

# OAKMONT

PART 2A OF FORM ADV

August 16, 2023

## Firm Brochure

This brochure provides information about the qualifications and business practices of Oakmont Advisory Group, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 505-821-6966 or by email at [david@oakmontadvisory.com](mailto:david@oakmontadvisory.com).

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Oakmont Advisory Group, LLC (IARD#158890) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

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# Material Changes

## Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

## Material Changes since the Last Update

Since the last annual updating amendment filing of this brochure on March 22, 2022, there have been no material changes.

## Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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# Advisory Business

## Firm Description

Oakmont Advisory Group, LLC (“Advisor”), formerly known as Hicks Advisory Group, LLC was founded in 2011. Ralph Hicks’ share of ownership is 50% and David Hicks’ share of ownership is 50%.

Advisor provides personalized confidential financial planning and investment management primarily to individuals, trusts, estates or charitable organizations and corporations or business entities. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and legacy planning.

Advisor is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, or other commissioned products. The president of Advisor has an affiliated business, Oakmont Insurance, LLC, that does sell insurance products. Together, they operate under the doing business as name (“dba”) of Oakmont Advisory Group.

Advisor does not act as a custodian of client assets.

An evaluation of each client’s initial situation is provided to the client, often in the form of a net worth statement, risk analysis, or similar document. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed.



## **Types of Advisory Services**

Advisor provides investment supervisory services, also known as asset management, and furnishes financial planning and investment advice through consultations.

### **Asset Management:**

Advisor offers discretionary and non-discretionary asset management services to advisory clients. Advisor will provide clients with ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring, and the overall investment program will be based on the above factors.

### **Selection of Other Advisers:**

We may also recommend the services of unaffiliated investment Advisors for asset management services: Altruist, LLC, Dimensional Funds, Vanguard, Gradient Investments and Formula Folio Investments as third-party investment advisers. The Altruist platform is an automated web-based wrap -fee investment management platform consisting of a customized portfolio of investments. We will confirm any unaffiliated investment advisers we recommend are properly registered, notice filed, or exempt from registration or notice filing.

### **Financial Planning and Consulting:**

If financial planning services are applicable, the client will compensate Advisor on a negotiable fixed fee basis described in detail under “Fees and Compensation” section of this brochure. Services include but are not limited to a thorough review of all applicable topics, including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. If a conflict of interest exists between the interests of the investment advisor and the interests of the client, the client is under no obligation to act upon the investment advisor’s recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transactions through Advisor. Financial plans will be completed and delivered inside of ninety (90) days. Clients may terminate advisory services with thirty (30) days written notice.

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

The goals and objectives for each client are documented in our client files.

Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

## **Wrap Fee Programs**

Advisor does not sponsor any wrap fee programs although may recommend wrap fee programs offered by third-party investment advisers.

## **Client Assets Under Management**

As of July 31, 2023, Advisor had \$107,804,446 in client assets under management. \$104,497,941 in discretionary assets under management and \$3,306,505 in non-discretionary assets under management.

# Fees & Compensation

## Method of Compensation and Fee Schedule

Advisor bases its fees on a percentage of assets under management, fixed and hourly fees and solicitor fees from third party investment advisers.

### Asset Management:

Advisor offers discretionary and non-discretionary asset management services to advisory clients. The fees for these services will be based on a percentage of Assets Under Management as follows:

Assets Under Management	Maximum Annual Fee	Monthly Fee
First < \$500,000	1.20%	0.0100%
\$500,001 - \$1,000,000	0.95%	0.0791%
\$1,000,001 - \$3,000,000	0.75%	0.0625%
Over \$3,000,001	0.45%	0.0375%

The annual Fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Advisor, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Fees are billed monthly in arrears based on the amount of assets managed as of the close of business on the last business day of each month.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. Advisor will be entitled to a pro rata fee for the days service was provided in the final month.

**Selection of Other Advisers:**

Advisor may direct clients to third-party investment advisers. OAG will be compensated via a fee share from the advisers to which it directs those clients. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. Fees range from .25%- 1.5%. and are paid monthly in arrears. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

**Financial Planning and Consulting:**

Financial Planning Services are offered based on a negotiable fixed fee between \$600 and \$1500, based on complexity and unique client needs. Prior to the planning process the client will be provided the plan fee. The payments are received in two installments; the first half will be due upon commencement of the plan, with the balance due upon delivery of completed financial plan. Client may cancel within five (5) business days of signing agreement for a full refund. If client cancels after five (5) business days, either client will be entitled to a pro-rata refund, or Advisor will be entitled to a final payment based on percentage of work completed; whichever is applicable.

