



FORM ADV

PART 2A

Current as of December 31, 2019

Opus Financial Advisors, Inc.

Main Office:

126 E. Water Street ~ Statesville, NC 28677

Branch Office:

4421 Manns Chapel Road ~ Chapel Hill, NC 27516

704-872-7671

www.opusfa.com

This brochure provides information about the qualifications and business practices of Opus Financial Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at (704) 872-7671. 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 Opus Financial Advisors, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

This item discusses only specific material changes that are made to this Brochure and provides clients with a summary of such changes. The last amendment of the Opus Financial Advisors, Inc. Form ADV, Part 2A, was December 2018.

The only material changes since our last amendment, December, 2018, were as follows:

Item 4 – Advisory Business: This section was amended to show that the *VISION2020 Wealth Management Platform – Genesis Model Portfolios Program* will not be offered to new clients after December 30, 2019.

Item 4 – Advisory Business: The name of the *VISION2020 Wealth Management Platform – SMA and UMA Program* has been changed to *VISION2020 Wealth Management Platform – Unified Managed Account Program*.

Item 7 – Types of Clients: The minimum account size for the *VISION2020 Wealth Management Platform – Unified Managed Account Program* was changed to \$5,500.

Item 19 – Summary of officer title changes are as follows:

- James T. Staples, formerly CEO & President
 - o Currently Chairman & Chief Investment Officer
- Nina S. Lloyd, formerly Vice President
 - o Currently President & Chief Executive Officer
- Janna M. Deegan, formerly Investment Advisor Representative
 - o Currently Vice President & Chief Compliance Officer
- Nicole J. Robertson, formerly Vice President
 - o Currently Senior Vice President
- Martin A. Frost, formerly Vice President
 - o Currently Vice President & Senior Investment Analyst

Will I receive a brochure every year?

We may, at any time, update this brochure. Any material changes will either be sent to you as a summary of those changes or, depending on the extent of these changes, you will receive the entire updated brochure.

May I request additional copies of the brochure?

Absolutely. You may request and receive additional copies of this brochure in one of three ways;

1. Contact your Advisor with whom you are working with.
2. Download the brochure from the SEC website at: <https://www.adviserinfo.sec.gov>. Select “investment adviser firm” and type in our Firm name.
3. Contact our main office at 704-872-7671 or email a request to: info@opusfa.com.

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Item 4 – Advisory Business

Opus Financial Advisors, Inc. (OPUS) has been an independent investment advisor and financial planning firm for over three decades. We have built a strong reputation within the community through our commitment to technology and service.

OPUS is registered with the North Carolina Department of the Secretary of State Securities Division as an investment advisor in the State of North Carolina, in order to offer investment advisory services and products to our advisory clients. Such services are offered through certain Adviser Representatives (“Advisory Representative”). Registration does not imply a certain level of skill or training.

We have been a state registered Investment Adviser since 2001 with approximately \$31,000,000 assets under management on a discretionary basis and, as of 12/31/2019, a total of approximately \$188,000,000 of assets under advisement. Investment Representatives may use Third-Party Money Managers in their capacity as Registered Representatives of their Broker-Dealer.

OPUS is owned by James T. Staples.

Each of our Advisory Representatives may offer all or any combination of the advisory programs described below to our clients (“you”).

VISION2020 WEALTH MANAGEMENT PLATFORM – ADVISOR MANAGED PORTFOLIOS

The Wealth Management Platform – Advisor Managed Portfolios Program (“Advisor Managed Portfolios”) provides comprehensive investment management of your assets through the application of asset allocation planning software as well as the provision of execution, clearing and custodial services through Pershing, LLC (“Pershing”).

Advisor Managed Portfolios provides risk tolerance assessment, efficient frontier plotting, fund profiling and performance data, and portfolio optimization and re-balancing tools. Utilizing these tools, and based on your responses to a risk tolerance questionnaire (“Questionnaire”) and discussions that we have together regarding, among other things, investment objective, risk tolerance, investment time horizon, account restrictions, and overall financial situation, we construct a portfolio of investments for you. This portfolio may consist of mutual funds, exchange traded funds, equities, options, debt securities, variable life, variable annuity sub-accounts (certain restrictions may apply) and other investments.

Each portfolio is designed to meet your individual needs, stated goals and objectives. Additionally, you have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

For further Advisor Managed Portfolio details, please see the Advisor Managed Portfolios Wrap Fee Program Brochure. We provide this brochure to you prior to or concurrent with your enrollment in Advisor Managed Portfolios. Please read it thoroughly before investing.

VISION2020 WEALTH MANAGEMENT PLATFORM – GENESIS MODEL PORTFOLIOS PROGRAM

The Wealth Management Platform – Genesis Model Portfolios Program (“Model Program”) offers Clients managed asset allocation models (“Asset Allocation Models”) of mutual funds, exchange traded funds (“ETFs”) or a combination there of, diversified across various investment styles and strategies. The Asset Allocation Models are constructed by managers (“Program Managers”) such as BlackRock Investment Management, LLC and Vanguard Advisers, Inc. The Model Program is a Wrap Account program that offers these advisory services along with brokerage and custodial services for a single, annual, asset-based advisory fee.

Based upon the risk tolerance of each Client, the Model Program utilizes a system that selects a specific Asset Allocation Model. After the Asset Allocation Model is chosen, we, with the assistance of the Model Program sponsor, will open a Model Program account. Your assets will be invested in the specific investments contained within the recommended Asset Allocation Model. You have the opportunity to place reasonable restrictions on investments held within the Model Program account.

