Item 1 – Cover Page

Brochure

Oceanis Financial Advisors, Inc.

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March 16, 2026

This Brochure provides information about the qualifications and business practices of Oceanis Financial Advisors, Inc. ("OFA," "Firm," "us," "we," or "our"). When we use the words "you," "your," and "client," we refer to you as our client or our prospective client. We use the term "associated person" when referring to our officers, employees, and all individuals providing investment advice on behalf of OFA. If you have any questions about the contents of this Brochure, please contact us at 336-655-1400 or alotero@oceanisfa.com . The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

OFA is a registered investment adviser. The registration of an investment adviser does not imply any level of skill or training. The oral and written communications made to you by OFA, including the information contained in this Brochure, should provide you with information to determine whether to hire or retain OFA as your adviser.

Additional information about OFA is also available on the SEC's website at www.adviserinfo.sec.gov ("IAPD"). The SEC's website also provides information about any persons affiliated with or registered with, and or required to be registered, as investment adviser representatives of OFA.

Item 2 - Material Changes

Please note that there were no "material changes" made to this Brochure since our last delivery or posting of the Brochure on the SEC's public disclosure website ("IAPD) www.adviserinfo.sec.gov; however, there have been some minor edits to this Brochure, along with an update to our assets under management.

Currently, our Brochure may be requested, free of charge, by contacting Alberto Otero, President at (336) 655-1400, or our Brochure is also available online at the following internet address: www.adviserinfo.sec.gov.

Item 3 -Table of Contents

Item 4 – Advisory Business

OFA is located in Miami, Florida, and was founded in 2014 by Alberto Otero. The principal owner of OFA is Alberto Otero.

Services Offered

OFA provides discretionary investment advisory and consulting services. Investment advice and portfolio management services are provided on an ongoing basis, including the appropriate allocation of managed assets across cash, stocks, mutual funds, and bonds. This selection of specific securities will provide proper diversification and help meet the client's stated investment objectives, although you may impose restrictions on us regarding investments in certain securities, types, or classes of securities. These portfolio management services include the following:

- Portfolio management services for individuals and/or small businesses
- Portfolio management for businesses or institutional clients (other than investment companies)
- Financial planning services

Investment Products

OFA may offer advice on the following as well as the foreign equivalents of the following investment products:

- Equity securities.
- Exchange-listed securities.
- Over-the-counter securities.
- Securities of foreign issuers (including ADRs, EDRs and GDRs).
- Warrants.
- Rights.
- Restricted shares.
- Options contracts.
- Futures.
- Corporate debt.
- Commercial paper.
- Certificates of deposit.
- United States government securities.
- Municipal securities.
- Investment company securities including variable life insurance products.
- Variable annuities and mutual funds.
- Interests in partnerships investing in real estate, oil and gas interests.
- Swaps.
- Forward contracts.
- Options on futures contracts.
- Interest and principal only strips.

- Structured notes.
- Listed and over the counter derivatives.
- Mortgage related and other asset backed securities.
- Bank loans.
- Collateralized debt obligations.
- Collateralized mortgage obligations.
- Foreign currency forward agreements.
- Repurchase and reverse repurchase agreements.
- Private placements.

Retirement Accounts – DOL Disclosure

We are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act of 1974 ("ERISA") and/or the Internal Revenue Code ("Code"), as applicable, when we provide investment advice regarding portfolio assets held in an IRA, Roth IRA, Archer Medical Savings Account, a Plan covered by ERISA, or a plan described in Section 4975(e)(1)(A) of the Code (collectively referred to collectively sometimes herein as ("Retirement Accounts").

To ensure that OFA adheres to fiduciary norms and basic standards of fair dealing with respect to Retirement Accounts, we are required to give advice that is in the "best interest" of the retirement client. The best interest standard has two chief components: prudence and loyalty. Under the prudence standard, our advice must meet a professional standard of care, and under the loyalty standard, our advice must be based on the interests of our retirement clients rather than the potentially competing financial interests of OFA.

