



Oregon Pacific Financial Advisors, Inc.

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March 23, 2023

This Brochure provides information about the qualifications and business practices of Oregon Pacific Financial Advisors, Inc. ["OPFA"], CRD #110176. If you have any questions about the contents of this Brochure, please contact us at 541-772-1116. 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.

OPFA is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about OPFA also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

Since our previous filing on March 31, 2022, OPFA has not made any material amendments.

Currently, our Brochure may be requested by contacting Royal Standley at 541-772-1116 or Royal@opfa.com. Our Brochure is also available on our web site www.opfa.com/disclosures, also free of charge.

Additional information about OPFA is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with OPFA who are registered, or are required to be registered, as investment adviser representatives of OPFA.

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Item 4 – Advisory Business

“What types of services can I expect to receive?”

Oregon Pacific Financial Advisors (OPFA), is a SEC Registered Investment Adviser with its principal place of business located in Medford, Oregon. OPFA began conducting business in June 14, 1995.

Royal R. Standley, President/CEO of OPFA is the firm's principal shareholder (i.e., those individuals and/or entities controlling 25% or more of this company).

OPFA, through its Advisory Associates, will typically provide a variety of financial planning services, principally advisory in nature, to individuals or families regarding the management of their financial resources, based upon an analysis of client's needs. Generally, such financial planning services will involve preparing a financial program for a client based on the client's financial circumstances and objectives. This information normally would cover present and anticipated assets and liabilities, including insurance, savings, investments, and anticipated retirement or other employee benefits.

The program developed for the clients will usually include general recommendations for a course of activity or specific actions to be taken by the clients. For example, recommendations may be made that the clients obtain insurance or revise existing coverage, establish an individual retirement account, increase or decrease funds held in savings accounts or invest funds in securities. The Advisory Associates on behalf of the Advisor may develop investment related tax strategies or estate plans for clients or refer clients to an accountant or attorney.

The Advisory Associates on behalf of the Advisor may also create a cash flow analysis or work with and advise the clients as to the rearrangement of cash flow in order to fund certain long-term objectives such as buying a house, planning for college, retirement, etc.

The Advisor will generally contact the client at least annually, and will make inquiry regarding changes in the client's financial situation and needs or investment objectives. In addition, the representative will meet with the client at least annually to review any changes in the client's financial situation, needs or investment objectives, as well as the performance of the programs managed by the third-party investment advisor. A representative will be available for the client's consultation during normal business hours.

In all cases, the client does receive regular account statements from those companies where investments are held. There are various programs and each has its own guidelines with respect to minimum investment, fees, structure, and reporting. The client is informed of such guidelines and specifics prior to entering into an advisory program.

Oregon Pacific Financial Advisors, Inc. offers its clients a choice of investment advisory products and services. With respect to the asset management activity, a quarterly statement will be provided to the client. Fees are not based upon capital gains or capital appreciation of assets. Oregon Pacific Financial Advisors shall not have custody of any cash or securities of any client. As of December 31, 2022 OPFA is managing \$120,456,645 in assets under management, \$100,984,182 on a discretionary basis and \$19,472,463 on a non-discretionary basis.

“How does my advisor manage my investments?”

Oregon Pacific Financial Advisors uses a variety of advisory programs including various Third Party Money Managers as well as SEI Asset Management.

Third-Party Money Manager Programs

Oregon Pacific Financial Advisors has relationships with various Third Party Money Managers (TPMM) to assist them with their clients’ investment needs. These TPMMs are registered as investment advisors and/or sponsors of turn-key wrap fee programs and may offer a wide range of advisory services including asset allocation, market timing and portfolio management. In these programs, OPFA will refer the ongoing and active management of your assets to a TPMM. Your IAR will assist you in choosing the most appropriate TPMM and/or TPMM investment strategy.

In all cases, you will receive additional disclosure materials concerning the TPMM and its advisory program(s) and will enter into a separate investment advisory agreement with the TPMM and with Oregon Pacific Financial Advisors. OPFA will refer you to TPMMs who are appropriately registered with state or federal securities agencies as required by law. The TPMM manages your accounts in accordance with the disclosures set forth in the TPMM’s disclosure documents. The TPMM typically assumes discretionary authority over the account. OPFA and its advisors assist the client with the selection of a TPMM and its respective advisory program based upon your individual financial needs, goals and objectives.