For further Model Program details, including a full list of Program Managers, please see the Model Program Wrap Fee Program Brochure. We provide this brochure to you prior to or concurrent with your enrollment in the Model Program. Please read it thoroughly before investing.

Effective December 30, 2019, this program will no longer be offered to new accounts. Afterwards the Genesis Model Portfolio Account option will be offered only to new accounts through the Unified Managed Account Program.

VISION2020 WEALTH MANAGEMENT PLATFORM – UNIFIED MANAGED ACCOUNT PROGRAM

The Wealth Management Platform Unified Managed Account Program (“UMA”) provides you with the opportunity to invest your assets across multiple investment strategies and asset classes by implementing an asset allocation strategy. UMA is a Wrap Account program that offers these advisory services along with brokerage and custodial services for a single, annual, asset-based advisory fee.

After you discuss your financial goals and objectives with your Advisory Representative, we will recommend an asset allocation model (“UMA Model”) to you which will consist of:

- a) Investment Strategies serviced and created by investment managers or your Advisory Representative that generally consist of a selection of mutual funds, exchange traded products, equities, and or bonds;
- b) Mutual funds and ETFs (“Funds”);
- c) Or a combination of the preceding bundled together in an investment asset allocation model.

We will recommend a UMA Model to you based on your responses to a Questionnaire and discussion that we have together regarding among other things, investment objective, risk tolerance, investment time horizon, account restrictions, and overall financial situation. In addition, you can place reasonable restrictions on investments held within your UMA account. All recommendations in the UMA are made on a discretionary basis, which means your Advisory Representative can act without your prior approval.

For further UMA details, please refer to The Wealth Management Platform – Unified Managed Account Wrap Fee Program Brochure. We provide this brochure to you prior to or concurrent with your enrollment in UMA. Please read it thoroughly before investing.

ASSETMARK PLATFORM

OPUS may offer advisory services to Clients by selecting the AssetMark Platform. For more information regarding the AssetMark Platform, refer to AssetMark Platform Disclosures Brochure.

The minimum investment required on the AssetMark Platform depends upon the Investment Solution chosen for a Client’s account and is generally \$25,000 - \$50,000 for Mutual Fund and \$100,000 for ETF Accounts, and from \$50,000 to \$500,000 for Privately Managed and Unified Managed Accounts, depending on the investment strategy selected for the account. These minimums are described in more detail in the AssetMark Platform Disclosure Brochure. Accounts below the stated minimums may be accepted on an individual basis at the discretion of AssetMark.

THIRD PARTY ADVISORY SERVICES

We offer our clients the services of various third-party investment advisors (“Third-Party Advisory Services”) for the provision of certain investment advisory programs including mutual fund wrap and separately managed account programs.

If you are interested in learning more about any of these services, please note that a complete description of the programs, services, fees and payment structure, and termination features is available via the applicable Third Party Advisory Service’s disclosure brochures, investment advisory contracts, and account opening documents.

In connection with these arrangements, we will provide assistance in the selection and ongoing monitoring of a particular Third-Party Advisory Service. Factors that we consider in the selection of a particular third-party advisor may include but may not be limited to: i) our assessment of a particular Third-Party Advisory Service; ii) your risk tolerance, goals, objectives and restrictions, as well as investment experience; and, iii) the assets you have available for investment.

You should know that the services provided by us through the use of Third-Party Advisory Services are under certain conditions directly offered by them to you. The fees charged by Third-Party Advisory Services who offer their programs directly to you may be more or less than the combined fees charged by the Third-Party Advisory Service and us for our participation in the investment programs. However, when using the services of Third-Party Advisory Services directly, you do not receive our expertise in developing an investment strategy, selecting a Third-Party Advisory Service, monitoring the performance of your account and changing a Third-Party Advisory Service provider when appropriate.

RETIREMENT PLAN CONSULTING SERVICES

We offer retirement consulting services to employee benefit plans and their fiduciaries. The services are designed to assist the plan sponsor (the “Company”) in meeting their management and fiduciary obligations to the plan under ERISA. Retirement consulting services will consist of general or specific advice, and may include any one or all of the following:

1. Strategic Planning and Investment Policy Development/Review.
2. Plan Review.
3. Plan Fee and Cost Review.
4. Acting as Third-Party Service Provider Liaison.
5. Assessment of Plan Investments and Investment Options.
6. Plan Participant Education and Communication.

The Company may also engage us to provide the following additional services, for separate compensation:

1. Review of Executive Benefits.
2. Assist with Plan Conversion.
3. Merger and Acquisition Assistance.
4. Assist with Corrective Actions to Comply with Applicable Regulations.
5. Coordination with Other Advisers.

We will determine with the Company in advance the scope of services to be performed and the fees for all requested services. Prior to engaging us to provide pension consulting services, the Company will be required to enter into a written agreement with us setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the relevant fees and fee paying arrangements. The services outlined above that we provide are explained in more detail in the written agreement.

When we perform our agreed upon services, we will not be required to verify the accuracy or consistency of any information received from the Company.

We will serve in a fiduciary capacity with respect to some of the services that we provide which will be further explained in the written agreement we sign with the Company. The Company is always free to seek independent advice about the appropriateness of any recommendations made by us.

FINANCIAL PLANNING

We provide a variety of financial planning services to you regarding the management of your financial resources, based upon an analysis of your needs. Generally, such financial planning services will involve preparing a financial program for you based on your financial circumstances and objectives. This

information typically covers present and anticipated assets and liabilities, including insurance, savings, investments and anticipated retirement or other employee benefits.