To address the conflicts of interest with respect to our compensation, we are required to act in your best interest and not put our interests ahead of you. To this end, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice).
- Never put our financial interests ahead of yours when making recommendations (give loyal advice).
- Avoid misleading statements about conflicts of interest, fees, and investments.
- Follow policies and procedures designed to ensure that we give advice that is in your best interest.
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Assets Under Management

As of December 31, 2025, the Firm had $225,577,994 in discretionary assets under management.

Wrap Fees

OFA does not offer or manage a wrap fee program.

Education

All OFA personnel are expected to have educational and business backgrounds that enable them to perform their respective responsibilities effectively. In assigning responsibilities, we consider academic background (including college and graduate school studies and degrees earned), industry training, licenses, and certifications. Work experience in a related field, such as investments, commodities, insurance, banking, or accounting, is also considered. No formal, specific standards have been set, but appropriate education and experience are required. See *ADV Form Part 2B* for additional information.

Item 5 – Fees and Compensation

Type of Compensation

OFA is compensated for the investment services provided based upon a percentage of the portfolio assets under management. The fee schedule is set out below:

<u>*Fee schedule:*</u>

Assets	Rate
Up to $1M	2.00%
$1M – $2.5M	1.75%
$2.5 - $5M	1.50%
$5M – $25M	1.25%
Over $25M	1.00%

OFA does not charge separately for financial planning services; this is included in the annual fee. All fees are subject to negotiation. The amounts and specific manner in which fees are charged are negotiated and memorialized in OFA's contracts with our clients, and we generally bill our fees on a quarterly basis, in advance.

Clients generally authorize us to directly debit fees from their accounts. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Generally, investment advisory contracts may be terminated by clients at any time.

Transaction Costs

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third-party investment, and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. See also *Brokerage Practices and Referral Arrangements and Other Compensation* for a description of additional compensation received by OFA and for a description of factors that OFA considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Termination

The relationship between parties may be terminated by either party upon 30 days' written notice. Notwithstanding the above, if the appropriate disclosure statement was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory agreement with this investment adviser, then the client has the right to terminate the relationship, without penalty, within five (5) business days after entering into the agreement. If the relationship is terminated in the middle of a quarter and client has prepaid the quarterly fee, OFA will reimburse client a percentage of the prepaid fee that equals that part of the quarter that remains after the 30-day notice is satisfied, on a pro rata basis.

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

OFA 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). Additionally, OFA does not engage in side-by-side management.

Item 7 – Types of Clients

Client Profile

We offer portfolio management investment advice to the following types of clients:

- Individuals
- Families
- High net worth individuals
- High net worth families
- Corporations
- Trusts

Account Requirements

OFA generally requires Client's managed assets to consist initially of cash and securities with a minimum asset value of no less than $50,000, unless OFA in its sole discretion, agrees to accept a Client's managed assets with a lesser value.

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

Analysis Methods

Security analysis methods utilized by OFA include the following:

Charting

Charting analysis seeks to identify resistance and support levels to inform decisions to buy (when the price hits support) or sell (when the price hits resistance). Through charting, the analysis seeks to identify price patterns and market trends. Charting may be used for long-term investing or as a market-timing strategy, depending on the timeframe of the price charts.

Fundamental

Fundamental analysis holds that markets may misprice a security in the short run, but the "correct" price will eventually be reached. Fundamental analysis of a business involves examining a business's financial statements and health, management and competitive advantages, and competitors and markets. When applied to futures and forex, it focuses on the overall state of the economy, interest rates, production, earnings, and management.

Technical

Technical analysis maintains that all information is already reflected in the stock price. Technical analysis is a discipline for forecasting price direction by studying past market data, primarily price and volume. Generally, technical analysis employs models and trading rules based on price and volume transformations, such as the relative strength index, moving averages, regressions, inter-market and intra-market price correlations, business cycles, stock market cycles or, classically, recognition of chart patterns.

