

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**



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This brochure provides information about the qualifications and business practices of Opulen Financial Group, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 571-299-2053. 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 Opulen Financial Group, LLC (CRD #173963) 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 on July 31, 2023, the following changes have been made:

- Item 4 had been updated to disclose current assets under management.
  - Financial planning services have been updated.
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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 571-299-2053 or by email at: [tcymer@opulenfg.com](mailto:tcymer@opulenfg.com).

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## Item 4: Advisory Business

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### Firm Description

Opulen Financial Group, LLC (“OFG”) was founded in June of 2009 and began offering investment advisory services in 2014. Thomas J. Cymer is the managing member.

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### Types of Advisory Services

#### ASSET MANAGEMENT

OFG offers discretionary and non-discretionary asset management services to advisory Clients. OFG will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

#### Discretionary

When the Client provides OFG discretionary authority the Client will sign a limited trading authorization or equivalent. OFG will have the authority to execute transactions in the account without seeking Client approval on each transaction.

#### Non-Discretionary

When the Client elects to use OFG on a non-discretionary basis, OFG will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, OFG will obtain prior Client approval on each and every transaction before executing any transaction.

When deemed appropriate for the Client, OFG may use Schwab Personalized Indexing to manage all or a portion of the assets in the Client account. OFG has full discretion to hire and fire portfolio managers as we deem suitable. Portfolio managers will maintain the models or investment strategies agreed upon. OFG will be responsible for the overall direct relationship with the Client. OFG retains the authority to terminate the portfolio manager relationship at OFG’s discretion.

#### Betterment Platform

OFG offers discretionary direct asset management services to advisory clients utilizing The Betterment for Advisors platform for digital services. On this platform, OFG has the discretion to delegate the management of all or part of the Assets to one or more independent investment managers or independent investment management programs (“Independent Managers”). To the extent utilized, Independent Managers will have limited power-of-attorney and trading authority over those assets OFG directs to them for management. OFG will supervise the Independent Managers and monitor and review asset allocation and asset performance. OFG may terminate or change Independent Managers when, in OFG’s sole discretion, OFG believes such termination or changes is in your best interest.

#### FINANCIAL PLANNING AND CONSULTING

Financial planning will typically involve providing a variety of advisory services to Clients regarding the management of their financial resources based upon an analysis of their individual needs. If you retain OFG for financial planning and consulting services, OFG will meet with you to gather information about your financial circumstances and objectives.

Once OFG reviews and analyzes the information you provided, OFG will deliver a plan to

you, designed to help you achieve your stated financial goals and objectives.

OFG offers the following financial planning and consulting services: as outlined below:

### ***Comprehensive Financial Plan***

- Identification and Clarification of Goals -This step is all about collecting and prioritizing short-term and long-term financial goals from client, who maybe business owners, professionals, executives or individual, that need money and planning to achieve.
- Cash Flow Planning, Debt Elimination and Budgeting - The planning review Client's current and projected incomes, expenses, current debts, and net assets. And optimize the best pay off strategy along with achievable budgeting for Client to become debt free while maintaining Client's quality of life and lifestyle.
- Investment Planning - Advise Client how to smartly invest their money to ensure wealth accumulation based on their time horizon and risk tolerance. Client may also need recommendations on which diversified investment portfolio will be the optimal to meet their financial goals. Additionally, Clients may be concerned about how to invest in a tax-efficient way to accumulate their wealth to accomplish their goals.
- Retirement Planning - Clients usually need answers to questions like: "Will we be able to retire comfortably at age 62 or 65 or 67 or 70 based on the expected, before-tax or after-tax, income for the lifestyle, considering traveling and health care needs etc., with all of our current level of retirement savings? What additional savings should one consider for the income level desired? If we can't make our goal, what will the outcome be for our retirement?" And what is the safe and optimal income withdraw rate from retirement funds.
- College Planning - The expense for children's higher education is expected to keep increasing over time due to potential inflation. There are alternative ways and strategies to save and fund for education. Based on the education goal, some is more optimal than others, either through pre-paid tuition plan or a 529 College Savings Plan etc. OFG will help explain and explore alternatives available to the Client and offer recommendation as to what might be the most suitable to Client's goal.
- Life Insurance and Disability Income Planning - Assess areas of risk exposure to ensure proper coverage are very important when it comes to protecting family and business with either a lump sum payment or an income replacement for as long as disability, in addition to home, auto and umbrella insurances. The planning will be based on the financial goals and liability to determine what life insurance, long-term-care insurance and disability income, if needed how much coverage, are recommended to provide protection and risk management.
- Employee Benefit Planning - The planning applies a multi-disciplined approach and education to recommend employee benefit program so that it improves employee satisfaction, business productivity through non-wage compensation, profit sharing, and other plans etc.
- Income Tax Planning - Income taxes can be costly, complicated, but optimized. The planning will recommend some appropriate financial strategies considering income tax scenarios to improve overall tax situation. Some unique tax savings strategies may be available to the Client or their business. OFG will help identify tax savings