Our financial planning typically includes general recommendations for a course of activity or specific actions that you should take. 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 to invest funds in certain securities.

Other financial planning services that we may provide include ongoing financial counseling, account review, securities research and other advisory services related to investments.

Financial planning services to be provided to you will be outlined on the client agreement that you sign with us.

NON-DISCRETIONARY INVESTMENT ADVISORY SERVICES

We may offer you on a one-time, on-going, or periodic basis one or more of the following non-discretionary investment advisory services (“Non-Discretionary Services”).

1. **Investment Portfolio Monitoring**

We may monitor your portfolio(s) and provide investment advice on a non-discretionary basis to you through mail, phone or email communication. Investment advice may be provided regarding asset allocation, investment portfolio construction, investment selection, investment adviser retention or other services as agreed upon by both parties.

2. **Other Services**

We are also available for the following non-discretionary advisory services.

- Financial Counseling – We may offer assistance to you in designing personal financial goals and objectives, as well as, recommendations regarding the allocation of present financial resources among different types of assets.
- Review of Accounts – We may perform an annual review and consultation of your account. Such review and consultation typically contain advice regarding recommended changes to your investments and recommendations for implementation of proposed changes.
- Securities Research – We may provide research and advice regarding specific securities, industries or markets.
- Other Advisory Services Relating to Securities – We will offer other advisory services as described in the Client Agreement that you will sign with us.

We do not qualify to, and do not render legal, tax or accounting advice or prepare any legal documents for you unless our Advisory Representative is duly licensed as an attorney or accountant in your state of residence. Your personal attorney will be solely responsible for providing legal advice, legal opinions, legal determinations and legal documents. Your personal tax adviser or accountant will be solely responsible for any tax or accounting services provided to you.

If you receive Non-Discretionary Advisory services, you may purchase securities or insurance products offered through us pursuant to a plan or consultation. Advisory Representatives typically receive commissions as Registered Representatives of FSC or insurance agents in connection with such

transactions. Thus, the Advisory Representative may have a conflict of interest when providing these services because they may receive additional compensation if you choose to execute transactions through them in this capacity. Advisory Representative and OPUS may also be additionally compensated if you choose to implement recommendations by retaining Advisory Representative to provide other investment advisory products or services. You are under no obligation to purchase products or services by us or our Advisor Representatives.

SEMINARS

Our Advisory Representatives are permitted to hold investment-related seminars and/or educational events to existing clients, prospective clients, and the general investing public. The seminars feature general investment-related advice for educational purposes and can include both securities and non-securities topics. No specific individualized investment advice regarding investment objectives or investment related needs of the attendees, listeners, or audience is rendered during seminars. However, participants are free to schedule meetings with the Advisory Representatives(s) in an effort to obtain personalized investment advice.

Item 5 - Fees and Compensation

VISION2020 WEALTH MANAGEMENT PLATFORM – ADVISOR MANAGED PORTFOLIOS PROGRAM

We offer Advisor Managed Portfolios as an account where no separate transactions charges apply and a single fee is paid for all advisory services and transactions ("Wrap Account"). In a Wrap Account, the wrap fee can be set-up so that either the Firm or the Advisory Representative pays the underlying ticket charges for securities transactions. In cases where the Advisory Representative pays the ticket charges, the Advisory Representative may be incentivized to trade less frequently which results in the Advisory Representative retaining a greater portion of the wrap fee. The Firm has policies and procedures to monitor and reduce the risk of this occurring.

We also offer Advisor Managed Portfolios with separate advisory fees and transaction charges ("Non-Wrap Account"). As such, in addition to the quarterly account fee described below for advisory services, you may also pay separate per-trade transaction charges.

You will pay a quarterly account fee, in advance, based upon the market value of the assets held in your account as of the last business day of the preceding calendar quarter. Your account fees are negotiable and will be debited from your account by our custodian. If you terminate your participation in this program, you will be entitled to a pro-rata refund of any prepaid quarterly fees based upon the number of days remaining in the quarter after the date upon which the notice of termination is received.

Each of our Advisory Representatives negotiates his or her own account fee schedule. Mutual funds and ETFs invested in the account have their own internal fees which are separate and distinct from the program account fees (for more information on these fees, see the applicable fund prospectus).

Some Fund fees include 12b-1 fees which are internal distribution fees assessed by the fund, all or a portion of which are paid to the distributor(s) of the funds. The Firm and your Advisory Representative do not retain 12b-1 fees paid by Funds.

In certain instances, you may be eligible to purchase certain mutual funds and ETFs without incurring transaction charges subject to certain conditions. For details, please refer to Item 4 (No Transaction Fee Programs) of the Advisor Managed Portfolios wrap fee brochure. If your assets are held in a certain type of Wrap Account, an incentive may exist for your Advisory Representative to purchase mutual funds or exchange-traded funds that are part of the No Transaction Fee Programs to avoid paying a transaction fee.

For complete fee details, including account fee schedule guidelines and a list of transaction charges, please see the Advisor Managed Portfolios Wrap Fee Program Brochure.

VISION2020 WEALTH MANAGEMENT PLATFORM – GENESIS MODEL PORTFOLIOS PROGRAM

We offer the Genesis Model Portfolios Program as an account where no separate transactions charges apply, and a single fee is paid for all advisory services and transactions ("Wrap Account").

