

**ITEM 1. COVER PAGE FOR PART 2A APPENDIX 1 OF FORM ADV:  
WRAP FEE PROGRAM BROCHURE**

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**JANUARY 2021**

**Omega Financial Group's Wrap Fee Program**

**Sponsored By:**



**812 ANACAPA STREET  
SANTA BARBARA, CA 93101**

**FIRM CONTACT:  
BRYAN REINHARD, CHIEF COMPLIANCE OFFICER**

**FIRM WEBSITE ADDRESS:  
WWW.OMEGAFINGROUP.COM**

This wrap fee program brochure provides information about the qualifications and business practices of Omega Financial Group, LLC. If you have any questions about the contents of this brochure, please contact Bryan Reinhard, Chief Compliance Officer, at (805) 617-4363 or by email at [bryan.reinhard@omegafingroup.com](mailto:bryan.reinhard@omegafingroup.com). 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 Omega Financial Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD#: 164147.

Please note use of the term "registered investment adviser" and description of Omega Financial Group, LLC and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates which advise you for more information on the qualifications of our firm and its employees.

**ITEM 2. MATERIAL CHANGES TO FORM ADV PART 2A APPENDIX 1:  
WRAP FEE PROGRAM BROCHURE**

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**Omega Financial Group, LLC** is required to advise you of any material changes to our Wrap Fee Program Brochure (“Wrap Brochure”) from our last annual update, identify those changes on the cover page of our Wrap Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Wrap Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Wrap Brochure, and we must provide the date of the last annual update of our Wrap Brochure. Please note we do not have to provide this information to a client or prospective client who has not received a previous version of our Wrap Brochure.

**Previous Annual Amendment Filing Date: 03/16/2020**

Since our last annual amendment filing, there have been no material changes to our Wrap Brochure.

### ITEM 3. TABLE OF CONTENTS

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## **ITEM 4. SERVICES, FEES AND COMPENSATION**

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Omega Financial Group's Wrap Fee Program is an investment advisory program sponsored by Omega Financial Group LLC, an independent registered investment adviser with the Securities and Exchange Commission.

A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management and/or advice concerning selection of other advisers, and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). This may result in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

We recommend that clients custody their accounts with Charles Schwab & Co., Inc. ("Schwab") or Fidelity Brokerage Services ("Fidelity"). Schwab does not charge transaction fees for U.S. listed equities and exchange traded funds. Fidelity does not charge transaction fees for U.S. listed equities and exchange traded funds to clients who opt into electronic delivery of statements or maintain at least \$1 million in assets at Fidelity. Since we pay the transaction fees charged by the chosen custodian to clients participating in our wrap fee program, we are incentivized to recommend U.S. listed equities and exchange traded funds over other types of securities in order to reduce our costs. To mitigate this conflict, our firm will recommend the type of security that we believe to be in the client's best interest.

### **Wrap Fee Program**

Our Wrap Comprehensive Portfolio Management service encompasses asset management as well as providing financial planning/financial consulting to clients. It is designed to assist clients in meeting their financial goals through the use of financial investments. We conduct at least one, but sometimes more than one meeting (in person if possible, otherwise via telephone conference) with clients in order to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what we learn, we propose an investment approach to the client. We may propose an investment portfolio, consisting of exchange traded funds, mutual funds, individual stocks or bonds, or other securities. Upon the client's agreement to the proposed investment plan, we work with the client to establish or transfer investment accounts so that we can manage the client's portfolio. Once the relevant accounts are under our management, we review such accounts on a regular basis and at least quarterly. We may periodically rebalance or adjust client accounts under our management. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify us so that we can consider such information in managing the client's investments.

### **Fee Schedule**

We charge an advisory fee of 1.50% of assets under management or a \$10,000 per year minimum flat fee, whichever is greater, for our Wrap Comprehensive Portfolio Management service. Accounts over \$2,000,000 may be subject to a lower fee percentage based on the complexity of the services

offered. The minimum annual flat fee will not exceed 3% of a client's assets under management. Our firm's fees are billed on a pro-rata annualized basis monthly in advance based on the value of your account on the last day of the previous month. The Client may make additions to the Account at any time. Additional assets received into the Account after it is opened will be included in the fee calculation for the following month. The Client may withdraw Account assets upon notice to the Adviser, subject to the usual and customary securities settlement procedures. No fee adjustments will be made for partial withdrawals or for Account appreciation or depreciation within a billing period.

Upon the client's authorization, a qualified custodian will deduct advisory fees from the client's account and pay directly to our firm the management fee for each calendar year month. The custodian will send clients a monthly statement showing all amounts paid from the account, including all management fees paid by the custodian to our firm.