opportunities and potential pitfalls to avoid. OFG does not provide income tax advice, and recommend Clients seek the services of a tax advisor as needed.

- **Estate Wealth Transfer Strategies and Legacy Planning** - The planning will review Clients overall financial assets and advise Clients to best meet their legacy goals. Assist Clients in working together with their attorney to develop long-term strategies. These include as appropriate, gifting, living trusts, as well as more sophisticated trusts and strategies, wills, review estate tax, powers of attorney, beneficiary designations and health care directives. We do not provide legal advice nor draft legal documents, but recommend Clients seek the services of an attorney as collaboration needed.
- **Charitable Giving Strategies and Planning** - The planning tailors to Client's charity inclination to give to charity in the most tax-efficient manner. As one key advantage of tax strategies is its reduction of the cost of donations that Client have already chosen to make matching Client's personal values and goals. For tax-efficient charitable giving, the planning will consider one or more of standard tax planning implementation strategies and collaborate with Client's attorney.

Financial plans will be completed and delivered inside of sixty (60) days. Client may terminate advisory services with five (5) business days written notice. Services are considered complete when the plan and/or recommendations are rendered.

Financial plans and/or consulting are based on your financial situation at the time OFG presents the plan to you, and on the financial information you provided to OFG. You must promptly notify OFG if your financial situation, goals, objectives, or needs change.

### ***Ongoing Financial Planning***

Ongoing financial planning incorporates a six-step planning process:

1. Identifying and prioritizing financial and life goals,
2. Gathering and organizing financial data,
3. Analyzing financial information,
4. Proposing written recommendations,
5. Taking action, and
6. Tracking progress.

Topics covered may include, but are not limited to:

- **Financial position planning**, consisting of allocating a Client's resources to optimize net worth, cash reserve, and cash flow;
- **Income tax planning**, addressing the general tax considerations for transactions and ownership structures, optimizing allocation based on asset location, Roth conversion strategies.
- **Investment planning**, allocating a Client's investment portfolio in a way that is consistent with their goals, current financial situation, and risk tolerance;
- **Retirement planning**, applying strategies to help fund retirement, transition to retirement or ensure adequate retirement income;
- **Employee benefits planning**, developing strategies to take advantage of employer-sponsored benefit plans;



- **Business planning**, addressing financial planning needs as a business owner, which may include an analysis of business cash flow, business valuation, business tax planning, business benefits planning and business transition;
- **Education funding**, developing strategies to help fund the education of children, grandchildren or others.
- **Accumulation goals**, quantifying future goals and developing strategies to achieve them;
- **Protection needs**, analyzing needs in the event of death, disability, long-term care, and lawsuit, as applicable;
- **Estate planning**, developing strategies to pass wealth to beneficiaries in an efficient manner.

Clients can expect the following:

- At least one meeting to determine financial goals and values, what the Client's current financial picture looks like (including assets, debts, income and spending), and what current limitations or hurdles the Client may be facing.
- At least one meeting to deliver financial planning recommendations and action items.
- Quarterly meetings to discuss goals, monitor progress and update any changes.
- Ongoing check-ins (as needed) via phone or email or web conferencing for accountability or encouragement and to address changes along the way.
- Initial recommendations are completed and delivered within ninety (90) days, contingent upon timely delivery of all required documentation.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

Ongoing financial planning will continue from year to year until cancelled by either party.