Cyclical

Cyclical analysis generally targets cyclical stocks for purchase of equity securities when the ratio of price-to-earnings ("P/E Ratio") is low and sell them when the P/E Ratio is high (i.e., when earnings are peaking). The P/E Ratio is a measure of the price paid per share relative to the firm's annual net income per share.

Sources of Information

The main sources of information that OFA uses to analyze these investment strategies are:

- Financial newspapers and magazines
- Inspections of corporate activities.
- Research materials prepared by others.
- Company press releases.

Investment Strategies

The investment strategies OFA uses to implement any investment advice given to clients includes the following:

- Long term Purchases (securities held at least a year).
- Short-term purchases (securities sold within a year).
- Trading (securities sold within 30 days).
- Option writing, including covered options, uncovered options or spreading strategies.

Investment Strategy Risks

Investing in securities involves risk of loss that clients should be prepared to bear. All investment programs have certain risks that are borne by the investor. Our investment approach seeks to keep the risk of loss in mind. Investors face the following investment risks:

General Risks

Lack of Diversification: Portfolio investments may be concentrated, limiting diversification. There are no limits on position sizes. Any assets or combinations of assets that can be held in a securities account can be purchased or sold.

Cash and Cash Equivalents: Accounts may maintain significant cash positions from time to time, and the client will pay the Investment Management Fee based on the Account's net asset value, including cash and cash equivalents. Furthermore, the Account may forego investment opportunities to hold cash positions if we consider it in the best interests of the Account.

Interest Rate Fluctuation: The prices of securities in which the Advisor may invest are sensitive to interest rate fluctuations, and unexpected fluctuations in interest rates could cause the corresponding prices of the long and short portions of a position to move in directions that were not initially anticipated. In addition, interest rate increases generally will increase the interest carrying costs of borrowed securities and leveraged investments.

Long-term Purchases (securities held at least a year)

Liquidity: The portfolio may be invested in liquid and illiquid securities. You should be aware that liquid securities may become less liquid during the holding period.

Short-term purchases (securities sold within a year)

Market Risks: The success of a significant portion of the program will depend, to a great extent, on correctly assessing the future course of price movements in the securities traded. There can be no assurance that the trading program will accurately predict these price movements. Additionally, the effectiveness of the trading program may decline over time as other market participants develop similar programs or techniques.

Trading (securities sold within 30 days)

Market Risks: The success of a significant portion of a trading program will depend, to a great extent, on correctly assessing the future course of price movements in the securities traded. There can be no assurance that the trading program will accurately predict these price movements. Additionally, over time, the trading program's effectiveness may decline for various reasons, including other market participants developing similar programs or techniques.

Trading is Speculative: There are risks involved in trading securities. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary, and exchange control programs and policies; changing supply-and-demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and through regulation, in certain markets, often with the intent to influence prices. The effects of governmental intervention may be particularly significant at certain times in the financial instrument markets, and such intervention, as well as other factors, may cause these markets to move rapidly.

Turnover: Our trading activities may be based on short-term market considerations. The portfolio turnover rate could be significant, potentially involving substantial brokerage commissions, and related transactional fees and expenses.

Margin Risk

Leverage: We may use leverage in investing. Such leverage may be obtained through various means. The use of short-term margin borrowings may result in certain additional risks to Accounts. For example, should the securities pledged to a broker to secure a margin account decline in value, a "margin call" may be issued pursuant to which additional funds would be required to be deposited with the broker, or the broker would effect a mandatory liquidation of the pledged securities to compensate for the decline in value. We might not be able to liquidate assets quickly enough to pay off the margin debt, and the Accounts may therefore also suffer additional significant losses because of such a default. Although borrowing money increases returns when returns on the incremental investments purchased with the borrowed funds exceed the borrowing costs, the use of leverage decreases returns when returns on such incremental investments are lower than the borrowing costs.

