

**FORM ADV Uniform Application for Investment Adviser Registration**  
**Part 2A: Investment Adviser Brochure**  
**Item 1: Cover Page**

**Oxford Asset Management, LLC**  
**One Source Wealth Advisors**

**CRD # 114571**  
**SEC # 801-69005**  
3827 N. 10<sup>th</sup> St. Suite 104  
McAllen, TX 78501  
Phone: (956) 618-5600  
Fax: (956) 467-5374  
[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**December 2016**

*This brochure provides information about the qualifications and business practices of Oxford Asset Management, LLC, also doing business as Onesource Wealth Advisors.*

*If you have any questions about the contents of this brochure, please contact us at the phone number listed above.*

*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. Oxford Asset Management, LLC is an investment advisor registered with the United States Securities and Exchange Commission. Registration does not imply a certain level of skill or training.*

*Additional information about the firm and its representatives is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

<b>Item 2: Material Changes</b>
---------------------------------

The changes discussed herein do not necessarily constitute material changes since the last updating amendment to Oxford Asset Management, LLC's brochure as of March 30, 2015.. Other non-material amendments were made to this brochure, which are not discussed in this summary, and consequently, we encourage our clients to read the entire brochure in its entirety.

### Item 3: Table of Contents

Topic	Page #
<b>Item 1:</b> Cover Page .....	1
<b>Item 2:</b> Material Changes .....	2
<b>Item 3:</b> Table of Contents (this page) .....	3
<b>Item 4:</b> Advisory Business.....	4
<b>Item 5:</b> Fees & Compensation .....	4
<b>Item 6:</b> Performance-based Fees and Side by Side Management .....	5
<b>Item 7:</b> Types of Clients .....	5
<b>Item 8:</b> Methods of Analysis, Investment Strategies, & Risk of Loss .....	6
<b>Item 9:</b> Disciplinary Information.....	7
<b>Item 10:</b> Other Financial Industry Activities & Affiliations.....	7
<b>Item 11:</b> Code of Ethics, Participation or Interest in Client Transactions, & Personal Trading.....	8
<b>Item 12:</b> Brokerage Practices.....	8
<b>Item 13:</b> Review of Accounts .....	10
<b>Item 14:</b> Client Referrals & Other Compensation .....	10
<b>Item 15:</b> Custody .....	10
<b>Item 16:</b> Investment Discretion .....	11
<b>Item 17:</b> Voting Client Securities .....	11
<b>Item 18:</b> Financial Information.....	11
<b>Part 2B:</b> Brochure Supplements (Items 1-6) .....	12

#### **Item 4: Advisory Business**

Established in 1996 by Managing Member James G. Palumbo, Oxford Asset Management, LLC (“Oxford” or the “firm”) provides investment management and financial planning services for individuals, pension/profit sharing plans, state/municipal governments/entities, and corporate clients. The firm’s principal owners are Mr. James G. Palumbo and Ms. Cheri C. Palumbo.

Oxford’s investment management services include an assessment of the client’s specific investment goals, current financial situation, objectives, risk tolerances as distinguished from those of other clients, and all relevant financial data (including employment, income, tax bracket, family obligations, etc.). Accounts are managed on a discretionary basis pursuant to a written investment management agreement with our firm. Any restrictions or limitations to our discretionary authority must be set forth in writing in the investment management agreement or other applicable document.

#### **Assets under Management as of December 31, 2016:**

<b>Discretionary AUM</b>	<b>\$85,588,510.00</b>
<b>Non-Discretionary</b>	<b>\$14,500,000.00</b>
<b>Total</b>	<b>\$100,088,510.00</b>

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

##### **Investment Management Services:**

All accounts are charged a percentage-based fee, which is based on the client’s assets under management.

<b>Assets</b>			<b>Diversified Annualized</b>		<b>Quarterly</b>	<b>Fixed-Income Annualized</b>		<b>Quarterly</b>
<b>\$1.00</b>	to	<b>\$99,999.00</b>	2.50%	or	0.6250%	1.00%	or	0.2500%
<b>\$100,000.00</b>	to	<b>\$249,999.00</b>	1.98%	or	0.4950%	0.90%	or	0.2250%
<b>\$250,000.00</b>	to	<b>\$749,999.00</b>	1.50%	or	0.3750%	0.80%	or	0.2000%
<b>\$750,000.00</b>	to	<b>\$999,999.00</b>	1.25%	or	0.3125%	0.70%	or	0.1750%
<b>\$1,000,000.00</b>	and over		1.00%	or	0.2500%	0.60%	or	0.1500%

Management accounts that require a financial plan may be charged an additional \$1,500.00 to \$2,500.00. The fee will depend on the number of elements within the plan.