You will pay a quarterly account fee, in advance, based upon the market value of the assets held in your account as of the last business day of the preceding calendar quarter. Your account fees are negotiable and will be debited from your account by our custodian. If you terminate your participation in this program, you will be entitled to a pro rata refund of any prepaid quarterly fees based upon the number of days remaining in the quarter after the date upon which the notice of termination is received.

Each of our Advisory Representatives negotiates his or her own account fee schedule. The account fees paid by client include portions paid to your Advisory Representative ("Advisor Fees"), as well as to the Firm, the custodian, and the third-party money managers selected ("Program Fees"). Advisor fees are set independently regardless of manager selected. Mutual funds and ETFs invested in the account also have their own internal fees ("internal fund expenses") which are separate and distinct from the program account fees (for more information on these fees, see the applicable fund prospectus). Since fees billed to your Model Program account are comprised of both program fees and advisor fees, Advisory Representatives may have an incentive to select third party money managers with lower program fees in order to manage the overall fee charged to you. You and your Advisory Representative should consider the overall fees and expenses, including internal fund expenses, when selecting managers and other portfolio investments.

For complete fee details, including account fee schedule guidelines, please see the Model Program Wrap Fee Brochure.

VISION2020 WEALTH MANAGEMENT PLATFORM – SMA AND UMA PROGRAM

We offer WMAP as an account where no separate transactions charges apply and a single fee is paid for all advisory services and transactions ("Wrap Account").

You will pay a quarterly account fee, in advance, based upon the market value of the assets held in your account as of the last business day of the preceding calendar quarter. Your account fees are negotiable and will be debited from your account by our custodian. If you terminate your participation in this program,

you will be entitled to a pro- rata refund of any prepaid quarterly fees based upon the number of days remaining in the quarter after the date upon which the notice of termination is received.

Each of our Advisory Representatives negotiates his or her own account fee schedule. The account fees paid by client include portions paid to your Advisory Representative (“Advisor Fees”), as well as to the Firm, the custodian, and the third-party money managers selected (“Program Fees”). Advisor fees are set independently regardless of manager selected. Mutual funds and ETFs invested in the account also have their own internal fees (“internal fund expenses”) which are separate and distinct from the program account fees (for more information on these fees, see the applicable fund prospectus). Since fees billed to your WMAP account are comprised of both program fees and advisor fees, Advisory Representatives may have an incentive to select third party money managers with lower program fees in order to manage the overall fee charged to you. You and your Advisory Representative should consider the overall fees and expenses, including internal fund expenses, when selecting managers and other portfolio investments.

For complete fee details, including account fee schedule guidelines, please see the WMAP Wrap Fee Program Brochure.

ASSETMARK PLATFORM

Fees and compensation for using the AssetMark Platform, are provided in more detail in the AssetMark Platform Disclosure Brochure. Discretionary Manager Fee schedules are included in the Client Billing Authorization or the Appendix A to the Client Service Agreement.

The fees applicable to each Account on the AssetMark Platform may include:

1. Financial Advisors Fee
2. Platform Fee
3. Investment Manager Fee
4. Initial Consulting Fees

Other fees for special services may also be charged. The Client should consider all applicable fees. Each of our Advisory Representatives negotiates their own account fee schedule.

Client fees are payable quarterly, in advance, based on assets under management. Clients may terminate AssetMark accounts at any time and receive a full pro-rata refund of any unearned fees.

For complete fee details, including account fee schedule guidelines, please see the AssetMark Program and Third-Party Money Manager Brochures.

THIRD PARTY ADVISORY SERVICES

Compensation in connection with Third Party Advisory Services generally consists of six elements:

i) management fees paid to Third Party Money Manager; ii) management fees paid to us as outlined in the client agreement that you sign with us; iii) transaction costs – if applicable – which are charged when

purchasing and selling such securities; iv) custody fees; v) revenue sharing paid to the Firm and vi) fees paid to us for administrative and supervisory services. Your account will be held with the Third-Party Advisory Service custodian where your fees will be assessed and deducted.

Each of our Advisory Representatives negotiates their own account fee schedule. The account fees paid by client include portions paid to your Advisory Representative (“Advisor Fees”), as well as to the Firm, the custodian, and the third-party money managers selected (“Program Fees”). Mutual funds and exchange traded funds invested in the account also have their own internal fees (“internal fund expenses”) which are separate and distinct from the program account fees (for more information on these fees, see the applicable fund prospectus). Since fees billed to your account for Third Party Advisory Services are typically comprised of both Program Fees and Advisor Fees, Advisory Representatives may have an incentive to select third party advisory services with lower platform program fees in order to manage the overall fee charged to you. You and your Advisory Representative should consider the overall fees and expenses, including internal fund expenses, when selecting managers and other portfolio investments.

For further details, please see the applicable Third-Party Money Manger’s disclosure brochures, investment advisory contracts and account opening documents.

Each of our Advisory Representatives negotiates his or her own management fee schedule; however, management fees charged by the Third-Party Advisory Service in connection with their services are not negotiable.

RETIREMENT PLAN CONSULTING SERVICES

We will bill the Company for Retirement Plan Consulting Services based upon a percentage of the Plan assets. The exact fee is negotiated in advance of services rendered and is disclosed in the executed written agreement that we sign with the Company. Fees will be billed quarterly in advance. In special circumstances other fee-paying arrangements may be negotiated.