#### ERISA PLAN SERVICES

OFG provides service to qualified and non-qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. OFG acts as a 3(21) advisor:

**Limited Scope ERISA 3(21) Fiduciary.** OFG typically acts as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions on a non-discretionary basis. As an investment advisor OFG has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using OFG can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options.

- Assist the Client in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide non-discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands the Advisor’s assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor’s definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, the Advisor is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. Advisor will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

Advisor may provide these services or, alternatively, may arrange for the Plan’s other providers to offer these services, as agreed upon between Advisor and Client.

3. The Advisor has no responsibility to provide services related to the following types of assets (“Excluded Assets”):

- a. Employer securities;
- b. Real estate (except for real estate funds or publicly traded REITs);
- c. Stock brokerage accounts or mutual fund windows;
- d. Participant loans;
- e. Non-publicly traded partnership interests;
- f. Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- g. Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to the Advisor under this Agreement.

Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

### **SEMINARS**

OFG holds seminars to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. OFG does not charge a fee for attendance to these seminars.

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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 objective. 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**

OFG does sponsor and manage a wrap fee program. The Client pays one fee to OFG which includes OFG's Management Fee and the transaction costs associated with the transactions. Thomas J. Cymer, Managing Member, will manage all Program accounts. Accounts will not be managed by any other party. As of October 1, 2022, no new clients will be placed in the wrap program sponsored and managed by OFG.

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### **Client Assets under Management**

OFG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$111,213,000	\$3,300,000	December 31, 2023

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## **Item 5: Fees and Compensation**

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### **Method of Compensation and Fee Schedule**

#### **ASSET MANAGEMENT**

OFG offers direct asset management services to advisory Clients. OFG charges an annual investment advisory fee based on the total assets under management as follows:

Assets under management	Maximum annual fee	Maximum monthly fee
\$0-\$500,000	1.75%	.146%
\$500,001 - \$1,000,000	1.25%	.104%
\$1,00,001 - \$2,000,000	1.00%	.083%
Over \$2,000,000	0.75%	.063%

OFG's annual fee may be negotiable based on a number of factors, which include but are not limited to "grandfathered" accounts, related accounts, and other structures that we may consider in special situations. In limited situations, we may also manage accounts for family and friends without charge. Individual accounts within the same household may be combined for a reduced fee. Householding applies to accounts in both passively, actively or a combination of both. Annual Fee payments are due and assessed at the beginning of each month based on the value of the assets under management as of the close of business on the last business day of the preceding month as valued by the custodian. If an account is opened after the calendar month, than the initial fee billed will be prorated for the

remainder of the month. Monthly advisory fees deducted from the Clients' account by the custodian.

When utilizing Schwab Personalized Indexing to manage Clients' investment portfolios client will pay an additional fee of 0.12% annually. This will be disclosed on the agreement between Client and OFG. The annual fee will be billed monthly in arrears. Schwab will deduct their portion of the directly from the Client's account.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by OFG with thirty (30) days written notice to Client and by the Client at any time with written notice to OFG. 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.

#### Betterment Investment Platform

When utilizing the Betterment Investment platform, fees will be billed as follows:

<b>Assets under management</b>	<b>OFG annual fee</b>	<b>Betterment Annual Fee</b>	<b>Total Maximum Annual Fee</b>
\$0-\$500,000	1.75%	.20%	1.95%
\$500,001 - \$1,000,000	1.25%	.20%	1.45%
\$1,00,001 - \$2,000,000	1.00%	.20%	1.20%
\$2,000,001 - \$10,000,000	0.75%	.18%	.93%
\$10,000,001 - \$30,000,00.	0.75%	.16%	.91%
\$30,000,001 - \$100,000,000	0.75%	.14%	.89%
\$100,000,001 and on	0.75%	.12%	.87%

Fees will be prorated and billed monthly in arrears. Fees will be automatically deducted from your account. As part of this process, you understand and acknowledge the following:

- Betterment Securities as the custodian sends statements at least monthly to Clients showing all disbursements for their account, including the amount of the advisory fees paid to our firm;
- The Client has provided authorization permitting fees to be directly paid by these terms;
- Betterment Institution calculates the advisory fees and deducts them from the Client's account. The fees are based on the end of month balance of their entire account. Client will see the total fee (to include the Betterment for Advisors platform fee of in addition to the annual percentage of assets charged by OFG.
- Betterment collects both their fee and OFG's fee from each Client and remit OFG's portion directly to OFG.