Option writing, including covered & uncovered options or spreading strategies

Options and Other Derivatives: We may purchase or sell options, warrants, equity-related swaps, or other derivatives that trade on an exchange. Both the purchasing and selling of call and put options entail risks. An investment in an option may be subject to greater fluctuation than an investment in the underlying securities. The effectiveness of purchasing or selling stock index options as a hedging technique depends on the extent to which price movements in the portion of the Accounts that is hedged correlate with price movements in the selected stock index. Because the value of an index option depends upon movements in the level of the index rather than the price of a particular security, whether an Account realizes a gain or loss will depend upon movements in the level of security prices in securities markets generally rather than movements in the price of a particular security.

Uncovered Risks: We may employ various "risk-reduction" techniques designed to minimize the risk of loss in Accounts. Nonetheless, substantial risk remains that such techniques will not always be possible to implement, and when possible, will not always be effective in limiting losses. Hedging against a decline in the value of a portfolio position does not eliminate fluctuations in the values of portfolio positions or prevent losses if the value of such a position declines, but utilizes other positions designed to gain from those same developments, thus moderating the decline in the portfolio positions' value. Such hedge transactions also limit the opportunity to realize gains if the value of a portfolio position should increase. Moreover, it may not be possible for us to hedge against a fluctuation that is so generally anticipated that we are not able to enter into a hedging transaction at a price sufficient to protect from the decline in value of the portfolio position anticipated because of such a fluctuation. The success of the hedging transactions will depend on the ability to accurately predict market fluctuations. Therefore, while we may enter into such transactions to reduce risk, unanticipated market movements and fluctuations may result in poorer overall performance for the Accounts Portfolio than if we had not engaged in any such hedging transactions. Finally, the degree of correlation between the price movements of the instruments used in a hedging strategy and those of the portfolio position being hedged may vary.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of OFA or the integrity of OFA's management. OFA has no information that is applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Neither OFA nor its supervised persons are engaged in any outside business activities.

Item 11 – Code of Ethics, Participation, or Interest in Client Trading

General

OFA has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor-mongering, restrictions on the acceptance of significant gifts and on the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at OFA must acknowledge the terms of the Code of Ethics annually, or upon any amendments.

The Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of the employees of OFA 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. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between OFA and its clients. OFA will also maintain quarterly reports on all personal securities transactions, except transactions in investment company securities and/or other exempt transactions.

Personal Trading

OFA and our related persons may purchase and sell securities for their own account. To prevent conflicts of interest, all OFA employees must comply with our Code of Ethics, which restricts the purchase or sale of securities for their own accounts and for the accounts of certain affiliated persons. Additionally:

- No security may be bought or sold by a principal or employee of OFA before OFA's clients' accounts have had the opportunity to make such transactions as appropriate.
- All OFA principal and employee trades will be reviewed by the compliance officer, and
- Principals and employees of OFA will not receive a more favorable execution price on a particular day than those received by our investment advisory clients.

OFA's clients or prospective clients may request a copy of the Firm's Code of Ethics, free of charge, by contacting the person listed in this brochure.

Cross Trades

It is OFA's policy that we will not affect any principal or agency cross-securities transactions for client accounts. We will also not cross trades between client accounts. Principal transactions are generally defined as transactions in which an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Insider Information

Further, the Code of Ethics and Supervisory Procedures imposes policies and procedures regarding the misuse of material non-public information, designed to prevent insider trading by any officer, partner, or associated person of OFA.

Item 12 – Brokerage Practices

General

Unless Client instructs OFA otherwise, the firm may place orders for the execution of transactions with or through a broker/dealer as OFA may select, and complying with Section 28(e) of the Securities Exchange Act of 1934, may pay a commission on transactions in excess of the amount of commission another broker or dealer would have charged. OFA will select brokers that can effect transactions at the best price and with the best execution under the prevailing circumstances. In managing investment portfolios, OFA acts in a manner consistent with what it understands and believes to be in the best interests of the client. Individual securities are selected to provide diversification among economic sectors and industries, which are chosen to achieve the desired balance between expected risk and expected return. Transactions of an unusual nature are discussed with clients before execution.

OFA will allocate brokerage transactions in a manner that it believes is fair and responsible to its clients and consistent with client objectives. Adhering to a strict formula will not be practicable given the variation in client objectives and guidelines.