Various investment strategies are used in the management of client accounts. Each OPFA Representative is responsible for recommending the TPMM and management style based on each client’s individual financial situation, goals and objectives.

Your OPFA Rep will typically:

- gather information from you about your financial situation, investment objectives, investment experience, risk tolerance, other investments, liquidity needs, tax status and investment time horizon and any reasonable restrictions that you want to impose on the management of the account;
- periodically review reports provided to you by the TPMM;
- contact you at least annually to review your financial situation and objectives;
- communicate information to the TPMM as warranted; and
- assist you in understanding and evaluating the services provided by the TPMM.

You must notify your OPFA Rep of any changes in your financial situation, investment objectives or account restrictions.

SEI Asset Management Programs

Oregon Pacific Financial Advisors (the “Adviser”) participates in The SEI Asset Allocation Program, which is offered to individuals, high net worth individuals, defined benefit plans, participant and non-participant directed defined contribution plans, institutions, endowments, and foundations.

With the SEI Asset Allocation Program, the Adviser serves as the investment adviser to the investor, and is responsible for analyzing the investor’s current financial situation, return expectations, risk tolerance, time horizon, and asset class preference, pursuant to the Adviser’s

investment advisory agreement. Based upon the investor's information, the Adviser and the investor select an investment strategy and choose from one of many mutual fund asset allocation models, which may be provided by SEI Investments Management Corporation ("SIMC"), or purchase the individual mutual funds.

The Adviser will allocate the assets placed in the investor's account among the SEI Funds (a family of mutual funds advised by SIMC) in accordance with the investment strategy, goal or model selected by the investor. The investor, through the Adviser, may adjust their asset allocation to help ensure that the mix reflects the objectives of the chosen strategy. The investor may, at any time, impose reasonable restrictions on the management of his/her account or choose a new investment strategy. For participant-directed plans, assets will be invested in the SEI Asset Allocation mutual funds and other style-specific SEI Funds (if applicable).

In accordance with the investor's investment objectives, the Adviser may also allocate assets placed in the investor's account among the SEI Funds through SEI's Private Client Models, which reflect SIMC's institutional asset allocation models more aligned with individual investors' goals. SIMC expects to make changes to the Private Client Models periodically to incorporate changes to the mutual fund asset allocations underlying the models. Upon consent from the Adviser (on behalf of the investor), these asset allocation changes will be made to the investor's accounts invested in the Private Client Models.

The SEI Funds are administered, distributed, and in some cases advised by SIMC or its affiliates for which it is paid fees as disclosed in the SEI Funds' prospectuses. The prospectus(es) should be read carefully by all investors before investing in the SEI Funds.

The SEI Distribution-Focused Strategies (the "DFS Program") are designed to actively manage a broadly diversified portfolio of assets, bolstered by expert manager selection, portfolio construction and oversight. The DFS Program was built to generate a consistent level of distributions. In addition to achieving distribution objectives, it is designed to provide a degree of principal preservation by leaving a positive residual value at the end of the strategies stated investment horizon. Advisers can use these results to balance their clients' distribution objectives against their principal preservation goals. The Adviser participates in the "MAP Program and DFS Program (together, the "Managed Account Program"). To participate in the Managed Account Program, the Adviser, SIMC and the individual investors execute a Managed Account Agreement providing for the management of certain investor assets in accordance with the terms thereof. Pursuant to a Managed Account Agreement, the investor appoints the Adviser as its investment adviser to assist the investor in selecting an asset allocation strategy, which would include the percentage of investor assets allocated to a designated Managed Account Portfolio and may include the percentage of assets allocated to a portfolio of mutual funds advised by SIMC or an affiliate of SIMC. The investor appoints SIMC to manage the assets in each Managed Account Portfolio in accordance with a strategy selected by the investor together with the Adviser. SIMC may delegate its responsibility for selecting particular securities to one or more portfolio managers. For the DFS Program, SIMC is responsible for selecting securities (generally SEI's proprietary mutual funds) underlying each portfolio in accordance with its investment strategies, and, therefore, selecting the securities into which the investor's assets will be invested.

Other Advisory Disclosures

Advisor may provide advice on other interests in partnerships investing in other programs such as alternative energy programs, equipment leasing, research and development programs, cable television, and fast food franchising.

Item 5 – Fees and Compensation

“What fees will I be charged?”