The Company may terminate the written agreement they signed with us within five days of the execution date without penalty. Thereafter, the written agreement may be terminated by us or the Company at any time upon 60 days’ prior written notice. Upon termination, we will deliver a final billing statement for unbilled work performed prior to termination, and the Company will have a period of 30 days within which to deliver payment. If termination occurs after the first five days, our fee will be credited back to the Company on a pro-rata basis for the unused portion of the billing period. When we calculate the credit, we will subtract any unbilled work we performed for the Company prior to termination.

Each of our Advisory Representatives negotiates their own fee schedule.

FINANCIAL PLANNING

We are engaged in the business of rendering investment advice to clients on their overall investment portfolios and providing clients with a comprehensive investment and financial plan which will assist the client in managing his or her assets so that they will produce income for personal and/or business needs. We will perform the above services for a client for a fee which varies according to the complexity of the work and the request of the client. Generally, in those instances where we have been engaged by the client

to prepare a comprehensive investment and financial plan, the client may be required to pay a portion of the fee prior to our commencement of work and the remainder of the fee will be due upon delivery of the work product. Client will be asked to execute an Agreement for Investment Advisory Service which may be rescinded within ten days from the date of execution and which will provide a refund of all fees upon rescission or at any time prior to the commencement of work on the plan. We will come to an agreement with you on a maximum fee of one percent (1%) of annual income or one-half (1/2%) of net worth, whichever is greater, prior to beginning a plan. In general, a minimum fee of \$3,500 will be charged for financial plans.

For all of the above, client may terminate, without penalty, any agreement within five (5) business days after entering into a contract. In the event client does terminate within the five (5) business days, client understands and agrees that client will remain liable to us for actual time spent by us prior to client's notice of termination. All notices of termination must be in writing. After the preparation of a comprehensive financial plan, we offer advisory services on an ongoing basis for a negotiated contract fee. We may provide incidental consultations for clients that do not wish to have a comprehensive financial plan prepared at the rate of up to \$300 per hour. All fees are negotiable.

When you receive financial planning services you may also purchase securities or insurance products offered through FSC pursuant to the plan or consultation. Members of our Firm may receive commissions as Registered Representatives of FSC or insurance agents in connection with such transactions. Thus, we may have a conflict of interest when providing financial planning services to you as there may be an incentive for us to recommend specific courses of action through our financial planning services that may lead to members of our Firm receiving additional compensation.

Please be aware that you are under no obligation to purchase products or services recommended by us or members of our Firm in connection with our providing you with financial planning services, or any advisory service that we offer.

NEGOTIATION OF FEES

Fees are negotiated on a case-by-case basis, depending on a variety of factors, including the nature and complexity of the particular service, your relationship with us and our Advisory Representative, the size of the Account, the potential for other business or clients, the amount of work anticipated and the attention needed to manage your Account. Please note that the same or similar services to those described above may be available elsewhere to you at a lower cost.

ADDITIONAL FEES AND EXPENSES

Mutual Fund Fees and Charges

Mutual fund investments in the programs that we offer are no-load or load at NAV. Your mutual fund investments may be subject to early redemption fees, 12b-1 fees and mutual fund management fees as well as other mutual fund expenses. These fees are in addition to the fees and expenses referenced above. Please review the mutual fund prospectus for full details.

Variable Annuity Fees and Charges

Variable annuity companies generally impose internal fees and expenses on your variable annuity investment, including contingent deferred sales charges and early redemption fees. In addition, variable annuity companies generally impose mortality charges of approximately 1.25% annually. These fees are in addition to the fees and expenses referenced above. Complete details of such internal expenses are specified and disclosed in each variable annuity company's prospectus. Please review the Variable Annuity prospectus for full details.

Non-Wrap Account Fees and Charges

In addition to the per-trade transaction charges referenced above, you will also be subject to per-trade confirmation fees as disclosed on your trade confirmation (typically \$4.00 per trade) and an additional fee of \$1.50 for each trade confirmation that you do not elect to receive electronically. You may also be subject to an additional, per-trade transaction charge on the selling of certain securities as disclosed on your trade confirmation (generally less than \$1.00 on trades of \$50,000 or less). These fees are not shared with us but are transaction charges paid to FSC and our custodian. Please see Item 10 which explains our relationship with FSC.

There are additional fees relating to IRA and Qualified Retirement Plan accounts that you may incur such as establishment, maintenance and termination fees. You will find these fees disclosed in the account application paperwork provided to you associated with these accounts.

Wrap Account Fees and Charges

For Advisory Programs that we offer Wrap Account pricing, the fee for transactions executed in your account are included in your quarterly account fee. As a result, we may charge you a higher quarterly account fee for a Wrap Account than a Non-Wrap account with separate advisory fees and transaction charges. Please consider that depending upon the level of the wrap fee charges, the amount of portfolio activity in the account, the value of services that are provided under the investment program, and other factors, the wrap fee may or may not exceed the aggregate cost of services if they were to be provided separately. Generally, wrap programs are relatively less expensive for actively traded accounts. However, they may result in higher overall costs to the Client in accounts that experience little trading activity.

For certain Advisor Managed Portfolio wrap accounts, broker-dealers may assess the transaction charges to our Advisory Representatives. As a result, Advisory Representatives may also have incentive to trade your Wrap Account less often or to trade your account with certain securities where transaction charges may be waived by the clearing firm or product sponsor.

There are additional fees relating to IRA and Qualified Retirement Plan accounts that you may incur such as establishment, maintenance and termination fees. You will find these fees disclosed in the account application paperwork provided to you associated with these accounts.

