

# Olivar & Greb Capital Management, LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Olivar & Greb Capital Management, LLC. If you have any questions about the contents of this brochure, please contact us at (508) 598-7590 or by email at: [client.services@olivar-greb.com](mailto:client.services@olivar-greb.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 Olivar & Greb Capital Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Olivar & Greb Capital Management, LLC's CRD number is: 285905.*

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*Registration does not imply a certain level of skill or training.*

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## Item 2: Material Changes

We added tax-filing services to our scope of services and moved principal place of business to our Massachusetts location.

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Olivar & Greb Capital Management, LLC (hereinafter "OAG") is a Limited Liability Company organized in the State of Delaware. The firm was formed in September 2016, and the principal owner is Thomas Greb.

### **B. Types of Advisory Services**

#### ***Portfolio Management Services***

OAG offers ongoing portfolio management services based on the individuals goals, objectives, time horizon, and risk tolerance of each client. OAG creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

OAG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. OAG will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

OAG seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of OAG's economic, investment or other financial interests. To meet its fiduciary obligations, OAG attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, OAG's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is OAG's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

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

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

### ***Services Limited to Specific Types of Investments***

OAG generally limits its investment advice to fixed income securities, equities, ETFs (including ETFs in the gold and precious metal sectors) and non-U.S. securities, although OAG primarily recommends domestic us equities we believe to trade at below its intrinsic value. Stocks are chosen on the basis of low price-to-sales ratio, low debt, high return on equity ratio, and strong product demand. Attention is paid to shares that pay large annual dividends. . OAG may use other securities as well to help diversify a portfolio when applicable.

### **C. Client Tailored Services and Client Imposed Restrictions**

OAG will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by OAG on behalf of the client. OAG may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent OAG from properly servicing the client account, or if the restrictions would require OAG to deviate from its standard suite of services, OAG reserves the right to end the relationship.

We take into account as many aspects as possible to give the client the best investment advice for their situation. We take into account: current and projected cash flows from the clients' salary and other investments, potential inheritance, spouse salary, children/grandchildren education needs, and special needs for family or extended family.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. OAG does not participate in any wrap fee programs.

### **E. Assets Under Management**

OAG has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$6,602,821.00	\$2,047,147.00	May 2021

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Portfolio Management Fees*

Financial Planning, Education Planning, Retirement Planning, Trust & Estate Planning

Total Assets Under Management	Annual Fees
\$0 - \$500,000	1.45%
\$500,001 - \$1,000,000	1.30%
\$1,000,001 - \$2,500,000	1.15%
\$2,500,001 - \$5,000,000	1.05%
\$5,000,000 +	0.95%

Thematic Portfolios & Investment Management Portfolios

Total Assets Under Management	Annual Fees
\$0 - \$10,000,000	.55%, and up to 15% Annual Performance

All clients that are accredited investors in the Thematic and Investment Management Portfolio type are eligible for the 2% & 20% performance pricing.

OAG uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of OAG's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

#### *Performance-Based Fees for Portfolio Management*

Qualified clients will pay an annual fee of up to 2.00% of assets under management along with a 20.00% performance fee based on capital appreciation. If the client's portfolio rises in value, the client will pay 20.00% on that increase in value, but if the portfolio drops in value, the client will not incur a new performance fee until the

portfolio reaches the last highest value, adjusted for withdrawals and deposits, which is generally known as a "high water mark."

The high water mark will be the highest value of the client's account on the last day of any previous quarter, after accounting for the client's deposits or withdrawals for each billing period.

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. This service may be canceled immediately upon written notice. Clients must pay the prorated performance-based fees for the billing period in which they terminate the Investment Advisory Contract up to and including the day of termination.

### ***Financial Planning Fees***

#### **Hourly Fees**

OAG will perform Financial Planning services for a fee of \$1,500 to \$15,000 depending on complexity.

For smaller projects, the negotiated hourly fee for these services is between \$250 and \$500.

Fees for retirement plan surrender services are \$250 up front, and \$250 once the services have been completed.

Clients may terminate the agreement without penalty, for full refund of OAG's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a daily basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

### ***Payment of Performance-Based Portfolio Management Fees***

Performance-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check and wire.

Hourly financial planning fees are paid in arrears upon completion.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by OAG. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

OAG collects its fees in arrears. It does not collect fees in advance.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither OAG nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

OAG manages accounts that are billed on performance-based fees (a share of capital gains on or capital appreciation of the assets of a client) and may as well manage accounts that are not billed on performance-based fees. Managing both kinds of accounts at the same time presents a conflict of interest because OAG and/or its supervised persons have an incentive to favor accounts for which OAG receives a performance-based fee. OAG addresses the conflicts by ensuring that clients are not systematically advantaged or disadvantaged due to the presence or absence of performance-based fees. OAG seeks best execution and upholds its fiduciary duty for all clients. Clients paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

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

OAG generally provides advisory services to the following types of clients:

- ☐ Individuals
- ☐ High-Net-Worth Individuals



For investment management services, OAG generally maintains a minimum of \$500,000 USD. We may accept accounts below this range if the client is adding money to the account regularly and will reach the \$500,000 mark in a reasonable amount of time.