Account fees are charged quarterly in advance. Oxford also provides financial consultations and financial planning services at a rate of \$400 per hour. Consultation fees are due and payable within ten days. All fees are negotiable under special circumstances.

The fees for most accounts are debited directly from the client's account on a quarterly basis in advance. In certain cases the firm will invoice the client directly, also on a quarterly basis in advance. Some 401(k) platforms, however, such as John Hancock, deduct, and remit the management fee on a monthly basis in advance. Clients may choose to have fees deducted directly from their accounts or receive invoices from Oxford.

Client accounts may be invested in mutual funds, separately managed accounts, sub-advised accounts, insured accounts, or exchange traded funds (or similar securities). These securities and financial instruments can carry additional fees and expenses, including advisory fees, sub-advisory fees, insurance premiums, hedging expenses, brokerage commissions and other transaction costs, in addition to Oxford's fees.

Accounts are also charged a one-time application fee of \$50 to open an account. All accounts incur a \$75 termination fee to close an account. Retirement accounts are charged a \$50 administration fee to withdraw money. Upon termination, Oxford is entitled to charge a proportionate part of the fee that has not been collected. Until paid, client consents that the fees and expenses of Oxford shall constitute a lien upon the assets of the account. Establishment/termination fees are implemented to cover administrative costs.

Client funds may be invested in model portfolios or separately managed accounts utilizing sub-advisors including Dynamic Wealth Advisors (DWA), Swan Global Investments, and or others, and may incur an additional asset based charge of up to 0.1625% per quarter.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of written 60-day notice. Due to significant time involvement during the first year relating to the development of a financial plan, if the contract is cancelled during that first year, the hourly fee will be charged. Any difference between this hourly charge and the cumulative quarterly fees paid will be due and payable upon cancellation.

In the event a client terminates its advisory agreement with Oxford prior to the end of a quarter, Oxford will not refund the client for any fees previously charged to the client. Fees are considered earned as received.

#### **Item 6: Performance-based fees and Side-by-Side Management**

Oxford does not charge any performance-based fees (fees based on a share of capital gains or capital appreciation of assets). Accordingly, side by side management does not apply to the services rendered by the firm.

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

The firm's services are provided to individuals, pension/profit sharing plans, state/municipal governments/entities, and corporate clients. For investment management clients a minimum account size of \$50,000 is required at all times (subject to waiver under special circumstances by Oxford).

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

The firm's methods of analysis include a fundamental approach to market performance and overall history. The firm utilizes certain diagnostic tools including software and other technical programs to assist in determining investment selection for clients.

The firm uses asset allocation, hedges, tactical strategies, and risk mitigation programs among other customary tools and strategies to endeavor to develop a balanced portfolio for each client according to their investment objectives and goals. However, investing in securities involves a risk of loss that clients should be prepared to bear. Where short-term trading methods are used, the cost of more frequent trades can often incur more expense than that of a more long-term purchase approach. Questions regarding these risks and/or increased costs may be addressed directly with firm management.

The following is not meant to be a complete description of risks. See also the offering documents, investment management agreements, and other applicable documents in connection with the pooled investment vehicle, which include additional disclosure regarding risks that should be considered by investors.

**Firm's Investment Activities.** The firm's investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors which are neither within the control of nor predictable by the firm. Such factors include a wide range of economic, political, competitive and other conditions (including acts of terrorism and war) that may affect investments in general or specific industries or companies. The markets may be volatile, which may adversely affect the ability of the firm to realize profits on behalf of its clients. As a result of the nature of the firm's investing activities, it is possible that the firm's results may fluctuate substantially from period to period.

**Concentration of Investments.** While the firm takes concentration and diversification into account and typically limits concentration while promoting diversification within portfolios, the firm does not subject the portfolios to any formal policies regarding diversification. The concentration of the firm's portfolios would subject clients to a greater degree of risk with respect to the failure of one or a few investments, or with respect to economic downturns in relation to an individual industry.

**Inflation Risk.** The firm's portfolios will typically face inflation risk to a degree, which results from the variation in the value of cash flows from a financial instrument due to

inflation, as measured in terms of purchasing power. For example, if the firm purchases a 5-year bond in which it can realize a coupon rate of 5%, but the rate of inflation is 6%, then the purchasing power of the cash flow has declined. For all but inflation linked bonds, adjustable bonds or floating rate bonds, the firm is exposed to inflation risk because the interest rate the obligor promises to pay is fixed for the life of the financial instrument. To the extent that interest rates reflect the expected inflation rate, floating rate bonds have a lower level of inflation risk.

**Market or Interest Rate Risk.** The price of most fixed income securities move in the opposite direction of the change in interest rates. For example, as interest rates rise, the prices of fixed income securities fall. If the firm holds a fixed income security to maturity, the change in its price before maturity may have little impact on the firm portfolios' performance. However, if the firm determines to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss.