If Age-Based Financial Planning option is selected, client pays a monthly fee based on their age. This fee structure can be billed monthly or annually.

**Client Payment of Fees**

Asset management fees are billed monthly in arrears, meaning our advisory fee is charged at the end of each month. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery. Under Age-Based Financial planning, a monthly fee billing option could be selected.

**Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover

costs associated with fees assessed by self-regulatory organizations).

For more details on the brokerage practices, see Item 12 of this brochure.

## **Prepayment of Client Fees**

Fees for financial plans are billed 50% in advance.

## **External Compensation for the Sale of Securities to Clients**

Advisor does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of Advisor.

# Performance-Based Fees

## Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Advisor does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client.

# Types of Clients

## Description

Advisor generally provides investment advice to individuals, pension and profit-sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

## Account Minimums

Advisor typically requires a household minimum of \$100,000 to open up accounts, but some third-party investment advisers may have minimums which would be disclosed in the documents provided by the third-party investment adviser. Minimum requirements may be waived at the discretion of the Advisor.

# Methods of Analysis, Investment Strategies and Risk of Loss

## Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

## Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement, Risk Tolerance or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).



## Security Specific Material Risks

Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

# Disciplinary Information

## **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

## **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

## **Self-Regulatory Organization Enforcement Proceedings**

Without admitting or denying the findings, Ralph Hicks signed a Letter of Acceptance, Waiver and Consent with FINRA on March 28, 2013. The order alleges that Mr. Hicks did not obtain prior approval on advertising by a registered principal of his employing firm before distribution to clients. Mr. Hicks has agreed to the following sanctions: a twenty business-day suspension from associating with a FINRA member and \$10,000 fine payable upon re-association with a member firm.

# Other Financial Industry Activities and Affiliations

## Broker-Dealer or Representative Registration

Neither Advisor nor any of its employees are registered representatives of a broker-dealer.

## Futures or Commodity Registration

Neither Advisor nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

## Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Member Ralph Hicks and Chief Compliance Officer David B. Hicks have financial industry affiliated businesses as insurance agents. Less than 50% of their time is spent in their insurance practices.

From time to time, Ralph Hicks and David Hicks offer clients advice or products from this activity. Clients are not required to purchase any products. They receive separate, compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives Ralph Hicks and David Hicks an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Ralph and David Hicks have a fiduciary responsibility to place the interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Ralph Hicks and David Hicks are also co-owners of Lowkey Holdings, LLC, a real estate holdings company.

## **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Advisor may at times utilize the services of Third Party Money Managers or Platform Sponsor to manage client accounts. In such circumstances, Advisor will share in the Third Party and Platform Sponsor asset management fee, if applicable. This situation creates a conflict of interest as Advisor has an incentive to recommend third-party advisors that provide Advisor with a larger fee share. However, when referring clients to a third-party money manager, the client's best interest will be the main determining factor of Advisor. The fees charged by the Third Party Money Managers may include management fees, transaction costs, and certain other administrative fees that may be assessed as part of a Wrap Fee Program.

The relationship between Advisor and the Third Party Money Manager or Platform Sponsor will be disclosed to the client in writing prior to commencement of the services. This agreement will include the name of the assisting investment advisor representative, the name of the third-party money manager, the nature of the relationship and affiliation if any, a statement of compensation and amount, the terms of the compensation arrangement, and any additional fee(s) charged to clients above the normal fee of the third-party money manager as a result of retaining the third-party money manager through Advisor.

Advisor does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement.

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

## Code of Ethics Description

The employees of Advisor have committed to a Code of Ethics. The purpose of our Code of Ethics is to ensure that when employees buy or sell securities for their personal account, they do not create actual or potential conflict with our clients. We do not allow any employees to use nonpublic material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Advisor's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Advisor may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Advisor's Code is based on the guiding principle that the interests of the client are our top priority. Advisor's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to “access” persons. “Access” persons are employees who have access to non-public information regarding any clients’ purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

## **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Advisor and its employees do not recommend to client’s securities in which we have a material financial interest.

## **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Advisor and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Advisor with copies of their brokerage statements.

The Chief Compliance Officer of Advisor is David Hicks. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment. Since most employee trades are in products such as mutual funds, government securities, bonds or are small in size, they do not impact the securities markets.