The investment advisory fee will be billed directly to the Custodian, with an informational copy of the invoice to Client. The Custodian will deduct the fee for the Account upon receipt of the invoice, or shortly thereafter. Subsequently the custodian will pay Betterment and OFG. OFG will not be compensated based on the basis of a share of capital gains or capital appreciation of the assets in the Account.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by OFG with thirty (30) days written notice to Client and by the Client at any time with written notice to OFG. 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.

## **FINANCIAL PLANNING AND CONSULTING**

### ***Comprehensive Financial Plan***

OFG charges an hourly fee of \$200 per hour based on complexity and unique Client needs for a comprehensive financial plan. Prior to the planning process the Client will be provided an estimated plan fee.

Services are completed and delivered inside of sixty (60) days. Client may cancel within five (5) business days of signing Agreement without any obligation and without penalty. If the Client cancels after five (5) business days, OFG is due payment based on work completed and the Client will receive all completed portions of their consultation/plan.

The fee will be due upon delivery of the plan.

### ***Ongoing Financial Planning***

OFG charges a fixed annual fee for ongoing financial planning. Prior to the planning process the Client will be provided an estimated plan fee. The fee is based on the complexity of a Client's financial situation and the number of financial goals to be addressed.

The fixed annual fee ranges from \$4,000 to \$24,000 and is paid monthly in arrears.

Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to OFG. OFG reserves the right to waive the fee should the Client implement the plan through OFG. Fees will continue from year to year unless cancelled by either party in writing.

## **ERISA PLAN SERVICES**

The annual investment advisory fee for ERISA Plans is .30% of the assets held in the plan. This fee is negotiable and may be billed either from direct deduction from the plan assets or billed directly to the Client. The fee is charged in arrears and the initial fee will be based on the market value of the Plan assets as calculated by the custodian or record keeper of the Included Assets on the first business day of the initial fee period and will be due on the first business day of the fee period. For services started any time other than the first day of a quarter, the fee will be prorated based on the number of days remaining in the initial fee period. Thereafter, the fee will be based on the market value of the Plan assets on the last business day of the previous fee period (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets) and will be due within ten (10) business day. If this Agreement is terminated prior to the end of the fee period, OFG shall be entitled to a prorated fee based on the number of days during the fee period services were provided. Any unearned fees shall be refunded to the Plan or Plan Sponsor. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, OFG is due a pro-rata fee based on the amount of work completed.

The compensation of OFG for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. OFG does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, OFG will disclose this compensation, the services rendered, and the payer of compensation. OFG will offset the compensation against the fees agreed upon under this Agreement.

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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.
- Billed direct to Client.

Fees for ERISA services will either be deducted from Plan assets or paid directly to OFG. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed:

- Billed direct to Client via check or credit card.
- Deducted from a non-qualified account managed by OFG. The Client must consent in advance to direct debiting of their investment account.

All applicable refunds of pre-paid fees will be sent to Client via check to their address of record within 15 days of receipt of termination of the executed agreement. The refund amount will be based on the amount of work completed, charged an hourly rate of \$250.

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**Additional Client Fees Charged**

In addition to the Annual Fee, Client may also incur certain charges imposed by third parties in connection with investments made through Program accounts, including those imposed by the custodian. These may include, but are not limited to, the following: mutual fund or money market 12b-1 fees, sub-transfer agent fees, certain deferred sales charges on previously purchased mutual funds transferred into the account, other transaction charges and service fees, IRA and qualified retirement plan fees, alternative investment administrative fees, administrative servicing fees for trust accounts, creation and development fees or similar fees imposed by unit investment trust sponsors, managed futures investor servicing fees, and other charges required by law. OFG does not receive any portion of these fees. Further information regarding charges and fees assessed by a mutual fund or variable annuity are available in the appropriate prospectus.

Mutual funds may also charge a redemption fee if a redemption is made within a specific time period following the investment. The terms of any redemption fee are disclosed in the fund's prospectus. Transactions in mutual fund shares (e.g., for rebalancing, liquidations, deposits or tax harvesting) may be subject to a fund's frequent trading policy.