### **Other Types of Fees & Expenses**

You may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm.

Our investment advisory representatives receive a portion of the advisory fee that you pay us, either directly as a percentage of your overall fee or as their salary from our firm. In cases where our investment advisory representatives are paid a percentage of your overall advisory fee, this may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, we may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement if your account is not actively traded.

### **Terminations and Refunds**

In the event that you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close out your account and process a pro-rata refund of unearned advisory fees.

## **ITEM 5. ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS**

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Types of clients we typically manage wrap fee accounts on behalf of, include:

- Individuals and High Net Worth Individuals
- Trusts, Estates or Charitable Organizations
- Corporations, Limited Liability Companies and/or Other Business Types

Our firm requires a minimum account balance of \$1,000,000 for our Wrap Comprehensive Portfolio Management service. This minimum account balance requirement is negotiable and may be waived for individuals who are active accumulators.

## **ITEM 6. PORTFOLIO MANAGER SELECTION AND EVALUATION**

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Our firm and its related persons may act as portfolio managers for this wrap fee program. This may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services. Our investment advisor representatives (“IARs”) are subject to individual licensing requirements as imposed by state securities boards. Our firm is required to confirm or update each IAR’s Form U4 on an annual basis. IAR supervision is conducted by our Chief Compliance Officer or management personnel.

### **Advisory Business**

See Item 4 of this Wrap Fee Program Brochure for a full description of our Wrap Comprehensive Portfolio Management service. Additionally, we offer individualized investment advice to our clients. We usually do not allow clients to impose restrictions on investing in certain securities or types of securities due to the level of difficulty this would entail in managing their account. In rare instances, we may allow restrictions.

### **Participation in Wrap Fee Programs**

We do not currently offer a wrap fee program to new clients. We only offer our wrap fee program to legacy clients who are already in the wrap fee program. Our wrap fee and non-wrap fee accounts are managed on an individualized basis according to the client’s investment objectives, financial goals, risk tolerance, etc. We do not manage wrap fee accounts in a different fashion than non-wrap fee accounts.

### **Performance-Based Fees and Side-by-Side Management**

We do not charge performance fees to our clients.

### **Methods of Analysis, Investment Strategies and Risk of Loss**

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

*Charting.* In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.

*Fundamental Analysis.* We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

*Technical Analysis.* We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company.

This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

*Cyclical Analysis.* In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

### **Investment Strategies We Use:**

We use our proprietary STATES OF THE **WORLD WEALTH MANAGEMENT®** and **OPTIMIZED WEALTH INTEGRATION®** investment strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations.

Our strategies are based on possible known outcomes rather than attempting to predict particular outcomes of financial markets. To do this, we allocate a client's holdings across different assets that have returns tied explicitly to different states (i.e. possible outcomes) of the financial world. For example, we have a strategy designed to survive precipitous market drops (i.e., **PROTECTED VALUE®**), another to earn modest returns during flat market periods (i.e., **TOTAL RETURN®**), and another to thrive during strong market return periods (i.e., **DIFFUSION™**). Our wealth management services are thus in sharp contrast to the conventional approach of simply assuming some return across assets and holding a static asset allocation of various traditional investments (e.g., 60% S&P500 and 40% intermediate US bonds).

**PROTECTED VALUE®** - This strategy is designed to protect a portfolio during steep declines in the stock market. We use call options and short term debt instruments to create a loss floor on a portfolio, typically targeted, depending on the client, in the 0-15% range. On the upside, we target a capture of 40-60% of the positive return. The name of the strategy is derived from the mathematical concept of absolute value---converting negative values into positive ones while still maintaining the sign of positive values.

**TOTAL RETURN®** - This strategy is designed to garner modest returns in those environments where stocks have roughly a zero return. This is accomplished through a proprietary covered put and covered call writing strategy on the S&P500 stock market index. The ratio of puts and calls changes dynamically, depending on market sentiment. Thus, returns and losses are muted but income is enhanced such that in those zero return environments, clients still potentially earn modest returns, which are targeted at 4-6% per annum—hence, the strategy name.

**DIFFUSION™** - This strategy creates an investment that tends to fall in line with the stock market when it falls in value, but tends to increase at a greater rate when the stock market increases in value. In particular, the strategy is a unique blend of short-term investments and smaller capitalization equity investments. This creates a “barbell” of risk that yields a similar overall risk to the stock market but with improved upside. Thus, the positive returns become more diffuse, as the name of the strategy suggests.