## **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Advisor does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities

transactions as well as provide Advisor with copies of their brokerage statements.

The Chief Compliance Officer of Advisor is David Hicks. He reviews employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment. Since most employee trades are in products such as mutual funds, government securities, bonds or are small in size, they do not impact the securities markets.



# Brokerage Practices

## Factors Used to Select Broker-Dealers for Client Transactions

Advisor may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. Advisor will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Advisor relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Advisor.

When recommending Altruist as a third-party advisor, we will also recommend Altruist's affiliated broker-dealer, Altruist Financial, LLC, as the executing broker-dealer for transactions in the client's account. Altruist Financial does not charge commissions or transaction fees and allows for fully digital account opening, a large variety of security options and complete integration with software tools. Advisor does not receive any research or other soft-dollar benefit from its relationship with Altruist Financial LLC, nor we receive any referrals in exchange for using Altruist Financial LLC as a broker dealer.

- **Directed Brokerage:** In circumstances where a client directs Advisor to use a certain broker-dealer, Advisor still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: Advisor's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients and conflicts of interest arising from brokerage firm referrals.
- **Best Execution:** Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. Advisor does not exercise discretion over client accounts.

- **Soft Dollar Arrangements:** Advisor does not receive products or services other than execution (“soft dollar benefits”) from a broker-dealer or third-party for generating commissions but does receive additional economic benefits described in Item 14.

## **Aggregating Securities Transactions for Client Accounts**

If Advisor buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, Advisor would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Advisor would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with Advisor’s duty to seek best execution, except for those accounts with specific brokerage direction (if any).

# Review of Accounts

## **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed three times per year by each Investment Advisor Representative of Oakmont Advisory Group, LLC. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client.

## **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

## **Content of Client Provided Reports and Frequency**

Clients receive account statements from the custodian no less than quarterly for managed accounts. Account statements are issued by the Advisor's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

# Client Referrals and Other Compensation

## **Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest**

Advisor receives compensation from Third-Party Investment advisers to whom the Advisor directs clients.

This situation creates a conflict of interest because Advisor and/or its Investment Advisor Representative have an incentive to recommend what Third Party Investment advisers to use because of the higher fee share to be received by Advisor.

In some cases, Advisor utilizes the execution services of custodial broker dealers. Economic benefits are received by Advisor which would not be received if Advisor did not give investment advice to clients. These benefits include: a dedicated trading desk, a dedicated service group and an account services manager dedicated to Advisor's accounts, ability to conduct "block" client trades, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees directly deducted from client accounts. A conflict of interest exists when Advisor receives soft dollars. This conflict is mitigated by the fact that Advisor has a fiduciary responsibility to act in the best interest of its clients and the services received are beneficial to all clients.

However, when referring clients to a third party investment adviser, the client's best interest will be the main determining factor of Advisor.

## **Advisory Firm Payments for Client Referrals**

Advisor does not compensate for client referrals.

# Custody

## Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by Advisor.

When Advisor instructs the custodian to deduct its fee from a client's account, Adviser is deemed to have constructive custody and must have authorization from the client and client must receive a statement from the custodian at least quarterly. When Advisor uses a third-party investment adviser, the third party adviser and not the Advisor instructs the custodian to deduct the total advisory fee from the client's account.

# Investment Discretion

## Discretionary Authority for Trading

Advisor accepts discretionary authority to managed securities on behalf of clients. Advisor has the authority to determine, without obtaining specific client consent, the securities bought and sold, and the amount of securities to be bought or sold. The client may grant the Advisor discretionary authority through the advisory agreement.

The client approves the custodian to be used and the commission rates paid to the custodian. Advisor does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

# Voting Client Securities

## Proxy Votes

Advisor does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Advisor will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

# Financial Information

## Balance Sheet

A balance sheet is not required to be provided because Advisor does not serve as a custodian for client funds or securities and Advisor does not require prepayment of fees of more than \$500 per client and six months or more in advance.

## Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

In light of the COVID-19 coronavirus and historic decline in market values, Advisor has elected to participate in the CARES Act's Paycheck Protection Program ("PPP") to strengthen its balance sheet. Advisor intends to use this loan of \$7,900 predominantly to continue payroll for the firm and may ultimately seek loan forgiveness per the terms of the PPP. Due to this and other measures taken internally, Advisor has been able to operate and continue serving its clients.

## Bankruptcy Petitions during the Past Ten Years

Neither Advisor nor its management has had any bankruptcy petitions in the last ten years.