**US Dollar Concentration.** The firm invests exclusively in US dollar denominated securities and other investments, and accordingly clients are not diversified with respect to currency risk. If US denominated investments do more poorly generally than a portfolio that contains investments denominated in other currencies, than an investor could achieve investment results that are inferior to results achieved by investors with portfolios more diversified by currency.

## **Item 9: Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Our firm and our management personnel have no reportable disciplinary events.

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

In addition to their advisory duties, firm personnel serve as independent insurance agents with the firm's insurance agency affiliate; OneSource Financial Services ([www.onesourcefs.com](http://www.onesourcefs.com)). Accordingly, firm personnel may offer such services to clients and in such cases earn additional commission-based compensation for sales related to same. The firm also employs accountants who may provide tax and other related services to clients at additional cost.

RIA may utilize Dynamic Wealth Advisors ("DWA") for back office support, technology platforms and portfolio management services for client accounts. DWA is an investment adviser registered with the U.S. Securities and Exchange Commission (CRD #151367), and may provide RIA with investment management solutions, including, but in no way limited to, the following: investment administration, account aggregation, fee collection, record

maintenance, report preparation, marketing assistance, and research services. Fees charged by DWA are paid by RIA directly. Generally, there will be no additional fee charged to RIA clients should we only utilize DWA's back-office and technical services. RIA may charge clients an additional asset based charge of 0.20%-0.65% annually if investment administration is performed by DWA or other such registered investment advisors assisting RIA with such services, including, but not limited to, model portfolio implementation or separately managed accounts. Clients should refer to the Fee Schedule in their Investment Advisory Agreement.

The firm no longer manages the private fund, OneSource Investment Partners, LLP, however clients, friends, and relatives remain as partners in the partnership which may create a conflict of interest.<sup>1</sup>

The firm has adopted a Code of Ethics to address the misappropriation of material nonpublic information. Proprietary information (e.g. insider trading). Oxford's insider trading prohibitions (i) apply to all personnel, (ii) extend to activities within and outside their duties as employees of Oxford, and (iii) apply to investment-related information that is internal to the fund. Firm personnel are required to adhere to the policies contained within the Code of Ethics, the firm's Compliance Manual, and the insider-trading policies therein.

*Please see the Part 2B brochure supplements for further information related to the other business activities engaged in by firm personnel.*

<sup>1</sup> *Private Fund*: def. Rule 203(b)(3)-1(d) Investment Advisers Act (1940)

<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>
---

Pursuant to Rule 204A-1 of the Investment Advisers Act of 1940, Oxford has adopted a Code of Ethics. The firm has determined to set forth guidelines for professional standards, under which all employees are to conduct themselves. The firm has set high standards, the intention of which is to protect client interests and to demonstrate the firm's commitment to its fiduciary duties of honesty, good faith and fair treatment.

All employees are expected to adhere to these guidelines, as well as the procedures for the approval and reporting of personal securities transactions. Where firm personnel may buy/sell for their own accounts those investments they have similarly recommended to clients, the firm requires such persons to regularly file holdings reports. Such reports are reviewed against firm and client holdings for violations of firm policy.

In accordance with Section 204A of the Investment Advisers Act of 1940, Oxford has also established procedures to prevent the misuse of material, nonpublic information by the firm, its officers and/or employees. These procedures include a prohibition on the use of any such information either personally or on behalf of any client, no matter how



innocently the information may have been acquired. A copy of the firm's Code of Ethics and written supervisory procedures is available for review by contacting firm management directly.

## **Items 12: Brokerage Practices**

For most client accounts, the firm will recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker dealer and member of the Securities Investors Protection Corporation (SIPC).

Oxford is independently owned and operated and not affiliated with Schwab. Schwab provides Oxford's clients with access to institutional trading and custody services, which are typically not available to Schwab retail investors. These services are generally made available to independent investment advisers on an unsolicited basis, at no charge provided the adviser maintains a total of at least \$10 million of client assets in accounts at Schwab. Schwab's services include brokerage, custody, research and access to mutual funds and other investments that are generally available only to institutional investors or would require a significantly higher minimum initial investment.

For Oxford client accounts maintained in its custody, Schwab generally does not charge separately for custodial services. Instead, Schwab is compensated by account holders through commission-based transactions or other related fees for securities traded and executed through Schwab, or that settle into Schwab accounts.

In selecting brokers to affect a securities transaction for a client, consideration is given to the quality of the selected broker's execution of similar transactions, the commission rates charged and in some cases, the quantity and quality of research and/or other investment advisory support provided by the broker. Oxford may therefore recommend or use Schwab for its useful research and securities transaction services even where such services come at greater cost to the clients account. Directing transactions in such a manner and receiving research and execution services is called "soft dollars." The research and other investment advisory support services include:

- macro- and micro-economic reports,
- industry-wide reports,
- reports on specific investment selection of investment vehicles, Personal consultation, and in some cases, software and electronic linkages which facilitate execution and record keeping.