Other Products and Services Fees and Charges:

In addition to providing advisory services, our Advisory Representatives will likely also sell you securities products and other investment and insurance products in their capacity as registered representatives of FSC

and as licensed insurance agents. We may receive additional compensation in connection with this activity and the amount of compensation will depend on the type of product purchased. Advisory Representatives will have a greater financial incentive to sell certain products as opposed to others (for example, in the case of mutual funds those that have a higher 12b-1 fee than others). While security sales are reviewed for suitability by an appointed supervisor, you should be aware of the incentives Advisory Representatives have to sell certain securities products and are encouraged to ask us about any conflict presented.

Please be aware that you are under no obligation to purchase products or services recommended by us or members of our Firm in connection with providing you with any advisory service that we offer.

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

Not applicable. We do not charge performance-based fees.

Item 7 - Types of Clients

Our Advisory Representatives provide investment advisory services to:

- Individuals
- Pension and profit-sharing plans
- Trusts
- Estates or charitable organizations
- Corporations
- Other business entities

Our minimum account size requirements by account type are as follows:

| Program | Requirements |
|---|---|
| VISION2020 Wealth Management Platform – Advisor Managed Portfolios | \$50,000 |
| VISION2020 Wealth Management Platform – Genesis Model Portfolios Program | The program minimum for Model Program is \$5,500. The specific minimum varies according to the Program Manager and Asset Allocation Model selected. |
| VISION2020 Wealth Management Platform – Unified Managed Account Program | The program minimum for Model Program is \$5,500. The specific minimum varies according to |

| | |
|--|---|
| | the investment manager and asset allocation model selected. |
| Third Party Advisory Services | Third Party Advisory Services set their own minimums. |
| A+ Advisory Account Program – 3MK / 4MK Accounts | \$100,000 – Equity / Balanced Accounts \$200,000 – Fixed Income Accounts |
| Financial Planning | No minimum |
| Consulting Services | No minimum |
| Non-Discretionary Investment Services | No minimum |
| Retirement Plan Consulting | No minimum |

All account minimums may be waived in the sole discretion of the Program Sponsor.

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

Our Advisory Representatives may rely on various types of tools and methods to assist in recommending or selecting investment strategies to you, including asset allocation and various types of software. You should note that our advisory services are generally designed for strategic long-term investing. However, short-term tactical investment strategies may also be made available to accommodate certain circumstances. Investment returns are highly dependent on the value of underlying securities which are impacted by trends in the various investment markets. Under the Third-Party Advisory Services Program, each third-party asset manager will have its own methods of analysis, investment strategies and unique investment risks that should also be reviewed and considered.

Methods of Analysis

When analyzing investments that may be right for you, we may use both Fundamental and Technical Analysis. Fundamental analysis is security analysis grounded in basic factors such as company earnings, balance sheet variables and management quality which are used to predict the future value of an investment. Information such as interest rates, GNP, inflation and unemployment may be used to predict the direction of the economy and therefore the stock market. Technical analysis is the practice of using statistics to determine trends in security prices and make or recommend investment decisions based on those trends.

Technical analysis focuses on matters such as trade volume, demand, and volatility to help determine the market forces at work on a certain security or on the securities market as a whole.

Investment Strategies

Subject to suitability requirements, we generally advise the long-term purchase of mutual funds and/or exchange traded funds rather than individual issue securities to our clients in an effort to achieve sufficient diversification. Strategies utilizing individual issue securities are available upon request and consistently considered for clients investing over \$1,000,000. In some cases, recommend the selling of covered call options to add additional income and some downside risk protection. All clients using options as an investment strategy will be provided a copy of the *Characteristics and Risks of Standardized Options* booklet.

Methods of Analysis Risks

Fundamental Analysis – When using Fundamental Analysis, we generally rely on, among other things, company earnings, balance sheet variables and management quality which are used to predict the future value of an investment. Data we review is generally considered reliable, but we cannot guarantee, nor have we verified its accuracy. In addition, the data that we review is sometimes subjective in nature and open to interpretation. Even if our data and interpretation of the data is correct, there may be other factors that determine the value of securities other than those considered in Fundamental Analysis.

Technical Analysis – When using Technical analysis, we review statistics to determine trends in security prices and make our investment decisions based on those trends. This analysis may only be able to predict how an investment will perform short-term. In addition, this analysis does not take into account, the more fundamental properties of what an investment may be worth such as company performance and balance sheet variables which may play a part in determining the value of an investment.

Investment Strategy Risks

Long-term purchases – Using a long-term purchase strategy generally assumes the Financial Markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market in which you are invested or perhaps just your particular investment will go down over time even if the overall Financial Markets advance. Purchasing investments long-term may create an opportunity cost - “locking-up” assets that may be better utilized in the short-term in other investments.

Short-term purchases – Using a short-term purchase strategy generally assumes that we can predict how Financial Markets will perform in the short-term which may be very difficult. There are many factors that can affect Financial Market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Short sales – We do not recommend short sales.

Margin – Using margin involves the use of leverage by borrowing money to purchase securities. If the price of the purchased security decreases, you risk losing significantly more money than your initial investment. Further risks are disclosed in the margin agreement you will sign before we engage your account in this activity.

Options – We may use options to increase income earned off of a diversified portfolio of investments by using call options. In addition, if an investor is especially risk averse, yet still wants to invest in equities, put options and in-the-money call options may be used to partially reduce the risk. Options strategies involve risks and are not suitable for all investors. All clients using options as an investment strategy will be provided a copy of the *Characteristics and Risks of Standardized Options* booklet.

