note and Marketing Agreement, the latter outlines Mr. Oldre's obligations to CreativeOne for receipt of the loan. Mr. Oldre is required to (1) maintain a solicitor or sub-advisory relationship with CreativeOne, LLC, and (2) he maintains certain minimum billable assets under management in order to forgive the loan. This creates a conflict of interest that gives Mr. Oldre the incentive to place client assets with CreativeOne, LLC.

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

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### **Code of Ethics Description**

The employees of CFG Retirement have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of CFG Retirement employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of CFG Retirement. The Code reflects CFG Retirement and its supervised persons’ responsibility to act in the best interest of their client.

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

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

CFG Retirement’s Code is based on the guiding principle that the interests of the client are our top priority. CFG Retirement’s officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client’s interests over the interests of either employees or the company.

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

CFG Retirement will provide a copy of the Code of Ethics to any client or prospective client upon request.

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### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

CFG Retirement and its employees do not recommend to clients securities in which we have a material financial interest.

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

CFG Retirement and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as trading ahead of client transactions, employees are required to disclose all reportable securities transactions as well as provide CFG Retirement with copies of their brokerage statements.

The Chief Compliance Officer of CFG Retirement is Vince Oldre. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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

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

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Broker-Dealers for Client Transactions**

CFG Retirement may recommend the use of a particular broker-dealer such as TD Ameritrade or may utilize a broker-dealer of the client's choosing. CFG Retirement will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. CFG Retirement relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by CFG Retirement.

- *Directed Brokerage*

In circumstances where a client directs CFG Retirement to use a certain broker-dealer, CFG Retirement still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: CFG Retirement's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by CFG Retirement from or through a broker-dealer in exchange for directing client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, CFG Retirement receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of CFG Retirement. These benefits include both proprietary research from the broker and other research written by third parties.

CFG Retirement utilizes the services of custodial broker dealers. Economic benefits are received by CFG Retirement which would not be received if CFG Retirement did not give investment advice to clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to CFG Retirement's accounts, ability to conduct "block" client trades, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees

directly deducted from client accounts.

A conflict of interest exists when CFG Retirement receives soft dollars. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to act in the best interest of our clients and the services received are beneficial to all clients.

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### **Aggregating Securities Transactions for Client Accounts**

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

## **Item 13: Review of Accounts**

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

Account reviews are performed quarterly by the Chief Compliance Officer of CFG Retirement. Account reviews are performed more frequently when market conditions dictate.

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### **Review of Client Accounts on Non-Periodic Basis**

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

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### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the third party money manager's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. CFG Retirement does not provide additional reports to Clients.

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## **Item 14: Client Referrals and Other Compensation**

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

CFG Retirement receives a portion of the annual management fees collected by the Co-Advisors/Sub-Advisors to whom CFG Retirement refers clients.

This situation creates a conflict of interest because CFG Retirement and/or its Investment Advisor Representative have an incentive to decide what Co-Advisors/Sub-Advisors to use because of the higher referral fees to be received by CFG Retirement. However, when referring clients to a Co-Advisor/Sub-Advisor, the client's best interest will be the main determining factor of CFG Retirement.

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### **Advisory Firm Payments for Client Referrals**

CFG Retirement does not compensate for client referrals.

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## **Item 15: Custody**

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### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by CFG Retirement.

CFG Retirement is deemed to have constructive custody solely because advisory fees are

directly deducted from client's accounts by the custodian on behalf of CFG Retirement.

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by Co-Advisor/Sub-Advisor.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

CFG Retirement accepts discretionary authority to manage securities accounts on behalf of clients. CFG Retirement has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, CFG Retirement consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. CFG Retirement does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades..

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

CFG Retirement does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, CFG Retirement will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided because CFG Retirement does not serve as a custodian for client funds or securities and CFG Retirement does not require prepayment of fees of more than \$1,200 per client and six months or more in advance.

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

CFG Retirement has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

Neither CFG Retirement nor its management has had any bankruptcy petitions in the last ten years.