Financial Planning Fees

Although in many cases the individual advisor is fully compensated for planning services by way of a fee-based asset management, Advisor may also be compensated for planning services by the client on an hourly or pre-determined fixed fee basis. Advisor does complete financial plans for a set fee and performs financial consulting work on an hourly basis periodically. The charge for a financial plan typically ranges between \$1,000 and \$5,000 but may be more or less, depending on the nature and complexity of each client’s circumstances. This fee is based on the hourly rate of the individual advisor and their base rate for hourly work which ranges between \$150 and \$300 based on experience and education. The flat fee that is quoted is a fixed estimate of the time it will take to complete the plan and give the client a fixed cost to pay for the services provided. 50% of the estimated fee will be due upon signing the advisory agreement, with the balance (based on actual hours) due upon presentation of the plan to the clients. Typically the financial plan will be presented to the clients within 90 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the clients.

If a client does not receive the brochure at least 48 hours prior to entering into an investment advisory agreement, the advisory client has a right to terminate the contract without penalty within five business days after entering into the contract. If client decides to terminate this agreement after five (5) business days, then any fees paid but not earned will be refunded. The charge for hourly work ranges from \$150 to \$300 per hour. Advisor’s set fees and hourly charges may be negotiable depending on the client’s preferences, services to be performed, and the circumstances. Lower fees for comparable services may be available from other sources.

Third-Party Money Manager Program Fees

You will receive full disclosure of the recommended TPMM’s fee schedule, services rendered, termination provisions and other aspects of the TPMM’s program at the time of referral, by receiving from your advisor a copy of the relevant TPMM’s disclosure brochure. TPMM fees are fully disclosed in the recommended TPMM’s disclosure brochure and set forth in the TPMM’s account opening documents and your agreement with the TPMM. The advisor is paid a solicitation or sub-advisor fee (referral fee) from the TPMM for recommending the TPMM’s services and establishing client accounts with the TPMM. This referral fee is also fully disclosed in these materials. The referral fees that the advisor receives are typically a portion of the total fee charged to you by the TPMM and will vary depending on the program you select, the size of your account and the services rendered to you. The advisory fees charged to your account may not exceed 3% of assets under management. The maximum charge for advisory fees at 3% of assets under management may be higher than normally charged in the industry and similar services may be offered by another adviser at a lower fee. In addition, OPFA provides the following fee schedule to clients:

For SEI Private Trust, Orion Portfolio Solutions & AssetMark Accounts:

1.00% OF FIRST \$ 1,000,000

.90% OF NEXT \$ 500,000

.80% OF NEXT \$ 500,000

.70% OF NEXT \$ 500,000

.50% ABOVE \$ 3,000,000

*ASSESSED QUARTERLY IN ARREARS FOR SEI & ASSETMARK
ASSESSED MONTHLY IN ARREARS FOR ORION*

For American Funds Accounts:

1.00% Annual Management Fee

ASSESSED MONTHLY IN ARREARS FOR AMERICAN FUNDS

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported shall be valued at the last reported sale price on the principal market in which they are traded (or, if there shall be no sales on such date, then at the mean between the closing bid and asked prices on such date). Other readily marketable securities and investments shall be priced using a pricing service or through quotations from one or more dealers or investment custodians. Notwithstanding the above, fees are negotiable.

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

“Does OPFA charge fees based on performance?”

OPFA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

“Who becomes a client of OPFA?”

OPFA provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations and endowments.

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

“What methods does OPFA use to recommend my investment strategy?”

We do not use technical analysis or charting. We do use a fundamental approach, such as economic conditions, earnings, industry outlook, politics (as it relates to the investment), historical data, price-earnings ratios, dividends, general level of interest rates, company

management and tax benefits. We attempt to select clients' investments to harmonize with their financial objectives. OPFA does not guarantee investment performance.

We generally make long-term recommendations with occasional short-term strategies as the circumstances may indicate. Our investment philosophy focuses on proper diversification and asset allocation over the long haul. Short-term strategies employed may include dollar cost averaging programs, temporary/interim repositioning of assets, and tax-advantaged strategies (e.g. selling short against the box, and security sales to realized losses with subsequent repurchases in 31 days). Investing in securities involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

“How do I know if OPFA and its Advisors have ever had any disciplinary issues?”

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events for the past ten years that would be material to your evaluation of OPFA or the integrity of OPFA's management. OPFA has no disciplinary issues to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

“Does OPFA have activities other than advisory business?”