Best Execution

Transaction rates for trades executed through OFA may not always be as favorable as those that could be obtained through another broker-dealer. The fact that OFA's clients are likely to use an affiliated broker to execute transactions presents a potential conflict of interest in that OFA s personnel will receive additional compensation in their capacity as Broker. Such transactions may create a conflict of interest because OFA has a duty to obtain the most favorable price for advisory clients while its registered representatives of the affiliated broker-dealer have a duty to obtain the most favorable price for their brokerage customers. Accordingly, in engaging in cross transactions, OFA will follow procedures designed to ensure that all parties to the transaction receive at least as favorable a price as they would receive if the transaction were executed on the open market.

Directed Brokerage

OFA may place all or a portion of the transactions with a broker with whom the client has a special advisory or consulting relationship. Such transactions are placed with a broker who may have provided manager selection services, performance measurement services, asset allocation services, or a variety of other consulting or monitoring assistance, all with the client's specific knowledge and full approval.

OFA does not maintain agreements with referring brokers regarding our internal allocation of brokerage transactions. However, all or a sizable portion of a particular clients' brokerage transaction business may be directed to a particular broker if the client has directed, agreed, or stipulated us to do so. Commissions are not intended to compensate brokers for client referrals.

With regard to client-directed brokerage, we are required to disclose that they may be unable to negotiate commissions, block or batch client orders, or otherwise achieve the benefits described above, including best execution, if you limit our brokerage discretion. Directed brokerage commission rates may be higher than the rates OFA might pay for transactions in non-directed accounts.

Also, clients that restrict our brokerage discretion may be disadvantaged in obtaining allocations of new issues of securities that we purchase or recommend for purchase in other clients' accounts. It is our policy that such accounts do not participate in allocations of new issues of securities obtained through brokers and dealers other than those designated by the client. As a general rule, we encourage each client to compare the potential costs or disadvantages of directed brokerage with the value of the custodial or other services the broker provides in exchange for the directed broker designation.

Trade Aggregation

When OFA trades the same security in more than one client account, we generally attempt to batch or "bunch" the trades in order to create a "block transaction." Generally, buying and selling in blocks helps create trading efficiencies, prompt attention, and desired price execution. We will place all or substantially all transactions to purchase or sell common stocks with the client's "directed" broker, when applicable. (See the section titled, "*Directed Brokerage*") Whenever possible, we will attempt to batch or aggregate trades for clients who use the same directed brokers to create a "block transaction." The commission amount and per share commission rate will differ between our clients with directed brokerage relationships due to the dollar value and the size (number of shares) of the trade for each account, and the total relationship between the client and their broker. Because each client may differ in portfolio size, investment objective, equity exposure, and the extent of the relationship with their broker, we do not negotiate commission discounts on the block transaction itself.

Loan Advance Accounts

Your portfolio assets may be "pledged" or used as collateral, with our approval, in connection with loans obtained through JP Morgan (referred to as "Lending Program"). Under these Lending Programs, you may receive loan proceeds through an arrangement whereby your account is pledged to JP Morgan (the "lender"). If you have elected to participate in a Lending Program, the terms and conditions applicable to that Lending Program are governed by the applicable loan documents and other service agreements and are not included or described further in this Brochure. You should carefully review the terms, conditions, and any related risk disclosures for such Lending Program and understand that these risks may be increased if you hold a concentrated position in your pledged account or if your pledged account represents all, or nearly all, of your total net worth or investable assets. A collateral call could disrupt our investment strategy for the account. You should consult your own independent tax advisor to fully understand the tax implications of pledging your Account as loan collateral and the potential liquidation of pledged assets. You are encouraged to speak with your Financial Advisor to the extent you have questions about how your account may be used in connection with a Lending Program and how such an arrangement should be taken into consideration when discussing the management of your account.