# Requirements for State Registered Advisors

Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

None to report

PART 2B OF FORM ADV

# Supervised Person Brochure

This brochure supplement provides information about Ralph Hicks and supplements the Oakmont Advisory Group, LLC brochure. You should have received a copy of that brochure. Please contact David B. Hicks if you did not receive Oakmont Advisory Group, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Ralph Hicks (CRD#1500855) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Ralph Hicks, ChFC®, CLU®**

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CRD# 1500855

## **Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure**

### **Principal Executive Officers and Management Persons**

**Ralph Hicks, ChFC®, CLU®**

Year of birth: 1942

### **Educational Background and Business Experience**

Educational Background:

- American College; Chartered Financial Consultant Designation; 1991
- American College; Chartered Life Underwriter Designation; 1977
- Bridgewater College; Business Administration; 1965

Business Experience:

- Lowkey Holdings, LLC; Owner; 02/2019 – Present
- Oakmont Advisory Group, LLC, fka Hicks Advisory Group, LLC; Managing Member/Investment Advisor Representative; 08/2011–Present
- Oakmont Insurance, LLC, fka Ralph Hicks & Associates, LLC; Owner/Insurance Agent; 07/2010–Present
- First Heartland Capital; Registered Representative; 09/2008–10/2011
- Diversified Financial; Owner/Insurance Agent; 01/2005–07/2010
- First Heartland Capital; Registered Representative; 02/2005–10/2006
- New England Securities; Registered Representative; 07/2001–01/2005

### **Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

Chartered Financial Consultant (ChFC): Chartered Financial Consultants are licensed by the American College to use the ChFC mark. ChFC certification requirements:

- Complete ChFC coursework within five years from the date of initial enrollment.
- Pass the exams for all required elective courses. You must achieve a minimum score of 70% to pass.
- Meet the experience requirements: Three years of business experience immediately preceding the date of use of the designation are required. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your ChFC designation, you must earn your recertification every two years.

Chartered Life Underwriter (CLU): Chartered Life Underwriters are licensed by the American College to use the CLU mark. CLU certification requirements:

- Complete successfully CLU coursework 5 required and 3 electives
- Meet the experience requirements: Three years of business experience immediately preceding the date of use of the designation are required. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your CLU designation, you must earn 30 hours of continuing education credit every two years.

## **Disciplinary Information**

Without admitting or denying the findings, Ralph Hicks signed a Letter of Acceptance, Waiver and Consent with FINRA on March 28, 2013. The order alleges that Mr. Hicks did not obtain prior approval on advertising by a registered principal of his employing firm before distribution to clients.

## **Other Business Activities**

Managing Member Ralph Hicks has a financial industry affiliated business as an insurance agent. Less than 50% of his time is spent in this business. From time to time, he will offer clients advice or products from those activities. As an insurance agent, he may receive separate yet typical compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives Ralph Hicks an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Hicks has a fiduciary responsibility to place the interest of his clients first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Ralph Hicks is also an owner of Lowkey Holdings, LLC, a real estate holdings company. He spends 1 hour a month outside of trading hours on this activity.

## **Additional Compensation**

As a result of the Advisor's activities, the Advisor will be, in certain situations, but eligible for additional incentive-based compensation based on sales. This compensation can be delivered in many forms including but not limited to training, trip expenses, or payment of software costs.

## **Supervision**

Ralph W. Hicks is the, is the 50% owner. As a representative of Oakmont Advisory Group, LLC, Ralph W. Hicks works closely with the supervisor, David Hicks, and all advice provided to clients is reviewed by the supervisor prior to implementation. Ralph W. Hicks adheres to applicable regulations regarding the activities of an Investment Adviser Representative, together with all policies and procedures outlined in the firm's code of ethics and compliance manual. David Hicks's phone number is 505-821-6966.

## **Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: Without admitting or denying the findings, Ralph Hicks signed a Letter of Acceptance, Waiver and Consent with FINRA on March 28, 2013. The order alleges that Mr. Hicks did not obtain prior approval on advertising by a registered principal of his employing firm before distribution to clients.