In addition, Schwab may make available, arrange and/or pay for these types of services as rendered by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of that third-party provider.

As a fiduciary, Oxford is required to act in its clients' best interests. Where Oxford recommends that clients maintain their assets in accounts at Schwab, the firm's recommendation may be based in part on the benefit to Oxford as mentioned above and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest. Accordingly, Oxford may have an incentive to select or recommend Schwab based on the services it provides rather than on client interests in receiving the best execution.

Clients may also at times pay commissions to brokers not directly responsible for the particular research or services which led to or facilitated the transaction generating the commission. Conversely, they may benefit from research or service paid for by commissions paid by others.

At times, Oxford is able to achieve volume discounts by aggregating orders on behalf of two or more clients. In such cases, transactions for each account are generally averaged as to price and allocated as to amount in accordance with the daily purchase or sale orders actually placed for each account. Such combined or "batched" trades may be used to facilitate best execution, including negotiating more favorable prices, obtaining more timely or equitable execution or reducing overall commission charges. Oxford may also include employee or related accounts in such aggregate trades, subject to its duty of obtaining best execution.

In addition, Oxford is sometimes unable to acquire substantial positions in certain limited availability securities. In order to avoid allocating tiny blocks of such securities, which may increase settlement and transaction costs, Oxford may use rotation to determine which accounts participate in any given offering as long as all eligible accounts have an opportunity to participate in such transactions over time.

In the case of partial fills of a block transaction, Oxford will allocate to Client accounts first, and exclude employee accounts in the initial allocation.

### **Items 13: Review of Accounts**

Individual portfolio managers review client portfolios on a periodic basis.. Account managers review, among other issues: portfolio performance, withdrawals and additions, and portfolio segmentations and allocation.

Oxford and its personnel utilize performance analysis software including Centerpiece, Advisory World and Morningstar to evaluate client accounts with respect to goals and benchmark performance. Oxford also provides written statements and reports at least quarterly to each client. Written reports on advisory accounts are normally provided monthly by the institution (Schwab or otherwise) maintaining custody of the account. Such reports include, among other items:

- A list of individual securities
- Market value of individual securities

- Dividends and interest to date
- Market value of the portfolio

Clients are encouraged to contact the firm immediately with any changes to their financial situation as such changes may impact the status of their investment account(s).

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

Oxford may compensate others for client referrals in accordance with all state and federal regulations. Referral agents may include third party individuals and unaffiliated entities.

#### **Item 15: Custody**

All client funds and securities are held at qualified custodians, who make account statements available to Oxford. Each private fund client's administrator also provides account statements to Oxford and sends official statements on behalf of the client to each of its investors on a monthly basis or at the end of the respective private fund client's fiscal year. Additionally, all private fund clients are to be audited annually and financial statements are to be sent to all investors within 120 days

In addition to the account statements that clients receive directly from the custodians, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

#### **Item 16: Investment Discretion**

Oxford manages portfolios on a discretionary basis. Clients are encouraged to report any change in their personal information, financial situation and/or investment objectives to the firm immediately.

Clients give us discretionary authority when they sign an investment management agreement with our firm. Any restrictions or limitations to our discretionary authority must be set forth in writing in the investment management agreement or other applicable document.

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

Oxford does not review specific proxy voting material as a matter of course, but only upon request for advice. In instances where the firm has negotiated an exception to normal policy, the firm may vote certain proxies. Accordingly, the firm maintains records reflecting how votes are cast. All voting is made with respect to the firm's policy of fair and equal treatment to clients and their accounts.

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment

assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, bankruptcy proceedings or other related type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

<b>Item 18: Financial Information</b>
---------------------------------------

Oxford has no financial condition that impairs its ability to meet contractual and commitments to clients. Furthermore, the firm has not been the subject of a bankruptcy proceeding.