The principals and many, but not all, of the associates of the Advisor are registered representatives of United Planners Financial Services of America, a registered broker dealer, member of FINRA/SIPC. If the client chooses to implement advice through the advisory associates of the Advisor, the Broker Dealer will be United Planners Financial Services of America with transactions cleared through the Pershing Division of Donaldson, Lufkin, & Jenrette Securities Corporation (“Pershing”).

As the advisors of OPFA are also Registered Representative of United Planners, this creates a conflict of interest due to the receipt of compensation through 12b-1 fees, commissions and other fees. It is OPFA's policy to place our client's interest above our own interests. The Advisors will disclose these conflicts of interest as they arise and advise the client accordingly.

Because OPFA and its IARs receive compensation from the TPMMs for referring clients and because such compensation may differ depending upon the individual agreement with each TPMM, OPFA and/or its IARs may have an incentive to recommend one of these TPMMs over other TPMMs with which it has less favorable compensation arrangements. OPFA policy requires IARs to recommend TPMMs on the basis of your interest and not on the amount of compensation earned.

The Advisors of OPFA may be appointed with several insurance companies and may be able to receive separate compensation for transactions implemented through various insurance companies. Members are not obligated to use any company for insurance product purchases, and may work with any insurance agent they choose. Insurance compensation will be separate and distinct from any fees charged by OPFA.

Item 11 – Code of Ethics

“Does OPFA have a Code of Ethics?”

The Adviser or its Advisory Representatives may buy or sell securities identical to those recommended to customers for their personal accounts.

It is the expressed policy of the Adviser that its Advisory Representatives may not purchase or sell any individual stock or bond prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such Advisory Representatives benefiting from transactions placed on behalf of advisory accounts.

As these situations represent a conflict of interest, the Adviser has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) A Director, officer or Advisory Representatives shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her affiliation with the Adviser or United Planners, unless the information is also available to the investing public on reasonable inquiry. No person shall prefer his or her own interest to that of the advisory Clients.
- 2) All Clients are fully informed that certain individuals may receive separate compensation when effecting transactions during the implementation process.
- 3) The Adviser emphasizes the unrestricted right of the Clients to decline to implement any advice rendered, except in situations where a Third Party Advisory Service is granted discretionary authority in the Client’s account.
- 4) The Adviser requires that all individuals must act in accordance with all applicable Federal regulations governing registered investment advisory practices.
- 5) Any individual not in observance of the above may be subject to termination.

Item 12 – Brokerage Practices

“Who does OPFA clear their transactions through?”

If a client chooses to engage with OPFA, transactions will be through SEI. They have their own brokerage practices that you may review in their respective disclosure brochures. As a result, OPFA does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

As a matter of policy and practice, OPFA 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.

OPFA participates in the institutional customer program offered by TD Ameritrade Institutional, a division of TD Ameritrade Inc., Member FINRA/SIPC/NFA (“TD Ameritrade”),

an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers services to independent investment advisers which include custody of securities, trade execution, clearance and settlement of transactions. OPFA receives some benefits from TD Ameritrade through our participation in the program.

OPFA participates in TD Ameritrade's Institutional customer program and we may recommend TD Ameritrade to our clients for custody and brokerage services. There is no direct link between our firm's participation in the program and the investment advice we give to our clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors.

OPFA's receipt of Additional Services raises conflicts of interest. In providing Additional Services to our firm, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, our client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with OPFA, in its sole discretion, provided certain conditions are met.

OPFA's receipt of Additional Services does not diminish our duty to act in the best interests of our clients, including seeking best execution of trades for client accounts.

Item 13 – Review of Accounts

“How are my accounts reviewed at OPFA?”

Investment Advisory Accounts

Reviews: While the underlying securities within the Investment Advisory accounts are continually monitored, the frequency of reviews for these accounts is often determined based on the individual investments objectives. However, no less than annually you will be contacted to arrange a review of your accounts. In these meetings (or in between these meetings) it is important to notify us of any changes to your personal situation, as this may impact your portfolio strategy. 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, significant contributions/withdrawals, the market, political or economic environment.

These accounts are reviewed by a designated investment advisor.

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

“Can I get paid for referring my friends to OPFA?”

OPFA does not pay individuals or entities for client referrals nor do we receive compensation from any person regarding client referrals; however we do receive the majority of our clients through referrals and introductions by our existing clients.