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

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**DECEMBER 2024**

This brochure supplement provides information about Vincent L. Oldre and supplements Assured Retirement Financial Group, Inc.'s brochure. You should have received a copy of that brochure. Please contact Vincent L. Oldre if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Vincent L. Oldre (CRD #6316933) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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#### Principal Executive Officer - Vincent L. Oldre, CFP®

- Year of birth: 1986
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#### Item 2 Educational Background and Business Experience

##### Educational Background:

- Gustavus Adolphus College; B.A. Degree in Business Management; 2008

##### Business Experience:

- CRG Team, Inc., Owner; 02/2024 – Present
  - National Retirement Academy; Founder; 01/2023 - Present
  - Assured Retirement Financial Group, Inc. dba CFG Retirement; Managing Member/Investment Advisor Representative; 05/2015 - Present
  - CFG Retirement formerly Assured Retirement Group; Owner/Insurance Agent; 12/2014 – Present
  - Advanced Advisor Marketing, LLC; Co-Founder; 10/2017 – Present
  - Mastermind Advisor Marketing, LLC dba Advisor Fuel, LLC; President; 02/2021 – 12/2023
  - Secured Retirement Advisors, LLC; Investment Advisor Representative; 03/2014 – 03/2015
  - The Annuity Store; Marketing Consultant; 10/2010 – 03/2014
  - Allianz Life; Internal Wholesaler; 04/2010 – 10/2010
  - Marcus and Millichamp; Sales Representative; 06/2008 – 04/2010
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#### Professional Certifications

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

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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### Item 3 Disciplinary Information

None to report.

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### Item 4 Other Business Activities

Managing member Vincent Oldre is also a licensed insurance agent through his affiliated insurance agency, CFG Retirement.

This represents a conflict of interest because it gives an incentive to recommend products and services based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent of their choosing.

Vincent Oldre is also Co-Founder of Advanced Advisor Marketing, LLC (AAM). Approximately 15% of his time is spent in this practice. AAM is an Insurance Marketing Organization (IMO) which provides a distribution channel on behalf of insurance companies for independent licensed insurance agents. In the event an independent agent elects to partner with AAM, AAM will be compensated directly from the insurance company. The commission structure built into insurance products is predetermined by the insurance companies. The product purchased by the client is issued by the insurance company and the cost to the client is in no way altered by the IMO or the insurance agent involved. Furthermore, the client has no obligation to do business with the advisor/agent. Vincent Oldre receives a salary plus bonuses from AAM and therefore, a conflict of interest occurs. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation. Independent insurance agents may work with any insurance company and any IMO of their choosing, one of which may be AAM.

Mr. Oldre is also owner of CRG Team, Inc. and National Retirement Academy. Approximately 10% of his time is spent in these activities. CRG Team, Inc. is a competitive kids racing team and National Retirement Academy is a non-profit that helps bring education around retirement. These activities do not create any conflict of interest as there are no crossover clients.

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#### **Item 5 Additional Compensation**

Mr. Oldre receives additional compensation in his capacity as an insurance agent, but he does not receive any performance-based fees.

##### CreativeOne Wealth, LLC

Mr. Oldre has entered into a Marketing Agreement with CreativeOne, LLC, where Mr. Oldre borrows funds according to the terms and conditions set forth in a written Forgivable Loan & Promissory Note and Marketing Agreement, the latter outlines Mr. Oldre's obligations to CreativeOne for receipt of the loan. Mr. Oldre is required to (1) maintain a solicitor or sub-advisory relationship with CreativeOne, LLC, and (2) the he maintains certain minimum billable assets under management in order to forgive the loan. This creates a conflict of interest that gives Mr. Oldre the incentive to place client assets with CreativeOne, LLC above all other advisor options who may offer better or different services and pricing.

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#### **Item 6 Supervision**

Since Mr. Oldre is the Chief Compliance Officer & President of Assured Retirement Financial Group, Inc. he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at 952-657-7470 or vince@cfgretirement.com.