# **Oxford Asset Management, LLC**

**CRD # 114571  
SEC # 801-69005**

**James Gerard Palumbo  
CRD # 2623916**

3827 N. 10th St. Suite 104  
McAllen, TX 78501  
Phone: (956) 618-5600  
Fax: (956) 467-5374

[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**Issue Date: November 2014**

**This brochure supplement provides information about James Gerard Palumbo that supplements the Oxford Asset Management, LLC brochure. You should have received a copy of that brochure. Please contact James Gerard Palumbo, Chief Compliance Officer, if you did not receive Oxford Asset Management, LLC's brochure or if you have any questions about the contents of this supplement.**

***Additional information about James Gerard Palumbo is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)***

## **Item 2: Educational Background and Business Experience**

**Name:** James Gerard Palumbo, Member and CCO  
CRD# 2623916

**Year Born:** 1961

**Education:** Pinecrest Theological Seminary, 1982  
Lakeshore High School, 1979

**Business Experience:**

- 05/1996 to Present: Oxford Asset Management, LLC, Investment Advisor Representative.
- 01/2007 to 09/2007: SWS Financial Services, General Securities Representative.
- 10/2002 to 12/2006: American General Securities, Inc., General Securities Representative.
- 02/2000 to 04/2003: Valic Financial Advisors, Inc., General Securities Representative.
- 12/1995 to 10/2002: Franklin Financial Services Corp., General Securities Representative.
- 03/1998 to 02/2000: Capital Brokerage Corp., General Securities Representative.

**Licenses:** Series 7 and 63 examinations passed,  
General Lines and Group 1 Legal Reserve

## **Item 3: Disciplinary Information**

Mr. Palumbo does not have any disciplinary information to disclose.

## **Items 4 & 5: Other Business Activities and Additional Compensation**

In addition to his advisory duties on behalf of Oxford, Mr. Palumbo is the founder, shareholder, Vice President and also a licensed insurance agent with OneSource Financial Services. In consideration for his insurance work, Mr. Palumbo is paid on a commission basis. Clients should be aware that a certain conflict of interest exists where clients utilize Mr. Palumbo's additional services, particularly where such services will incur additional cost to the client, as the receipt of commissions for the sale of insurance products gives Mr. Palumbo an incentive to recommend investment products based on the compensation received rather than on the client's needs. Questions related to this arrangement may be addressed directly with Mr. Palumbo. Mr. Palumbo is subject to, and is expected to adhere to, the firm's Code of Ethics.

Mr. Palumbo does not receive any economic benefit from a non-advisory client for the provision of advisory services.

<b>Item 6: Supervision</b>
----------------------------

Mr. Palumbo is supervised by the Investment Committee of Oxford Asset Management, LLC. The Investment Committee supervises Mr. Palumbo, monitors the advice he provides to clients by requiring that he adhere to our firm's policies and procedures, including our Code of Ethics, and by performing various periodic reviews and routine oversight of his activities as they relate to Oxford Asset Management, LLC and its clients.

# **Oxford Asset Management, LLC**

**CRD # 114571  
SEC # 801-69005**

**Cheri Carol Palumbo  
CRD # 4543577**

3827 N. 10th St., Suite 104  
McAllen, TX 78501  
Phone: (956) 618-5600  
Fax: (956) 467-5374  
[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**Issue Date: November 2014**

*This brochure provides information about the qualifications and business practices on the following individual as a representative of Oxford Asset Management, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and this representative is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*



<b>Item 2: Educational Background and Business Experience</b>
---

**Name:** Cheri C. Palumbo, Manager, Member  
CRD# 4543577

**Year Born:** 1961

**Education:** MA from the University of Texas, Pan American 1996  
BA from Texas A and M, 1987

**Business Experience:**

- 01/2006 to Present: Oxford Asset Management, LLC, Member/Principal

<b>Item 3: Disciplinary Information</b>
---

Mrs. Palumbo does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

<b>Items 4 &amp; 5: Other Business Activity and Additional Compensation</b>
---

Mrs. Palumbo is also a General Partner of OneSource Investment Partners, LLP, a private fund as defined under SEC Rule 203(b)(3)-1. Accordingly, Mrs. Palumbo may share in any profit distributions from same.

<b>Item 6: Supervision</b>
----------------------------

James Palumbo is the member, CCO and an owner of Oxford and maintains responsibility to supervise the operation of the Firm. This supervision extends to the ongoing review of the Firm's business practices and monitoring the advice given to clients. Questions related to the operation of the Firm may be directed to Mr. Palumbo at the phone number listed on the cover of this brochure supplement.

# **Oxford Asset Management, LLC**

**CRD # 114571**  
**SEC # 801-69005**

**Jose Guadalupe Longoria, Jr.**  
**CRD # 2624333**

3827 N. 10<sup>th</sup> St.,  
Suite 104  
McAllen, TX 78501  
Phone: (956) 618-5600  
Fax: (956) 467-5374  
[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**Issue Date: December 2016**

*This brochure provides information about the qualifications and business practices on the following individual as a representative of Oxford Asset Management, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and this representative is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

**Item 2: Educational Background and Business Experience**

**Name:** Jose Guadalupe Longoria, Jr.

CRD# 2624333

**Year Born:** 1952

**Education:** Attended Texas A&M University 1971-1974  
Roma High School, 1971

**Business Experience:**

- 2006 to Present: Oxford Asset Management, LLC,  
Investment Advisor Representative.
- 02/2007 to 06/2009: SWS Financial Services,  
General Securities Representative.
- 05/2006 to 12/2006: American General Securities, Inc.,  
General Securities Representative.
- 07/2003 to 05/2006: United Securities Alliance, Inc.,  
General Securities Representative.