If a client decides to enter into the Lending Program with JP Morgan, the following should be carefully considered:

- The client is borrowing money that will have to be repaid to JP Morgan.
- Pledge arrangements are only available for non-qualified accounts.
- Unlike a margin account, non-purpose loans cannot be used to purchase additional securities.
- The client, as the borrower, is using cash and securities that the client owns in the account as collateral.
- The client will be charged an interest rate that is subject to change.
- JP Morgan is responsible for reviewing the loan documentation and any other documents JP Morgan may require for the client to obtain the loan. JP Morgan, in its sole discretion, will determine the applicant's creditworthiness, including the loan amount.

Prior to establishing a loan with JP Morgan, you should carefully review the loan agreement, loan application, and any other form required by JP Morgan to process the loan.

Soft Dollar Arrangements

Soft dollar arrangements are a common practice in the Investment Advisory industry. The U.S. Congress created a "safe harbor" under Section 28(e) of the Securities and Exchange Act of 1934, which establishes strict standards by which soft dollar arrangements are allowed. Under this safe harbor, an advisor can consider the provision of research and execution services when evaluating the cost of brokerage services without violating its fiduciary responsibilities. JP Morgan Securities, StoneX, and UBS Financial Services, Inc., referred to collectively as "Custodian," follow the safe harbor available under Section 28(e) in arranging and executing its soft dollar arrangements.

Custodian makes available to OFA products and services that benefit OFA but may not directly benefit its clients' accounts. Some of these products and services assist OFA in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of OFA's fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting.

Additionally, the Custodian makes other services available to OFA to help it manage and further develop its business enterprise. These services may include consulting, publications, and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

In addition, Custodian may make available, arrange, and/or pay for these types of services noted above, or pay all or a part of the fees of a third party providing these services to OFA. To this end, the Custodian is paying for the portfolio management software utilized by OFA. These services benefit all clients of OFA.

While as a fiduciary, OFA endeavors to act in its clients' best interests, while we recommend that clients maintain their assets in accounts at Custodian, that recommendation is based in part on the benefit to OFA of the availability of some of the foregoing products and services, and not solely on the nature, cost or quality of custody and brokerage services provided by Custodian, which creates a potential conflict of interest. OFA mitigates that conflict of interest through disclosures made in this Brochure, client agreements, and in reports and conversations with clients.

Item 13 – Review of Accounts

Account Review

Michele Paradiso, Chief Compliance Officer will review all accounts on a quarterly basis and compare each investment on a transaction basis to ensure that each transaction is: (i) suitable to the respective client's investment objectives; (ii) meets that client's quality standards; and (iii) to make sure that their investment objectives are still pertinent to the managed account arrangement. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances or the market economic or political environment.

Reports

The clients receive brokerage transaction confirmations and monthly statements from the custodian of the account.

Trade Errors

In the event of a trade error in your account, our policy is to attempt to correct trading errors as soon as they are discovered; however, we may not be responsible for poor executions or trading errors committed by the brokers with which it transacts, unless such errors resulted from OFA's negligence, fraud, or willful misconduct. Notwithstanding the above, based on the circumstances, corrective actions may include:

- canceling the trade
- adjusting an allocation and/or
- reimbursement to the account

Item 14 – Client Referrals and Other Compensation

Client Referrals

OFA does not utilize or pay third party solicitors for the referral of advisory clients to us.

Other Compensation

OFA and its associated persons do not receive compensation from other people related to its advisory services or advisory clients.

Item 15 – Custody

Custody Rule

The Custody Rule provides that it is a fraudulent, deceptive or manipulative act, practice or course of business within the meaning of Section 206(4) of the Advisers Act for an investment adviser that is registered or required to be registered under the Advisers Act to have custody of client funds or securities unless they are maintained in accordance with the requirements of the rule. In this regard, where an investment adviser has custody of client funds or securities, it must obtain a surprise examination of client assets by an independent public accountant.

Invoicing

OFA is deemed to have custody of the funds and securities because of our authority to make withdrawals from client accounts to pay its advisory fee. However, a surprise examination is not required because OFA has written authorization from each client to deduct advisory fees from the account held with the Custodian, and each time a fee is directly deducted from a client account, we send the Custodian an invoice or statement of the amount of the fee to be deducted from the client's account.