Client should be aware that margin borrowing involves additional risks. Margin borrowing will result in increased gain if the value of the securities in the account go up, but will result in increased losses if the account value decreases.

OFG, 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.).

Clients participating in non-wrap asset management services, Client's may also pay transaction fees and commissions. For more details on the brokerage practices, see Item 12 of this brochure.

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**Prepayment of Client Fees**

OFG does not require a prepayment of fees of more than \$1,200 per Client and six months or more in advance.

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

OFG does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of OFG.

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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.

OFG 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**

OFG generally provides investment advice to individuals, high net worth individuals, and corporations. Client relationships vary in scope and length of service.

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**Account Minimums**

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

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

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**Methods of Analysis**

OFG's method of security analysis is primarily fundamental, although OFG may employ a wide range of methods to manage portfolios and evaluate investments. OFG's analysis is based on sources of information from academic research materials, corporate rating services, financial publications, annual reports, prospectuses, and filings with the SEC. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

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

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

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

- *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.

- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur in the relevant time period (i.e., before the option expires). Additionally, options are less tangible than some other investments. An option is a "book-entry" only investment without a paper certificate of ownership.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

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

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### **Administrative Enforcement Proceedings**

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

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

OFG and its management have not been involved in legal or disciplinary events related to past or present investment Clients.

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

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

OFG is not registered or affiliated with a broker/dealer.

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### **Futures or Commodity Registration**

Neither OFG 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**

Managing Member Thomas J. Cymer has a financial industry affiliated business as an insurance agent. Approximately 10% of Mr. Cymer's time is spent in this practice. From time to time, he will offer Clients advice or products from those activities.

This practice represents conflicts of interest because it gives Mr. Cymer an incentive to recommend products based on the commission amount received. This conflict is mitigated

by disclosures, procedures, and the firm's Fiduciary obligation to place the interests of the Client first and Clients are not required to purchase any products. Clients have the option to purchase insurance products through another insurance agent of their choosing.

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

OFG does not refer the services of Third Party Money Managers to manage Client accounts.

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**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 OFG have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of OFG employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of OFG. The Code reflects OFG and its supervised persons' responsibility to act in the best interest of their Client.

One area 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.

OFG'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 OFG 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.

OFG's Code is based on the guiding principle that the interests of the Client are our top priority. OFG'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.

OFG 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**

OFG 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**

OFG employees may buy or sell securities that are also held by Clients. In order to avoid conflicts of interest such as front running of Client trades, employees are required to

disclose all reportable securities transactions as well as provide OFG with copies of their brokerage statements.

The Chief Compliance Officer of OFG is Thomas J. Cymer. He reviews all employee trades each month. 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**

OFG 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 OFG with copies of their brokerage statements.

The Chief Compliance Officer of OFG is Thomas J. Cymer. 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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**Item 12: Brokerage Practices**

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

OFG may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the Client's choosing. OFG will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. OFG relies on its broker to provide its execution services at the best prices available. 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 affected, 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. OFG will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. OFG 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 OFG. OFG does not receive any portion of the trading fees.

- *Directed Brokerage*

In circumstances where a Client directs OFG to use a certain broker-dealer, OFG still has a fiduciary duty to its Clients. The following may apply with Directed Brokerage: OFG'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. OFG reviews the execution of trades at each custodian each quarter.

- *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 OFG 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, OFG receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of OFG. These benefits include both proprietary research from the broker and other research written by third parties.

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

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

OFG 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 OFG. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., non-discretionary accounts, withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

## **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 Thomas J. Cymer, Chief Compliance Officer. Mr. Cymer will review accounts for such things as:

- Client objectives are in line with the investments;
- Securities held in the accounts are performing to Advisor and Client's expectations; and
- Asset allocation is balanced in the correct proportion with the strategy.

Account reviews are performed more frequently, such as when the Client account strategy is materially altered due to market conditions, changes in Client situation (e.g. Marital status), or other factors.

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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 from the custodian no less than quarterly for managed accounts. Client receives confirmations of each transaction in account from

Custodian and an additional statement during any month in which a transaction occurs. OFG does not provide Clients additional reports.

## **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**

OFG receives additional economic benefits from external sources as described above in Item 12.