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

### **A. Methods of Analysis and Investment Strategies**

#### *Methods of Analysis*

OAG's methods of analysis include Fundamental analysis and Modern portfolio theory.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

#### *Investment Strategies*

OAG uses long term trading, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **B. Material Risks Involved**

#### *Methods of Analysis*

**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.

**Modern portfolio theory** assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio

exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### ***Investment Strategies***

OAG's use of margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

OAG's use of margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk,

liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Closed End Funds** are used by OAG for some clientele. An investment in a closed-end fund presents a number of risks and is not suitable for all investors. Investors should carefully review the prospectus and consider potential risks before investing in any new offering. A closed-end fund company typically raises money through a share offering to invest in a portfolio of bonds, as well as equities and other security types, with a fixed number of shares. Once the money is raised, the fund does not take in new money or process redemptions. After the closed-end fund goes public, you can buy shares in the secondary market on an exchange, such as the NYSE or NASDAQ, paying the fees that your broker charges for this type of transaction. When you buy shares in a closed-end fund Initial Public Offering (IPO), you'll pay a premium because the fees and expenses paid for the offering come from the capital raised. In other words, if you pay \$10 for a share, the actual amount invested for you will be less than \$10. Until the original listing of a closed-end fund on an exchange, closed-end fund shares will not have a history of public trading. The value of closed-end fund shares is determined by investor demand. This is different from an open-end fund, where price reflects the fund's net asset value (NAV). Closed-end funds may trade at a premium or discount to their net asset value. A significant majority trade at a discount. In general, rising short-term rates will increase the cost of leverage for closed-end funds, which can have significant impact on closed-end fund prices. Leverage tends to increase volatility for closed-end bond funds. Closed-end funds can invest in a higher percentage of illiquid securities than open-end funds and can issue debt and/or preferred shares. Diversification strategies do not ensure a profit and do not protect against losses in declining markets. Fixed-income securities in general are subject to increased loss of principal during periods of rising interest rates. Fixed-income investments are subject to various other risks including changes in credit quality, market valuations, liquidity, prepayments, early redemption, corporate events, tax ramifications, and other factors. Lower-rated securities are subject to greater credit risk, default risk, and liquidity risk.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type

of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither OAG nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither OAG nor its representatives are registered as, or have pending applications to become, a Commodity Trading Advisor.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

As mentioned in Section 4.B, O&G refers clients to an insurance agent (Primer Sol, Inc.) and makes a commission from referrals. In addition, O&G provides tax-filing services of which our firm also makes revenue. These two services present conflicts for our clients that we monitor closely.

Thomas Greb operates as a partner in a private investment firm that makes investments in the US and China. Olivar & Greb Capital Management, LLC always acts in the best interest of the client. All opportunities presented in this investment company are also distributed to accredited investors of Olivar & Greb Capital Management, LLC.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

OAG does not utilize nor select third-party investment advisers. All assets are managed by the OAG investment team. We source parts of our research from Blackrock, and various online publications.

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

### **A. Code of Ethics**

OAG has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. OAG's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

OAG does not recommend that clients buy or sell any security in which a related person to OAG or OAG has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of OAG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of

OAG to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. OAG will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operate to the client's disadvantage when similar securities are being bought or sold. OAG has stringent policies that ensure that all personal trades are approved by the CCO, and that all personal trades will come after the client.

We have strict procedures to ensure that we will act in the best interest of our client at all times, and will not purchase or sell our own shares preemptively before a client. The clients account always comes before any of OAG representatives.

#### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of OAG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of OAG to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, OAG will never engage in trading that operates to the client's disadvantage if representatives of OAG buy or sell securities at or around the same time as clients.

### **Item 12: Brokerage Practices**

#### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on OAG's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and OAG may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in OAG's research efforts. OAG will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

If clients want OAG to directly manage their assets, we will require clients to use Interactive Brokers LLC or Charles Schwab. For self-directed asset management, where OAG will give trading recommendation, the client may use any brokerage. We have terms of business with Globalnet, which gives us access to any individuals who have invested in a plan with Generali, Royal London, or FPI International. We do not use this brokerage to open new accounts, as we have found it to be more expensive and with less access to the markets. Therefore we only use it to manage clients who have been sold it by another advisor.

### ***1. Research and Other Soft-Dollar Benefits***

While OAG has no formal soft dollars program in which soft dollars are used to pay for third party services, OAG may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). OAG may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and OAG does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. OAG benefits by not having to produce or pay for the research, products or services, and OAG will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that OAG’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

### ***2. Brokerage for Client Referrals***

OAG receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

If the clients want OAG to manage their assets directly, OAG will require clients to use a specific broker-dealer (Interactive Brokers or Charles Schwab) to execute transactions. Not all advisers require clients to use a particular broker-dealer.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

OAG does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

# **Item 13: Review of Accounts**

## **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for OAG's advisory services provided on an ongoing basis are reviewed at least Monthly by Thomas Greb, Managing Director, or Kyle Krasker with regard to clients’ respective investment policies and risk tolerance levels. All accounts at OAG are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Thomas Greb, Managing Director or Kyle Krasker. Financial planning clients

are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

Kyle Krasker reviews all trades enacted for clients at least weekly. He is also responsible for various other trading and portfolio management reviews that take place monthly. These include making sure clients are allocated correctly.

#### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, OAG's services will generally conclude upon delivery of the financial plan.

#### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of OAG's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. OAG will also provide at least an annually a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

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

#### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

OAG offers referrals to Primer Sol, Inc., and makes up to 80% of revenue for giving the referral. In addition, OAG has a referral agreement with Quantage, LLC to provide tax-filing services to OAG clients, receiving up to 20% of revenue.

#### **B. Compensation to Non – Advisory Personnel for Client Referrals**

OAG does not directly offer individuals referral fees. Should OAG do so in the future, these individuals would not have access to client information, or have any trading privileges.



## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, OAG will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

OAG provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, OAG generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, OAG's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to OAG. For all clients, whether they are discretionary or not, we spend time and care to ensure that the client is comfortable with their portfolios.

## **Item 17: Voting Client Securities (Proxy Voting)**

OAG will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

OAG neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither OAG nor its management has any financial condition that is likely to reasonably impair OAG's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

OAG has not been the subject of a bankruptcy petition in the last ten years.