**Licenses:** Series 6, 7 and 63 examinations

**Item 3: Disciplinary Information**

Mr. Longoria has the following legal, civil, criminal, regulatory, or disciplinary history to report at this time:

*Customer Dispute - Denied*

A customer purchased \$600,000 life insurance policy in December of 1998, in the life of her mother. Customer alleges that was misrepresented guaranteed death benefit and amount of premium to be paid. Customer wants all premiums paid refunded. Alleged damages in the amount of \$150,000.00. The complaint was received on 03/22/2001. The complaint was denied on 06/06/2001.

**Items 4 & 5: Other Business Activity and Additional Compensation**

Mr. Longoria is also a separately licensed insurance agent. In consideration for his insurance based work, Mr. Longoria is paid on a commission basis. Clients should be aware that a certain conflict of interest may exist where clients utilize Mr. Longoria's advisory and insurance, based offerings-particularly where such services will incur additional cost to the client. Questions related to this arrangement may be addressed directly with Mr. Longoria. Clients are also encouraged to review the firm's Code of Ethics.

**Item 6: Supervision**

Mr. James Palumbo is the member, CCO and an owner of Oxford and maintains responsibility to supervise the operation of the Firm. This supervision extends to the ongoing review of the Firm's business practices and monitoring the advice given to

clients. Questions related to the operation of the Firm may be directed to Mr. Palumbo at the phone number listed on the cover of this brochure supplement.

# **Oxford Asset Management, LLC**

**CRD # 114571  
SEC # 801-69005**

**Stephen Morgan Pease  
CRD # 4667224**

1150 A Main Ave  
Durango, CO 81301  
Phone: (970) 375-1291  
Fax: (970) 797-1776  
[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**Issue Date: December 2016**

*This brochure provides information about the qualifications and business practices on the following individual as a representative of Oxford Asset Management, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and this representative is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

## **Item 2: Educational Background and Business Experience**

**Name:** Stephen Morgan Pease  
CRD# 4667224

**Year Born:** 1957

**Education:** Colorado School of Mines, Bachelor of Science in Geophysical Engineering  
Durango High School, 1975

**Business Experience:**

- 2008 to Present: Oxford Asset Management, LLC, Investment Advisor Representative.
- 01/2007 to 10/2007: SWS Financial Services, General Securities Representative.
- 08/2003 to 12/2006: American General Securities, Inc., General Securities Representative.

**Licenses/Professional Designations:** Series 7 and 63 examinations  
Certified Financial Planner (CFP™)

- **CFP™** - The Certified Financial Planner designation is awarded by the Certified Financial Planner Board of Standards ([www.cfp.net](http://www.cfp.net)) to those candidates that have successfully completed a rigorous course of study. The Board further requires charter holders to maintain certain ethical and professional standards of excellence.

## **Item 3: Disciplinary Information**

Mr. Pease does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

## **Items 4 & 5: Other Business Activity and Additional Compensation**

Mr. Pease is also a separately licensed insurance agent. In consideration for his insurance based work, Mr. Pease is paid on a commission basis. Clients should be aware that a certain conflict of interest exists where clients utilize Mr. Pease's advisory and insurance, based offerings-particularly where such services will incur additional cost to the client. Questions related to this arrangement may be addressed directly with Mr. Pease. Clients are also encouraged to review the firm's Code of Ethics.

## **Item 6: Supervision**

Mr. James Palumbo is the member, CCO and an owner of Oxford and maintains responsibility to supervise the operation of the Firm. This supervision extends to the ongoing review of the Firm's business practices and monitoring the advice given to clients. Questions related to the operation of the Firm may be directed to Mr. Palumbo at the phone number listed on the cover of this brochure supplement.

# **Oxford Asset Management, LLC**

**CRD # 114571**  
**SEC # 801-69005**

**David Wayne Smiley**  
**CRD # 5483164**

1150 A Main Avenue  
Durango, CO 81301  
Phone: (970) 375-1291  
Fax: (970) 797-1776  
[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**Issue Date: December 2016**

*This brochure provides information about the qualifications and business practices on the following individual as a representative of Oxford Asset Management, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and this representative is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

<b>Item 2: Educational Background and Business Experience</b>
---

**Name:** David Wayne Smiley  
CRD# 5483164

**Year Born:** 1956

**Education:** Illinois State University, MS in Biological Science, 1981  
Miami University, B.A., 1978  
Bishop Luers High School, 1974