Bankruptcy Petition: None

PART 2B OF FORM ADV

# Supervised Person Brochure

This brochure supplement provides information about David B. Hicks and supplements the Oakmont Advisory Group, LLC brochure. You should have received a copy of that brochure. Please contact David B. Hicks if you did not receive Oakmont Advisory Group, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about David B. Hicks (CRD#6156912) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## David B. Hicks

2001 Carlisle Blvd NE, Suite D

Albuquerque, NM 87110

PHONE: 505-821-6966

FAX: 505-312-7533

EMAIL: [david@oakmontadvisory.com](mailto:david@oakmontadvisory.com)

<https://oakmontadvisory.com>

CRD# 6156912

## **Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure**

### **Principal Executive Officers and Management Persons** **David B. Hicks**

Year of birth: 1979

### **Educational Background and Business Experience**

Educational Background:

- Abilene Christian University, BBA Degree in Marketing and Management; 2002

Business Experience:

- Lowkey Holdings, LLC; Owner; 02/2019 – Present
- Oakmont Advisory Group, LLC, fka Hicks Advisory Group, LLC; Managing Member/Investment Advisor Representative/Chief Compliance Officer; 01/2013–Present
- Oakmont Insurance, LLC, fka Ralph Hicks & Associates, LLC; Managing Member/Marketing/Insurance Broker/Agent; 08/2009–Present
- Interpublic Group, Inc.; Marketing Manager; 02/2007–08/2009
- Sienna Plantation Golf Club; Marketing Director; 09/2005–02/2007
- Golf Solutions; Marketing Manager; 05/2003–09/2005

### **Disciplinary Information**

None to report



## Other Business Activities

David B. Hicks has financial industry affiliated businesses as an insurance agent. Mr. Hicks spends less than 50% of his time in this capacity and from time to time, he offers clients advice or products from those activities. Clients are not required to purchase any products. He may receive separate, yet typical, compensation in the form of commissions for the sale of insurance products.

These practices represent conflicts of interest because it gives Mr. Hicks an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

David B. Hicks is also an owner of Lowkey Holdings, LLC, a real estate holding company. He spends approximately 12 hours a month on this business activity, the majority of those are outside of trading hours.

David B. Hicks is on the Board of Directors for Oak Grove Classical Academy, a private Christian school.

## Additional Compensation

As a result of the Advisor's activities, the Advisor will be, in certain situations, but eligible for additional incentive-based compensation based on sales. This compensation can be delivered in many forms including but not limited to training, trip expenses, or payment of software costs.

## Supervision

As the Chief Compliance Officer of Oakmont Advisory Group, LLC, David B. Hicks supervises all duties and activities of the firm. David B. Hicks's contact information is on the cover page of this disclosure document. David B. Hicks adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

David B. Hicks' contact information:

Phone: 505-821-6966, or by email at: [david@oakmontadvisory.com](mailto:david@oakmontadvisory.com)

## **Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

# Supervised Person Brochure

This brochure supplement provides information about Brandon Connor Kinsner and supplements the Oakmont Advisory Group, LLC brochure. You should have received a copy of that brochure. Please contact Brandon Connor Kinsner if you did not receive Oakmont Advisory Group, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Brandon Connor Kinsner (CRD#7621973) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Brandon Connor Kinsner**

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<https://oakmontadvisory.com>

CRD# 7621973

# **Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure**

## **Brandon Connor Kinsner**

Year of birth: 1996

## **Educational Background and Business Experience**

Educational Background:

- Associates Degree Psychology, Central New Mexico Community College - 2022

Business Experience:

- Oakmont Advisory Group, LLC; Investment Advisor Representative/Advisor; 01/2021–Present
- OPS BTFO; Operations Manager; 12/2018–01/2021
- UbreakIfix; Technician Manager; 10/2017–12/2018
- Miracle Fulfillment; Warehouse Manager; 08/2014–10/2017
- Flee Market Electronic Sales; Salesman; 09/2013–08/2014
- Hollister Clothing Co.; Floor Model; 08/2012 – 09/2013

## **Disciplinary Information**

None to report

## **Other Business Activities**

Brandon Connor Kinsner is not engaged in any investment-related business or occupation (other than this advisory firm).

## **Additional Compensation**

As a result of the Advisor’s activities, the Advisor will be, in certain situations, but eligible for additional incentive-based compensation based on sales. This compensation can be delivered in many forms including but not limited to training, trip expenses, or payment of software costs.

## **Supervision**

As a representative of Oakmont Advisory Group, LLC, Brandon Connor Kinsner is supervised by David B Hicks, the firm's Chief Compliance Officer. David B Hicks is responsible for ensuring that Brandon Connor Kinsner adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for David B Hicks is (505) 821-6966.

## **Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None