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

OFG does not compensate for Client referrals.

## **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.

OFG is deemed to have constructive custody solely because advisory fees are directly deducted from Client's account by the custodian on behalf of OFG.

Clients will receive statements from the custodian should review/compare those carefully with any report generated by OFG.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

If applicable, Client will authorize OFG discretionary authority, via the advisory agreement, 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. If applicable, Client will authorize OFG discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. If however, consent for discretion is not given, OFG will obtain prior Client approval before executing each transaction.

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

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

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

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### **Proxy Votes**

OFG 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, OFG 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 OFG does not serve as a custodian for Client funds or securities and OFG does not require prepayment of fees of more than \$1,200 per Client and six months or more in advance.

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

OFG has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

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

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

## **SUPERVISED PERSON BROCHURE**

FORM ADV PART 2B

**Thomas J. Cymer, CFA, CFP®, CRPC, CMT**



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**FEBRUARY 23, 2024**

This brochure supplement provides information about Thomas J. Cymer and supplements the Opulen Financial Group, LLC's brochure. You should have received a copy of that brochure. Please contact Thomas J. Cymer if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas J. Cymer (CRD #5092012) 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 - Thomas J. Cymer**

- Year of birth: 1984
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#### **Item 2 Educational Background and Business Experience**

##### **Educational Background:**

- UMass Amherst; Bachelor of Arts - Economics and Psychology; 06/2006

##### **Business Experience:**

- Opulen Financial Group, LLC; Managing Member/Investment Advisor Representative; 01/2015 - Present
  - Opulen Financial Group, LLC; Managing Member; 06/2009 - Present
  - Thomas Cymer – Sole Proprietor; Insurance Agent; 06/2009 – Present
  - Zeiders Enterprises; Instructor; 03/2013 –04/2015
  - NEXT Financial Group, Inc.; Registered Representative; 05/2009 – 04/2015
  - Ameriprise Financial Services, Inc.; Investment Advisor Representative; 04/2006 – 06/2009
  - Ameriprise Financial Services, Inc.; Registered Representative; 01/2006 - 05/2009
  - UMass Amherst; Student; 09/2002 - 04/2006
- 

#### **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.

Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC®): Chartered Retirement Planning Counselor is a designation granted by the College for Financial Planning. CRPC® certification requirements:

- Successfully complete the program.
- Pass the final exam.
- Comply with the Code of Ethics.
- When you achieve your CRPC® designation, you must complete 16 hours of continuing education.
- Reaffirm to abide by the Standards of Professional Conduct.
- Pay a biennial renewal fee.

Chartered Financial Analyst (CFA): Chartered Financial Analysts designation is awarded by the CFA Institute. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent educational or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Chartered Market Technician® (CMT): The Chartered Market Technician® (CMT) credential is a global designation for practitioners of technical analysis. The designation is awarded to those who demonstrate mastery of a core body of knowledge of investment risk in portfolio management settings. Earning the CMP charter makes you part of a community of investment professionals recognized as specialists and value generators.

Requirements:

- Successful completion of all three levels of the CMT exam process
- Three years of professional analytical or investment management experience
- Member, Market Technicians Association
- Ethics - To maintain status as a CMT charterholder, an affiliate must be a member of the MTA in good standing and abide by the MTA Code of Ethics.
- Continuing education – None
- Members and affiliates who participate in the voluntary CE Program are asked to satisfy a **15-credit level** before the end of the calendar year.

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### **Item 3 Disciplinary Information**

None to report.

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### **Item 4 Other Business Activities**

Thomas J. Cymer has a financial industry affiliated business as an insurance agent. From time to time, he offers Clients advice or products from this activity. Approximately 10% of Mr. Cymer's time is spent on this practice. Clients are not required to purchase any products.

This practice represents conflicts of interest because it gives Mr. Cymer an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the interests of the Client first and Clients are not required to purchase any products. Clients have the option to purchase insurance products through another insurance agent of their choosing.

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### **Item 5 Additional Compensation**

Mr. Cymer receives additional compensation in his capacity as an insurance agent. He does not receive any performance-based fees.

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### **Item 6 Supervision**

Since Mr. Cymer is the sole owner of Opulen Financial Group, LLC; he is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients.