

**Part 2A of Form ADV: *Firm Brochure***

**Item 1 Cover Page**

**Archambo Financial Advisors, Inc.(CRD #129927)**

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[12/31/2021](#)

This brochure provides information about the qualifications and business practices of Archambo Financial Advisors, Inc.. If you have any questions about the contents of this brochure, please contact us at 918-336-2222 or [aaron@archambofinancial.com](mailto:aaron@archambofinancial.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.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about Archambo Financial Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 129927.

## **Item 2      Material Changes**

This Firm Brochure, dated 12/31/2021, provides you with a summary of Archambo Financial Advisors, Inc.'s advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform of the revision(s) based on the nature of the information as follows.

1. Annual Update: We are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31. We will provide you with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide you with our revised Brochure that will include a summary of those changes in this Item.
2. Material Changes: Should a material change in our operations occur, depending on its nature we will promptly communicate this change to clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our advisory services or advisory affiliates - any information that is critical to a client's full understanding of who we are, how to find us, and how we do business.

The following summarizes new or revised disclosures based on information previously provided in our Firm Brochure dated 03/08/2022:

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## **Item 4      Advisory Business**

Archambo Financial Advisors, Inc. is a SEC-registered investment adviser with its principal place of business located in Oklahoma. Archambo Financial Advisors, Inc. began conducting business in 2004.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Aaron S Archambo, President

Archambo Financial Advisors, Inc. offers the following advisory services to our clients:

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT**

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable annuities
- Mutual fund shares
- United States governmental securities
- Options contracts on securities

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the clients financials circumstances, we will:

- 1) at least annually, contact each participating client to determine whether there have been any changes in the client's financial situation or investment objectives, and whether the client wishes to impose investment restrictions or modify existing restrictions;
- 2) be reasonably available to consult with the client; and
- 3) maintain client suitability information in each client's file.

## **FINANCIAL PLANNING**

We provide financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.

- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

Typically the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

#### **AMOUNT OF MANAGED ASSETS**

As of 12/31/2021, we were actively managing \$144,878,893 of clients' assets on a discretionary basis.

## **Item 5 Fees and Compensation**

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT FEES**

Our annual fees for Investment Supervisory Services are based upon a percentage of assets under management and generally range from 1.00% to .60%.

The annualized fee for Investment Supervisory Services are charged as a percentage of assets under management, according to the following schedule:

#### **FEE SCHEDULE FOR PORTFOLIO ASSET MANAGEMENT**

## AFA TIERED FEE SCHEDULE

<u>Market Value of Portfolio</u>	<u>Annual Rate</u>
First \$1,000,000	1.0%
Next \$1,000,000	.8%
Over \$2,000,000	.6%

Archambo Financial Advisors, Inc. may impose a minimum fee of \$500 per year.

The quarterly fee is calculated as portfolio asset value times the annual rate, divided by the number of days in the year, then multiplied times the number of days in the quarter ( $QAV \times AR / DIY \times DIQ$ ). Partial quarters will be pro-rated. When clients have multiple accounts, all accounts are totaled based on their end of quarter balance and the total of all accounts is applied to their annual fee structure. The total quarterly fee is then prorated to each of their accounts based on the account's percentage of the total assets.

As AFA offers recommendations for investment in mutual funds, it is sometimes necessary to switch fund families and/or classes of funds to achieve recommended asset allocation and client objectives. There may be occasions where the Client has previously paid a sales charge or could incur a sales charge on redemption of previously purchased shares or could possibly incur sales charges when shares are purchased in another fund company.

Investors holding mutual funds in their portfolio are subject to the management fees charged by any investment company mutual funds held in their portfolio. This fee is separate and distinct from the AFA advisory fee and is paid from the mutual funds' assets directly to the fund's advisor. AFA does not receive any portion of a mutual fund's investment management fee. Investment management fees vary for each fund held by client and is fully disclosed in each fund's prospectus. Investors must factor investment management fees charged by any mutual funds held in their portfolio into their overall determination of total annual cost of their investment program.

**Limited Negotiability of Advisory Fees:** Although Archambo Financial Advisors, Inc. has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

## FINANCIAL PLANNING FEES

Archambo Financial Advisors, Inc.'s Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are calculated and charged on an hourly basis, ranging from \$175 to \$200 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

We may request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$500 for work that will not be completed within six months. The balance is due upon completion of the plan.

The client is billed quarterly in arrears based on actual hours accrued.

## GENERAL INFORMATION

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

***Mutual Fund Fees:*** All fees paid to Archambo Financial Advisors, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

***Additional Fees and Expenses:*** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

***Advisory Fees in General:*** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

***Limited Prepayment of Fees:*** Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.



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

Furthermore, as we also have clients who do not pay performance-based fees, we have an incentive to favor accounts that do pay such fees because compensation we receive from these clients is more directly tied to the performance of their accounts.

Archambo Financial Advisors, Inc. does not charge performance-based fees.

## Item 7 Types of Clients

Archambo Financial Advisors, Inc. provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals

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

### METHODS OF ANALYSIS

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 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.

**Quantitative Analysis.** We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

**Qualitative Analysis.** We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, and predict changes to share price based on that data.

A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

**Asset Allocation.** Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

**Mutual Fund and/or ETF Analysis.** We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

The firm will also use information gathered from financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission and company press releases.

### ***INVESTMENT STRATEGIES***

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

***Long-term purchases.*** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

***Short-term purchases.*** When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

***Risk of Loss.*** Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

## **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 to disclose.

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

Aaron Archambo, Mark Archambo, Debbie Mueggenborg, and Jonathan Russell of Archambo Financial Advisors, Inc. are separately licensed as registered representatives of Dominion Investor Services, Inc. (DOMI), an affiliated broker-dealer through The Financial Industry Regulatory Authority (FINRA) .

Aaron Archambo, President and Mark Archambo, Vice-President are also part of the management personnel for Archambo Financial Advisors, Inc.. As registered representatives of DOMI, we do not have any material conflicts of interest. These individuals, in their separate capacity, can effect securities transactions for which they will receive separate, yet customary compensation.

AFA utilizes DOMI to provide certain services under this contract. These services include but are not limited to performance reporting, administrative support, brokerage and transaction clearing, confirmation delivery and providing monthly or quarterly brokerage account statements. DOMI receives compensation for these services.

Mark Archambo, vice-president of AFA, owns a minority interest in and is a director for AFA's affiliated broker-dealer, Dominion Investor Services, Inc. (DOMI) and its parent firm Dominion Financial Services, Inc. (DFS), spending approximately 2% of his time in this capacity. Mr. Archambo receives no special compensation for this activity but may be paid dividends or distributions by DOMI/DFS from their surplus earnings proportionate to his ownership interest. AFA has negotiated special securities transaction rates for advisory client accounts that are substantially lower than DOMI's full retail commission rates.

AFA will generally discourage the use of broker/dealers other than DOMI (where AFA IAR's are also RR's) to execute client trades. DOMI is an introducing broker/dealer who has established agreements with Hilltop Securities Inc. (hereinafter called HTS), a member of FINRA and SIPC, to provide execution of orders and custody of client's cash and securities.

AFA believes the conflicts of interest in recommending DOMI/HTS as their preferred broker/dealer arrangement is mitigated by improvement in transaction costs to the client, along with transaction speed, reliability, internal audit capability and general efficiency.

DOMI routinely monitors the quality of client trade executions to ensure clients are receiving the best available execution price among the competing stock exchanges and market-makers. Transaction costs paid to HTS and DOMI are fixed flat-rate fees for advisory accounts. Profits or losses associated with managed account transaction fees are paid to and borne by DOMI, not AFA or its IAR's (this includes their separate capacity as RR's of DOMI).

AFA believes the transactions executed through HTS, and the custody and clearing costs available through the DOMI/HTS arrangement have been and remain competitive.

AFA has no "soft dollar" arrangements with HTS or DOMI to provide additional goods or services (such as security research or portfolio software) in exchange for direction of the client's brokerage account. The services used by AFA are available without reservation to all users of the HTS trading platform. As part of its fiduciary obligation to its clients, AFA will monitor transaction-related costs to its client's accounts for reasonableness with prevailing market costs.

AFA is also engaged in a retail securities business for its non-advisory clients. AFA advisory personnel, in their capacity as registered representatives (RR) of DOMI place retail securities trades for non-advisory client accounts for usual and customary commission compensation.

While Archambo Financial Advisors, Inc. and these individuals endeavor at all times to put the interest of the clients first as part of our fiduciary duty, clients should be aware that the receipt of additional

compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

Mark Archambo is also an employee in the accounting firm of Stotts, Archambo, Mueggenborg & Barclay, P.C., CPA'S, (SAMB) where he is an individually licensed and practicing Certified Public Accountant providing accounting services for separate and typical compensation.

SAMB typically recommends Archambo Financial Advisors, Inc. to accounting clients in need of advisory services. Conversely, Archambo Financial Advisors, Inc. typically recommends SAMB to advisory clients in need of accounting services. Accounting services provided by SAMB are separate and distinct from our advisory services, and are provided for separate and typical compensation. There are no referral fee arrangements between our firms for these recommendations. No Archambo Financial Advisors, Inc. client is obligated to use SAMB for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by us. SAMB's accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory client's behalf.

These individuals may spend the a portion of their time on their accounting practice.

Mark Archambo - 30-40%

Deborah Mueggenborg - 65-75%

Clients should be aware that the receipt of additional compensation by Archambo Financial Advisors, Inc. and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. Archambo Financial Advisors, Inc. endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

We are aware of the special considerations required under Rule 206(4)-3 of the Investment Advisers Act of 1940. As such, all appropriate disclosure shall be made and all applicable Federal and State laws will be observed.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Archambo Financial Advisors, Inc. and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Archambo Financial Advisors, Inc.'s Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [aaron@archambofinancial.com](mailto:aaron@archambofinancial.com), or by calling us at 918-336-2222.

Archambo Financial Advisors, Inc. and individuals associated with our firm are prohibited from engaging in principal transactions.

Archambo Financial Advisors, Inc. and individuals associated with our firm are prohibited from engaging in agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are separately registered as securities representatives of a broker-dealer, investment adviser representatives of another registered investment adviser, and/or licensed as an insurance agent/broker of various insurance companies. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

## **Item 12 Brokerage Practices**

Archambo Financial Advisors, Inc. does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

Archambo Financial Advisors, Inc. requires that clients provide us with written authority to determine the broker-dealer to use and the commission costs that will be charged to our clients for these transactions.

These clients must include any limitations on this discretionary authority in this written authority statement. Clients may change/amend these limitations as required. Such amendments must be provided to us in writing.

As a matter of policy and practice, Archambo Financial Advisors, Inc. does not generally block client trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price and/or commission rate. Additionally, our clients may not receive volume discounts available to advisers who block client trades.

## **Item 13 Review of Accounts**

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT**

**REVIEWS:** While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least annually. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by: Aaron Archambo, President or Mark Archambo, Vice-President

**REPORTS:** In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide semi-annual reports summarizing account performance, balances and holdings.

### **FINANCIAL PLANNING SERVICES**

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

**REPORTS:** Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

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

It is Archambo Financial Advisors, Inc.'s policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is Archambo Financial Advisors, Inc.'s policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

## **Item 15 Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have actual or constructive custody of client accounts.

## **Item 16 Investment Discretion**

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell



Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

## **Item 17     Voting Client Securities**

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, tender offers, bankruptcy proceedings or other 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.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

## **Item 18     Financial Information**

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Archambo Financial Advisors, Inc. has no such financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Archambo Financial Advisors, Inc. has not been the subject of a bankruptcy petition at any time during the past ten years.

## Item 1 Cover Page

### Part 2B of Form ADV: *Brochure Supplement*

Aaron S Archambo(CRD #2587428)  
310 South Osage  
Bartlesville, OK 74003  
918-336-2222 Phone

Archambo Financial Advisors, Inc.(CRD #129927)  
310 South Osage  
Bartlesville, OK 74003

12/31/2021

This brochure supplement provides information about Aaron S Archambo that supplements the Archambo Financial Advisors, Inc. brochure. You should have received a copy of that brochure. Please contact Aaron Archambo 918-336-2222 if you did not receive Archambo Financial Advisors, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Aaron S Archambo 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:** Aaron S Archambo      **Born:** 1970

### Education

- Southern Nazarene University; B.S., Accounting; 1992

### Business Experience

- Archambo Financial Advisors, Inc.; President; from 01/2016 to Present
- Archambo Financial Advisors, Inc.; Chief Compliance Officer; from 06/2020 to Present
- Archambo Financial Advisors, Inc.; Investment Advisor Representative; from 01/2004 to Present
- Dominion Investor Services, Inc.; Series 7 - General Securities Representative Examination; Registered Representative; from 01/1995 to Present
- First Investment Corporation; Investment Advisor Representative; from 01/1996 to 12/2003
- First Investment Corporation; Planner Assistant; from 10/1992 to 12/1995

### Designations

Aaron S Archambo has earned the following designation(s) and is in good standing with the granting authority:

### CFP(r) - CERTIFIED FINANCIAL PLANNER(TM)

Issued by: [Certified Financial Planner Board of Standards, Inc; 2011](#)

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a [CFP-board registered program](#), or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration

- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2-years

### **Item 3 Disciplinary Information**

Aaron S Archambo has no reportable disciplinary history.

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

#### **A. Investment-Related Activities**

1. Aaron S Archambo is separately licensed as a registered representative of Dominion Investor Services, Inc. (DOMI), an affiliated broker-dealer, through The Financial Industry Regulatory Authority (FINRA). He can affect securities transactions for which he will receive separate, yet customary compensation.

2. Aaron S Archambo receives commissions, bonuses or other compensation on the sale of securities or other investment products.

Clients should be aware that the receipt of additional compensation by Archambo Financial Advisors, Inc. and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. Archambo Financial Advisors, Inc. endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we annually monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

#### B. Non Investment-Related Activities

Aaron S Archambo is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his or her time.

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

Aaron S Archambo does not receive any economic benefit from a non-advisory client for the provision of advisory services.

#### **Item 6 Supervision**

**Supervisor:** Aaron Archambo

**Title:** President

**Phone Number:** 918-336-2222

**Item 1 Cover Page**

**Part 2B of Form ADV: *Brochure Supplement***

Mark W Archambo(CRD #1673061)  
310 South Osage  
Bartlesville, OK 74003  
918-336-2222 Phone

Archambo Financial Advisors, Inc.(CRD #129927)  
310 South Osage  
Bartlesville, OK 74003

12/31/2021

This brochure supplement provides information about Mark W Archambo that supplements the Archambo Financial Advisors, Inc. brochure. You should have received a copy of that brochure. Please contact Aaron Archambo 918-336-2222 if you did not receive Archambo Financial Advisors, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Mark W Archambo 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:** Mark W Archambo      **Born:** 1949

### **Education**

- Southern Nazarene University; Accounting; 1969
- University of Tulsa; Accounting; 1970

### **Business Experience**

- Archambo Financial Advisors, Inc.; Vice-President; from 01/2016 to Present
- Archambo Financial Advisors, Inc.; Chief Compliance Officer; from 01/2004 to 06/2020
- Archambo Financial Advisors, Inc.; Investment Advisor Representative; from 01/2004 to Present
- Stotts, Archambo, Mueggenborg and Barclay P.C., CPAs; CPA; from 08/2014 to Present
- Dominion Financial Services, Inc.; Director; from 01/1995 to Present
- Dominion Investor Services, Inc.; Director; from 01/1993 to Present
- Dominion Investor Services, Inc.; Series 7 - General Securities Representative Examination; Registered Representative; from 01/1991 to Present
- Dominion Portfolio Management, Inc.; Director; from 01/1995 to Present
- Dominion Portfolio Management, Inc.; Investment Advisor Representative; from 01/1995 to 01/2019
- Archambo Financial Advisors, Inc.; President; Investment Advisor Representative; from 01/2004 to 12/2015
- Archambo & Mueggenborg, P.C., CPA's; President; from 01/1988 to 07/2014
- First Investment Corporation; President; from 01/1989 to 12/2003

### **Designations**

Mark W Archambo has earned the following designation(s) and is in good standing with the granting authority:

**CFP(r) - CERTIFIED FINANCIAL PLANNER(TM)**

Issued by: [Certified Financial Planner Board of Standards, Inc.](#)

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a [CFP-board registered program](#), or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2-years

Certified Public Accountant; Oklahoma Accountancy Board; 8/9/1974

**Certified Public Accountant (CPA)** CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for license as a CPA generally include minimum college [education](#) (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum [experience](#) levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the



AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

**Personal Financial Specialist (PFS)** The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, fulfill 3,000 hours of personal financial planning business experience, complete 80 hours of personal financial planning CPE credits, pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's *Code of Professional Conduct*, and is encouraged to follow AICPA's *Statement on Responsibilities in Financial Planning Practice*. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the [AICPA](#).

### **Item 3 Disciplinary Information**

Mark W Archambo has no reportable disciplinary history.

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

#### **A. Investment-Related Activities**

1. Mark W Archambo is separately licensed as a registered representative of Dominion Investor Services, Inc. (DOMI), an affiliated broker-dealer, through The Financial Industry Regulatory Authority (FINRA). These individuals, in their separate capacity, can effect securities transactions for which they will receive separate, yet customary compensation.

Mark Archambo, vice-president of AFA, owns a minority interest in and is a director for AFA's prime broker, Dominion Investor Services, Inc. (DOMI) and its parent firm Dominion Financial Services, Inc. (DFS), spending approximately 2% of his time in this capacity. Mr. Archambo receives no special compensation for this activity but may be paid dividends or distributions by DOMI/DFS from their surplus earnings proportionate to his ownership interest. AFA has negotiated special securities transaction rates for

advisory client accounts that are substantially lower than DOMI's full retail commission rates.

2. Mark W Archambo receives commissions, bonuses or other compensation on the sale of securities or other investment products.

Clients should be aware that the receipt of additional compensation by Archambo Financial Advisors, Inc. and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. Archambo Financial Advisors, Inc. endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we annually monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

#### B. Non Investment-Related Activities

Mark W. Archambo is also an employee in the accounting firm of Stotts, Archambo, Mueggenborg & Barclay, P. C. , CPA'S, (SAMB) where he is an individually licensed and practicing Certified Public Accountant providing accounting services for separate and typical compensation.

SAMB typically recommends Archambo Financial Advisors, Inc. to accounting clients in need of advisory services. Conversely, Archambo Financial Advisors, Inc. typically recommends SAMB to advisory clients in need of accounting services. Accounting services provided by SAMB are separate and distinct from our advisory services, and are provided for separate and typical compensation. There are no referral fee arrangements

between our firms for these recommendations. No Archambo Financial Advisors, Inc. client is obligated to use SAMB for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by us. SAMB's accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory clients' behalf.

Mark Archambo spends approximately 30-40% of his time in fulfilling his duties in the accounting practice.

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

Mark W Archambo does not receive any economic benefit from a non-advisory client for the provision of advisory services.

#### **Item 6 Supervision**

**Supervisor:** Aaron Archambo

**Title:** Compliance Officer

**Phone Number:** 918-336-2222

**Item 1: Cover Page**

**Part 2B of Form ADV: *Brochure Supplement***

Deborah E Mueggenborg(CRD #4473013)  
310 South Osage  
Bartlesville, OK 74003  
918-336-2222 Phone

Archambo Financial Advisors, Inc.(CRD #129927)  
310 South Osage  
Bartlesville, OK 74003

12/31/2021

This brochure supplement provides information about Deborah E Mueggenborg that supplements the Archambo Financial Advisors, Inc. brochure. You should have received a copy of that brochure. Please contact Aaron Archambo 918-336-2222 if you did not receive Archambo Financial Advisors, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Deborah E Mueggenborg 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:** Deborah E Mueggenborg      **Born:** 1953

### Education

- Southwestern Oklahoma State University; BS, Accounting; 1975

### Business Experience

- Stotts, Archambo, Mueggenborg, & Barclay P.C., CPAs; CPA, President, Managing Partner; from 08/2014 to Present
- Archambo Financial Advisors, Inc.; Investment Advisory Representative; from 01/2004 to Present
- Dominion Investor Services, Inc.; Series 7 - General Securities Representative Examination; Registered Representative; from 01/2002 to Present
- Archambo & Mueggenborg, P.C.; Vice-President; from 01/1989 to 07/2014
- First Investment Corporation; Investment Advisor Representative; from 01/2002 to 12/2003

### Designations

Deborah E Mueggenborg has earned the following designation(s) and is in good standing with the granting authority:

- Certified Public Accountant; Oklahoma Accountancy Board; 1989
- In order to become a CPA in the United States, the candidate must sit for and pass the Uniform Certified Public Accountant Examination, which is set by the American Institute of Certified Public Accountants and administered by the National Association of State Boards of Accountancy. Eligibility to sit for the Uniform CPA Exam is determined by individual State Boards of Accountancy. Typically the requirement is a U.S. bachelor's degree which includes a minimum number of qualifying credit hours in accounting and business administration with an additional 1 year study. All CPA candidates must pass the Uniform CPA Examination to qualify for a CPA certificate and license (i.e., permit to practice) to practice public accounting. CPAs are required to take continuing education courses in order to renew their license. Requirements vary by state. The vast majority of states require 120 hours of CPE every 3 years with a minimum of 20 hours per calendar year. The requirement can be fulfilled through attending live seminars, webcast seminars, or through self-study (textbooks, videos, online courses, all of which require a test to receive credit). As part of the CPE requirement, most states require their CPAs to take an ethics course

during every renewal period. Ethics requirements vary by state, and the courses range from 2 to 8 hours

### **Item 3 Disciplinary Information**

Deborah E Mueggenborg has no reportable disciplinary history.

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

#### **A. Investment-Related Activities**

1. Deborah E Mueggenborg is licensed as a registered representative of Dominion Investor Services, Inc. (DOMI), an affiliated broker-dealer, through The Financial Industry Regulatory Authority (FINRA). She can effect securities transactions for which she will receive separate, yet customary compensation.

2. Deborah Mueggenborg receives commissions, bonuses or other compensation on the sale of securities or other investment products.

Clients should be aware that the receipt of additional compensation by Archambo Financial Advisors, Inc. and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. Archambo Financial Advisors, Inc. endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we annually monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

## B. Non Investment-Related Activities

Deborah E Mueggenborg is also the managing partner in the accounting firm of Stotts, Archambo Mueggenborg & Barclay P.C., CPA'S, (SAMB) where she is an individually licensed and practicing Certified Public Accountant providing accounting services for separate and typical compensation.

SAMB typically recommends Archambo Financial Advisors, Inc. to accounting clients in need of advisory services. Conversely, Archambo Financial Advisors, Inc. typically recommends SAMB to advisory clients in need of accounting services. Accounting services provided by SAMB are separate and distinct from our advisory services, and are provided for separate and typical compensation. There are no referral fee arrangements between our firms for these recommendations. No Archambo Financial Advisors, Inc. client is obligated to use SAMB for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by us. SAMB's accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory clients' behalf.

Deborah Mueggenborg spends approximately 65-75% of her time in fulfilling her duties in the accounting practice.

## Item 5 Additional Compensation

Deborah E Mueggenborg does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## Item 6 Supervision

**Supervisor:** Aaron Archambo

**Title:** President

**Phone Number:** 918-336-2222

Item 1 Cover Page

**Part 2B of Form ADV: *Brochure Supplement***

Jonathan S Russell(CRD #7428994)  
310 South Osage Ave.  
Bartlesville, OK 74003  
918-336-2222

Archambo Financial Advisors, Inc.(CRD #129927)  
310 S Osage  
Bartlesville, OK 74003

02/23/2022

This brochure supplement provides information about Jonathan S Russell that supplements the Archambo Financial Advisors, Inc. brochure. You should have received a copy of that brochure. Please contact Aaron Archambo 918-336-2222 if you did not receive Archambo Financial Advisors, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Jonathan S Russell is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



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

**Full Legal Name:** Jonathan S Russell      **Born:** 1994

### **Education**

- The University of Oklahoma; B.A., Mathematics; 2018
- The University of Oklahoma; B.A., Economics; 2018

### **Business Experience**

- Archambo Financial Advisors, Inc.; Investment Advisor Representative; from 01/01/2022 to Present
- Dominion Investor Services, Inc.; Series 7 - General Securities Representative Examination; Registered Representative; from 10/01/2021 to Present

## **Item 3 Disciplinary Information**

Jonathan S Russell has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Jonathan S Russell is separately licensed as a registered representative of Dominion Investor Services, Inc. (DOMI), an affiliated broker-dealer, through The Financial Industry Regulatory Authority (FINRA). He can affect securities transactions for which he will receive separate, yet customary compensation.

2. Jonathan S. Russell receives commissions, bonuses or other compensation on the sale of securities or other investment products.

Clients should be aware that the receipt of additional compensation by Archambo Financial Advisors, Inc. and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. Archambo Financial Advisors, Inc. endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;

- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we annually monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

#### **B. Non Investment-Related Activities**

Jonathan S Russell is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his or her time.

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

Jonathan S Russell does not receive any economic benefit from a non-advisory client for the provision of advisory services.

#### **Item 6 Supervision**

**Supervisor:** Aaron Archambo

**Title:** President

**Phone Number:** 918-336-2222