Security Type Risks

Stocks – Investing in stocks involves the assumption of risk including:

- Financial Risk: which is the risk that the companies we recommend to you may perform poorly which will affect the price of your investment.
- Market Risk: which is the risk that the Stock Market will decline, decreasing the value of the securities we recommend to you with it.
- Inflation Risk: also called purchasing power risk, is the chance that the cash flows from an investment won't be worth as much in the future because of future changes in costs of goods and services.
- Political and Governmental Risk: which is the risk that the value of your investment may change with the introduction of new laws or regulations.

Bonds – Investing in bonds involves the assumption of risk including:

- Interest Rate Risk: which is the risk that the value of the bond investments we recommend to you will fall if interest rates rise.
- Call Risk: which is the risk that your bond investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.
- Default Risk: which is the risk that the bond issuer may be unable to pay you the contractual interest or principal on the bond in a timely manner or at all.
- Inflation Risk: also called purchasing power risk, is the chance that the cash flows from an investment won't be worth as much in the future because of future changes in costs of goods and services.

Mutual Funds – Investing in mutual funds involves the assumption of risk including:

- Manager Risk: which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- Market Risk: which is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- Inflation Risk: also called purchasing power risk, is the chance that the cash flows from an investment won't be worth as much in the future because of future changes in costs of goods and services.

Exchange Traded Funds – Investing in Exchange Traded Funds can involve the risks associated with stocks and/or bonds depending upon the securities held by the fund.

Options – Options strategies involve risks and are not suitable for all investors. All clients using options as an investment strategy will be provided a copy of the *Characteristics and Risks of Standardized Options* booklet.

Listed above are some of the primary risks associated with the way we recommend investments to you, please do not hesitate to contact us to discuss these risks and others in more detail. In instances where we recommend that a third party manage your assets, please refer to the third party’s ADV and associated disclosure documents for details on their investment strategies, methods of analysis and associated risks.

Investing in securities involves risk of loss that you should be prepared to bear.

In advising retail clients of OPUS investing in AssetMark Platform, OPUS may select from mutual funds, Exchange Traded Funds (ETF’s), and other investment solutions offered on the Platform. These solutions are provided by a number of institutional investment strategists and based on the information, research, asset allocation methodology and investment strategies of these institutional strategists, including AssetMark.

OPUS also introduces clients to, and advises on the selection of, independent investment managers who provide discretionary management of individual portfolios using a variety of different securities analysis methods, sources of information and investment strategies. Clients will receive a separate disclosure brochure from these investment managers regarding their investment advisory services.

With respect to clients investing in the AssetMark Platform, OPUS introduces clients to, and advises on the selection of, independent investment managers who provide discretionary management of individual portfolios including a wide variety of security types. Clients will receive a separate disclosure from such investment managers regarding any such investment manager’s advisory services.

Item 9 - Disciplinary Information

There are no legal or disciplinary events that are material to your evaluation of our advisory business or the integrity of our management.

Item 10 - Other Financial Industry Activities and Affiliations

All representatives of our firm that provide advice to you (“Advisory Representatives”) are associated with FSC Securities Corp. (“FSC”) as Registered Representatives. FSC is a diversified financial services company registered with the Financial Industry Regulatory Authority (“FINRA”) as a broker-dealer engaged in the offer and sale of securities products. Our Advisory Representatives may recommend the purchase of securities offered by FSC. If you purchase these products through them, they will receive normal commissions which may be in addition to customary advisory fees. As such, Advisory

Representatives may have an incentive to sell you commissionable products in addition to providing you with advisory services when such commissionable products may not be suitable. Alternatively, they may have an incentive to forego providing you with advisory services when appropriate, and instead recommend the purchase of commissionable investments, if they deem that the payout for recommending the purchase of these investments would be higher than providing management advice on these products for an advisory fee. Therefore, a conflict of interest may exist between their interests and your best interests.

While our security sales are reviewed for suitability by an appointed supervisor, you should be aware of the incentives Advisory Representatives have to sell certain securities products and you are encouraged to ask us about any conflict presented.

Please be aware that you are under no obligation to purchase products or services recommended by us or members of our Firm in connection with providing you with any advisory service that we offer.

We also furnish advice on insurance, pension and profit-sharing plans, real estate, and other financial services directly or through affiliates.

General securities accounts for our brokerage customers are maintained and custodied on a fully disclosed basis by Pershing, LLC which is both a registered broker-dealer and an investment adviser.

In addition to our association with FSC, we have Related Persons (as defined below) that are real estate broker/dealers. Related Persons are defined as entities that we control or control us or are under common control with us.

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

We have adopted a Code of Ethics (the “Code”) to address securities-related conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes our policies and procedures developed to protect your interests in relation to the following topics:

- The duty at all times to place your interests first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code and to avoid any actual or potential conflict of interest or any abuse of an employee’s position of trust and responsibility;
- The fiduciary principle that information concerning the identity of your security holdings and financial circumstances are confidential; and
- The principle that independence in the investment decision-making process is paramount.

We will provide a copy of the Code to you or any prospective client upon request.

Advisory Representatives may recommend securities to you or buy or sell securities for your account at or about the same time they may buy or sell the same securities in their own account. As such, there may be

instances where the Advisory Representatives interests may appear to be placed ahead of yours. To mitigate this conflict, our firm policy prohibits Advisory Representatives from receiving a better price on their order, if you and they invest in the same security on the same side of the market on the same day.