**Business Experience:**

- 2007 to Present: Oxford Asset Management, LLC,  
Investment Advisor Representative.
- 1993 to 2007: Amgen, Process Development Scientist

**Licenses:** Series 65 examination

<b>Item 3: Disciplinary Information</b>
---

Mr. Smiley does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

<b>Items 4 &amp; 5: Other Business Activity and Additional Compensation</b>
---

Mr. Smiley is also a separately licensed insurance agent. In consideration for his insurance based work, Mr. Smiley is paid on a commission basis. Clients should be aware that a certain conflict of interest exists where clients utilize Mr. Smiley's advisory and insurance, based offerings-particularly where such services will incur additional cost to the client. Questions related to this arrangement may be addressed directly with Mr. Smiley. Clients are also encouraged to review the firm's Code of Ethics.

<b>Item 6: Supervision</b>
----------------------------

Mr. James Palumbo is the member, CCO and an owner of Oxford and maintains responsibility to supervise the operation of the Firm. This supervision extends to the ongoing review of the Firm's business practices and monitoring the advice given to clients. Questions related to the operation of the Firm may be directed to Mr. Palumbo at the phone number listed on the cover of this brochure supplement.



# **Oxford Asset Management, LLC**

**CRD # 114571**  
**SEC # 801-69005**

**David Wayne Varisco**  
**CRD # 2353742**

334 E Farrel Rd., Suite E  
Lafayette, LA 70508  
Phone: (337) 233-4589  
Fax: 866-484-4953  
[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**Issue Date: December 2016**

*This brochure provides information about the qualifications and business practices on the following individual as a representative of Oxford Asset Management, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and this representative is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

<b>Item 2: Educational Background and Business Experience</b>
---

**Name:** David W. Varisco, Investment Advisor Representative  
CRD # 2353742

**Year Born:** 1957

**Education:** University of Louisiana, Lafayette, 1975-1978

**Business Experience:**

- 2006 to Present: Oxford Asset Management, LLC, Investment Advisor Representative.
- 10/2002 to 10/2006: American General Securities Corp, General Securities Representative.

**Licenses:** Series 66 examination

<b>Item 3: Disciplinary Information</b>
---

Mr. David Varisco does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

<b>Items 4 &amp; 5: Other Business Activity and Additional Compensation</b>
---

Mr. Varisco is also a separately licensed insurance agent. In consideration for his insurance based work, Mr. Varisco is paid on a commission basis. Clients should be aware that a certain conflict of interest exists where clients utilize Mr. Varisco's advisory and insurance, based offerings-particularly where such services will incur additional cost to the client. Questions related to this arrangement may be addressed directly with Mr. Varisco. Clients are also encouraged to review the firm's Code of Ethics.

<b>Item 6: Supervision</b>
----------------------------

Mr. James Palumbo is the member, CCO and an owner of Oxford and maintains responsibility to supervise the operation of the Firm. This supervision extends to the ongoing review of the Firm's business practices and monitoring the advice given to clients. Questions related to the operation of the Firm may be directed to Mr. Palumbo at the phone number listed on the cover of this brochure supplement.

# **Oxford Asset Management, LLC**

**CRD # 114571**  
**SEC # 801-69005**

**Brandon Varisco**  
**CRD # 5534021**

113 N. Main St.  
Breaux Bridge, LA 70517  
Phone: (337) 296-3773  
Fax: 866-484-4953  
[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**Issue Date: December 2016**

*This brochure provides information about the qualifications and business practices on the following individual as a representative of Oxford Asset Management, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and this representative is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

<b>Item 2: Educational Background and Business Experience</b>
---

**Name:** **Brandon Varisco**, Investment Advisor Representative  
CRD # 5534021

**Year Born:** 1982

**Education:** University of Phoenix, Currently enrolled

**Business Experience:**

- 2008 to Present: Oxford Asset Management, LLC,  
Investment Advisor Representative.
- 2001 to Present: Active Duty with 82<sup>nd</sup> Airborne Division

**Licenses:** Series 65 Examination

<b>Item 3: Disciplinary Information</b>
---

Mr. Brandon Varisco does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

<b>Items 4 &amp; 5: Other Business Activity and Additional Compensation</b>
---

Mr. Varisco is also a separately licensed insurance agent. In consideration for his insurance based work, Mr. Varisco is paid on a commission basis. Clients should be aware that a certain conflict of interest exists where clients utilize Mr. Varisco's advisory and insurance, based offerings-particularly where such services will incur additional cost to the client. Questions related to this arrangement may be addressed directly with Mr. Varisco. Clients are also encouraged to review the firm's Code of Ethics.