Item 15 – Custody

“Is my money deposited at OPFA?”

OPFA does not take custody of client’s funds or securities.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client’s investment assets. OPFA urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

“Can OPFA do trades for me without calling me first?”

OPFA usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, OPFA observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, OPFA’s authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to OPFA in writing.

Item 17 – Voting Client Securities

“Can OPFA vote my proxy ballots for me?”

As a matter of firm policy and practice, OPFA does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. OPFA may provide advice to clients regarding the clients’ voting of proxies.

Item 18 – Financial Information

“Is OPFA financially stable?”

OPFA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. OPFA does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

ADV Part 2B

Registered Investment Advisors

1. Educational and Business Background

Royal Ray Standley, ChFC®, AIF®, CLTC, CRPS®

Year of Birth: 1977

Education:

Illinois Valley High School, Cave Junction, OR / attended 94-96 / graduated 1996 /

Eastern Oregon University /attended 96-98/

Designations:

College for Financial Planning/ Certified Retirement Plan Specialist / 2010

Individuals who hold the CRPS® designation have completed a course of study encompassing design, installation, maintenance and administration of retirement plans. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

The American College / Chartered Financial Consultant, 2014

To receive a Huebner School designation (including ChFC®, CLF®, CLU®, RICP®, and WMCP®), you must successfully complete all courses in your selected program, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures.

The WMCP® designation has an additional requirement of passing the final exam to receive the WMCP® designation. Course requirements must be successfully completed in order to sit for the final exam.

Experience

Three years of full-time business experience is required for all Huebner School designations. The three-year period must be within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience. Part-time qualifying business experience is credited toward the three-year requirement on an hourly basis, with 2,000 hours representing the equivalent of one year full-time experience. The following activities meet the required business experience qualifications included in the certification process.

Accredited Investment Fiduciary® (AIF®), 2018

The AIF designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF Code of Ethics. In order to maintain the AIF designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 (fi360) company).

Certified Long-Term Care (CLTC), 2006

The CLTC Board of Standards, Inc. grants the Certified Long-Term Care (CLTC) designation. Applicants must complete a two-day class on long-term care with a curriculum including

understanding the impact of long-term care on the insured's family and their retirement portfolio, extended care services and facilities currently available to older Americans, financial sources that pay for long-term care, tax advantages of tax-qualified policies, and the ethical promotion of long-term care insurance. Applicants must pass a final course examination to acquire the CLTC designation. CLTC designees must complete a continuing education course on ethics every two years.

Business:

Oregon Pacific Financial Adv, Inc. /Medford, OR/Financial Advisor/02/2006 –Present
United Planners/Medford, OR/Broker Dealer/Reg. Rep/07/2009-Present
SagePoint Financial/Medford, OR/Broker Dealer/Reg. Rep/02/2006 – 07/2009
Great Pacific Trading Co. /Grants Pass, OR/Commodity Broker/03/2001-08/2005
Towne Centre Real Estate/Grants Pass, OR/Real Estate Agent/12/1998-06/2001

2. Disciplinary Information

Royal Standley has not been subject to disciplinary action or have been found liable or guilty in any investment-related civil, criminal or arbitration proceedings in the past ten years.

3. Other Business Activities

Royal Standley is a Registered Representative offering Securities through United Planners Financial Services "United Planners". Royal Standley is also licensed to sell life and health insurance. In this capacity, Royal Standley may recommend investment products and receive transactions commissions if products are purchased through United Planners. Thus, a conflict of interest exists between the interests of Royal Standley and those of the advisory clients, creating an incentive for recommending investment products based on the compensation received, rather than on a client's needs. However, clients are under no obligation to act upon any recommendations of OPFA or to effect any transactions through the firm if they decide to follow the recommendations (unless they have granted our firm discretionary investment authority). OPFA does not limit its recommendations to products or services offered by United Planners and ensures that all recommendations are appropriate for a client's specific needs. Clients have the option to purchase investment products recommended through other financial institutions not affiliated with IAR. Insurance activities constitute no more than 10% of the advisor's time during trading hours.

4. Additional Compensation

Royal Standley does not receive additional compensation from non-clients for providing investment advisory services.

5. Supervision

Royal Standley is responsible for supervising the advisory business of Oregon Pacific Financial Advisors. They use a combination of tools to monitor the activity of Advisory accounts and provide guidance of advice given to clients. They also review client communications through the mail or email.