### *Additional Proprietary Methods*

Further, we combine advances in academia with financial practice to better form strategic financial and investment advice for clients. This takes the form of using certain methods (e.g., customized monte carlo simulations and econometric analysis) and unique data (e.g., natural language processing derived data and proprietary academic data) from top tier academics. This approach

enables Omega to tie all of the financial pieces of the puzzle together when greater complexity is involved.

**Risk of Loss:**

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

**Voting Client Securities**

We do not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

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**ITEM 7. CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGER(S)**

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All accounts are managed by our in-house licensed IARs. The IAR selected to manage the client's account(s) or portfolio(s) will be privy to the client's investment goals and objectives, risk tolerance, restrictions placed on the management of the account(s) or portfolio(s) and relevant client notes taken by our firm. Please see our firm's Privacy Policy for more information on how our firm utilizes client information.

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**ITEM 8. CLIENT CONTACT WITH PORTFOLIO MANAGER(S)**

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Clients are always free to directly contact their portfolio manager(s) with any questions or concerns about their portfolios or other matters.

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**ITEM 9. ADDITIONAL INFORMATION**

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**Disciplinary Information**

We have determined that our firm and management have no disciplinary information to disclose.

**Financial Industry Activities & Affiliations**

A representative of our firm is an insurance agent/broker. He may offer insurance products and receive normal and customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation that he may earn.



Dylan Minor, Bryan Reinhard, and Robert Schultz are managing members of Argos Global Advisors, LLC (CRD# 287672), a related registered investment adviser that manages the Argos Total Return Fund, LP. Accredited investors of Omega Financial Group, LLC may be solicited to participate in the Argos Total Return Fund, LP. An investment in the private fund involves a high degree of risk and should only be considered by sophisticated investors able to assume the risks of loss (including the risk of loss of such investor's entire investment) and illiquidity inherent with these types of investments. This offering does not waive our firm's fiduciary duty to its clients or infringe upon any clients right to remedy under state or federal laws.

### **Code of Ethics, Participation or Interest in Client Transactions & Personal Trading**

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts<sup>1</sup>. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

### **Review of Accounts**

We review accounts on at least a quarterly basis for our Wrap Comprehensive Portfolio Management clients. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Only our Financial Advisors or Portfolio Managers will conduct reviews.

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<sup>1</sup> For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

We do not provide written reports to clients, unless asked to do so. Verbal reports to clients take place on at least an annual basis when we contact clients.

### **Client Referrals and Other Compensation**

Our firm does not receive any compensation from National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity").

Our firm may recommend that clients establish brokerage accounts with Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), registered broker-dealers, Members SIPC, to maintain custody of Clients' assets and to effect trades for their accounts. Our firm is independently owned and operated and not affiliated with Schwab. Our firm may also recommend that Clients establish accounts with firms other than Schwab.

Our firm places trades for its Clients' accounts subject to its duty to seek best execution and its other fiduciary duties. Our firm may use broker-dealers other than Schwab to execute trades for client accounts maintained at Schwab, but this practice may result in additional costs to clients so that we are more likely to place trades through Schwab rather than other broker-dealers. Schwab's execution quality may be different than other broker-dealers.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Some of the products, services and other benefits provided by Schwab benefit us and may not benefit our firm's client accounts. Our recommendation/requirement that a client place assets in Schwab's custody may be based in part on benefits Schwab provides to us, and not solely on the nature, cost or quality of custody and execution services provided by Schwab.

Schwab also makes available to our firm other products and services that benefit us but may not benefit clients' accounts. These benefits may include national, regional or specific to our firm, educational events organized and/or sponsored by Schwab Institutional. Other potential benefits may include occasional business entertainment of personnel of our firm by Schwab Institutional personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist us in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of our fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of our firm's accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional also makes available to us other services intended to help our firm manage and further develop its business enterprise. These services may include professional compliance, legal and business

consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to our firm by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. While, as a fiduciary, Our firm endeavors to act in its clients' best interests, our recommendation/requirement that clients maintain their assets in accounts at Schwab may be based in part on the benefit to our firm of the availability of some of the foregoing products and services and other arrangements 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.

### **Referral Fees**

We do not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940.

### **Financial Information**

We are not required to provide financial information to our clients because:

- We do not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 (six) months.
- In compliance with SEC Rule 206(4)-2(b)(4)(i), the Argos Total Return Fund, LP sends a financial statement, audited by a registered PCAOB accountant, to each Fund investor within 120 days of the Fund's fiscal year end.
- We do not have a financial condition or commitment that impairs its ability to meet contractual and fiduciary obligations to clients.
- We have never been the subject of a bankruptcy proceeding.