<b>Item 6: Supervision</b>
----------------------------

Mr. James Palumbo is the member, CCO and an owner of Oxford and maintains responsibility to supervise the operation of the Firm. This supervision extends to the ongoing review of the Firm's business practices and monitoring the advice given to clients. Questions related to the operation of the Firm may be directed to Mr. Palumbo at the phone number listed on the cover of this brochure supplement.

# **Oxford Asset Management, LLC**

**One Source Wealth Advisors**

**CRD # 114571**

**SEC # 801-69005**

**Scott A. Rader**

**CRD # 5842833**

1580 S. Main St. Suite 100

Boerne, TX 78006

Phone: (210) 833-2648

Fax: (956) 467-5374

[www.oxfordassetmanagement.net](http://www.oxfordassetmanagement.net)

**Issue Date: December 2016**

*This brochure provides information about the qualifications and business practices on the following individual as a representative of Oxford Asset Management, LLC. This information is provided as a supplement to the Form ADV Part 2A which has been provided for your review. Should you have any questions about this supplement, or if you have not received the Form ADV Part 2A please contact the firm immediately.*

*The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Please note, where this brochure supplement may use the terms "registered investment adviser" and/or "registered", registration itself does not imply a certain level of skill or training.*

*Additional information about the firm and this representative is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)*

<b>Item 2: Educational Background and Business Experience</b>
---

**Name:** Scott A. Rader, Investment Advisor Representative  
CRD # 5842833

**Year Born:** 1960

**Education:** Bob Jones University, Jan 1982, BA  
Bob Jones University, August 1983 MA, Pastoral Studies

**Business Experience:**

- 10/2013 to Present: Oxford Asset Management, LLC,  
Investment Advisor Representative.
- 09/2010 to 10/2013: Edward Jones,  
General Securities  
Representative.
- 11/2001 to 10/2014 Distinct Impressions
- 08/2005 to 08/2010 Delta Children's Product
- 02/2004 to 08/2010 Motodiscovery

**Licenses:** Series 7 and 66 examinations

<b>Item 3: Disciplinary Information</b>
---

Mr. Scott does not have any legal, civil, criminal, regulatory, or disciplinary history to report at this time.

<b>Items 4 &amp; 5: Other Business Activity and Additional Compensation</b>
---

Mr. Rader is also a separately licensed insurance agent. In consideration for his insurance based work, Mr. Rader is paid on a commission basis. Clients should be aware that a certain conflict of interest exists where clients utilize Mr. Rader's advisory and insurance, based offerings-particularly where such services will incur additional cost to the client. Mr. Rader has also obtained a national certification as a Motorcycle Safety Foundation Rider Coach. He will receive income for coaching the MSF course or Harley Davidson Riding Academy Course, and in doing so, encourage student's to become motorcycle riders and potential Harley Davidson enthusiasts. This may also cause a conflict of interest. Questions related to this arrangement may be addressed directly with Mr. Rader. Clients are also encouraged to review the firm's Code of Ethics.

<b>Item 6: Supervision</b>
----------------------------

Mr. James Palumbo is the member, CCO and an owner of Oxford and maintains responsibility to supervise the operation of the Firm. This supervision extends to the ongoing review of the Firm's business practices and monitoring the advice given to clients. Questions related to the operation of the Firm may be directed to Mr. Palumbo at the phone number listed on the cover of this brochure supplement.

## Oxford Asset Management, LLC Privacy Policy

Oxford Asset Management, LLC knows that your privacy is important. You have received this notice as required by law and because you are a customer. This notice will advise you of the types of Nonpublic Personal Information we collect, how we use it, and what we do to protect your privacy.

“Nonpublic Personal Information” refers to personally identifiable information that is not available to the public.

All Client information is considered strictly confidential and will not be divulged, except as required by law or with specific authorization of the Client. We restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you. We maintained physical, electronic, and procedural safeguards to guard your nonpublic personal information. Our employees are bound by a strict confidentiality agreement. Any violation of that agreement would result in the prompt termination of employment with our firms.

☐ The types of Nonpublic Personal Information we collect depends on the products we offer to you and may include your: names, address; Social Security Number; account balances; income; assets; insurance premiums; coverage and beneficiaries; credit reports; marital status; and payment history.

☐ We restrict access to Nonpublic Personal Information to those Employees, Representatives, Agents, or Selected Third Parties who provide service to you and who have been trained to handle Nonpublic Personal Information as described in this notice.

☐ We do not share Nonpublic Personal Information about you except as allowed by law.

☐ The types of companies and persons to whom we may disclose Nonpublic Personal Information as permitted by law include: government agencies, regulators, broker dealers, investment companies, custodians, banks, attorneys; trustees; and third-party administrators.

☐ Our privacy policy applies, to the extent required by law.

☐ You will be notified if our privacy changes.

**This Privacy Notice is given to you for your information only. You do not need to call or take any action.**

October 8, 2015