Standing Letters of Authority ("SLOA")

OFA has been deemed to have inadvertent custody because of your providing us with SLOAs to withdraw funds from your portfolio account to pay third parties. Notwithstanding that, a surprise examination is not required as we are relying on the conditions set forth in the No-Action letter issued by the SEC on February 21, 2017. Pursuant to the conditions set forth in the No-Action Letter, OFA confirms that (1) you provide an instruction to the Custodian, in writing, that includes your signature, the third party's name, and either the third party's address or the third party's account number at the Custodian to which the transfer should be directed; (2) you authorize us, in writing, either on the Custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time; (3) The Custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the your authorization, and the Custodian provides a transfer of funds notice to you promptly after each transfer; (4) you have the ability to terminate or change the instruction to the Custodian; (5) we have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third- party contained in the your instruction; (6) we maintain records showing that the third party is not a related party of OFA or located at the same address as OFA; and (7) the Custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16 – Investment Discretion

Discretionary Authority

We receive discretionary authority from you at the outset of an advisory relationship. That discretionary authority allows us to make determinations regarding the securities that are to be bought and sold, as well as the quantities of such securities.

Documentation of Discretion

Discretionary authority is provided in our contract with each client. Additionally, we maintain a Limited Power of Attorney for all our discretionary accounts to direct and/or effect investments, and to make direct payments of fees and/or commissions, custodial fees, and/or other charges incurred by the managed account.

Discretionary Management

In all cases, however, our discretion is to be exercised in a manner consistent with the stated investment objectives for the particular account. Thus, when selecting securities and determining amounts, we observe the investment policies, limitations, and restrictions of the clients for which it advises. Additionally, in many cases, the discretion is subject to mutually agreed upon investment guidelines relative to the client's portfolio. Investment guidelines and restrictions must be provided to OFA in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, OFA does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain responsibility for receiving and voting proxies for all securities held in client portfolios.

Item 18 – Financial Information

We are required to provide you with certain financial information or disclosures about our financial condition, which would impede our ability to provide the advisory services described herein. OFA has no financial commitments that impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding. OFA does not require or solicit prepayment of more than $500 in fees per client and six months or more in advance, therefore OFA has no material additional financial disclosures to make.

Item 19 – Requirements for State-Registered Advisers

Item 19 is not applicable to Federally registered investment advisers.

Item 20 – Other Information

Privacy Notice to Customers

At OFA, we do not disclose nonpublic personal information about our individual clients or former clients except as permitted by law. We restrict access to nonpublic personal information about you (that we may obtain from your account and your transactions) to those employees who need to know that information to provide products or services to you or to alert you to new, enhanced, or improved products or services we provide. We maintain physical, electronic, and procedural safeguards that comply with federal standards to safeguard your nonpublic personal information.

Business Continuity Plan

OFA has developed a Business Continuity Plan to address how we will respond to events that may disrupt our business. Since the timing and impact of disasters are unpredictable, we will have to be flexible in our response as events unfolds. This plan is designed to permit us to resume operations as quickly as possible, given the scope and severity of the significant business disruption. The Business Continuity Plan covers data backup and recovery, mission-critical systems financial and operational assessments, alternative communications, alternate business locations, bank and counter-party impact, regulatory reporting, and the assurance of prompt access to funds and securities for our customers.

Varying Disruptions – Significant business disruptions can vary in their scope, such as emergencies affecting only a single building housing OFA, the business district where we are located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only us or a building housing us, we will transfer our operations to an emergency-ready local site, moving a select group of trained employees and expecting to recover and resume business within four hours. In a disruption affecting our business district, city, or region, we will move appropriate staff to a site outside of the affected area to be able to communicate with Custodian on behalf of our clients. In either situation, we plan to continue in business, transferring operations to our clearing firm, if necessary.

If you have questions about our Business Continuity Plan, please feel free to contact us.