Privacy Notice:

We have adopted the following privacy policy:

OPUS, an independent financial planning firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of the services provided by OPUS. We do not disclose information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use health and financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- ❑ We limit employee and affiliate access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you in order to execute some transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- ❑ We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- ❑ The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about your health to the extent that it is needed for the planning process, information about transactions between you and third parties, and information from consumer reporting agencies.
- ❑ For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- ❑ We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- ❑ Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.

Item 12 - Brokerage Practices

We do not engage in any soft dollar practice.

As described in Item 10, our Advisory Representatives are also Registered Representatives of FSC, a FINRA registered broker-dealer. In order to meet its FINRA supervisory obligations, FSC requires that all investment advisory activities that we conduct be processed through FSC's clearing relationships with Pershing LLC ("Pershing"). As a result, we do not have the discretion to choose the broker-dealer or commission rates to be paid. However, we do believe that Pershing's blend of execution services, commission and transaction costs as well as professionalism will allow us to seek best execution and competitive prices.

In connection with the provision of Third-Party Advisory Services, our choice of custodian will be limited to those choices offered by the Third-Party Advisory Service.

We may aggregate your orders with those of other clients in a bunched trade or trades when securities are purchased or sold. For each account that we include in the bunched trade, we must reasonably believe that the bunched order is consistent with our duty to seek best execution and may benefit you and each client participating in the aggregated order. The average price per share of each bunched trade is allocated to each account that participates in the bunched trade. Accounts that participate in the same bunched trade are charged transaction costs, if applicable, in accordance with their advisory contracts.

If a bunched order cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day may be allocated in a manner that is consistent with the initial pre-allocation. Partial fills will be allocated in a way that does not consistently advantage or disadvantage particular client accounts.

The aggregation and allocation practices of mutual funds and third-party managers that we recommend to you are disclosed in the respective mutual fund prospectuses and third-party manager disclosure documents which will be provided to you.

On the AssetMark Platform, OPUS assists the client in selecting the risk/return objective and Portfolio Strategists that best suit the client's objectives. The client then specifically directs the account to be invested in accordance with the chosen investment solution. When the client selects the investment solution, the client further directs that the account be automatically adjusted to reflect any adjustment in the asset allocation by the selected Portfolio Strategist. This client authorization results in the purchase and sale of certain mutual funds or EFTs (or transfers between variable annuity sub-accounts) without further authorization by the client or any other party at such time as the Portfolio Strategist changes the composition of the selected model asset allocation.

The client receives confirmation of all transactions in the account and is free to terminate participation in the Platform and retain or dispose of any assets in the account at any time. OPUS has no authority to cause any purchase or sale of securities in any client account or change the selected model asset allocation or to direct the account to be invested in any manner other than as previously authorized by the client on the AssetMark Platform.

If a client selects an IMA, UMA or CMA investment solution on the AssetMark Platform, the third-party Discretionary Managers are granted the authority to manage the accounts on a discretionary basis, including the authority to buy, sell, select, remove and select securities and other investments for the account, and to select broker-dealers or others through which transactions will be effected.

Item 13 - Review of Accounts

Each security purchase or sale affected by our Advisory Representatives in your Account is monitored for suitability by an appointed supervisor. In addition, our Advisory Representatives periodically review your accounts as needed, but no less than annually. Such review and consultation typically contain, when warranted, advice regarding recommended changes to your investments and recommendations for implementation of proposed changes.

You will receive monthly and/or quarterly account statements and may receive, depending on the advisory program we offer, a quarterly performance report (“QPR”).

Investors participating in the AssetMark Platform will receive periodic custodial account statements (not less frequently than quarterly) from their account Custodian.

Additionally, OPUS issues periodic reports to its investment advisory clients. These reports generally contain a list of assets, investment results, and statistical data related to the client’s account, and are made available via mail or electronic delivery. The information in these reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Clients are urged to carefully review these reports and compare the custody statements they receive from their custodian.

Item 14 - Client Referrals and Other Compensation

As discussed previously, all our Advisory Representatives are Registered Representatives of FSC. This arrangement requires us to offer you advisory services and programs sponsored or approved by FSC. FSC sets limits on how much we can charge you for these advisory services. Some advisory programs have higher fee limits than others. As such, there may be an incentive for Advisory Representatives to recommend to you advisory services or programs with higher limits. In addition, FSC may charge certain usage fees and expenses to use their advisory programs which may decrease the amount of money we make when offering investment advice to you. Therefore, there may be an incentive to provide you with advisory programs and services that may be cheaper for us to use but not as suitable to your needs as other advisory programs that FSC sponsors which may be more expensive for us to use.

In addition, FSC offers our Advisory Representatives educational, training and incentive programs for those Advisory Representatives that meet certain production goals. There may be an incentive for Advisory Representatives to manage your account in ways that assist them in meeting these production goals even if such strategies may not always be suitable for your account.

Certain Third-Party Advisory Service programs may provide our Advisory Representatives with the opportunity to attend training or education conferences. Such conferences include the payment or reimbursement of travel, meals and lodging expenses for attendees. Payment/reimbursement of expenses

is not contingent upon sales targets or contests, but rather on total assets managed on their respective Third-Party Advisory Service platforms. Advisory Representatives may have an incentive to recommend Third-Party Advisory Service programs that provide them with the above referenced opportunities over those that do not.

When we offer you a Wrap Account, the fee for transactions executed in your account are included in your quarterly account fee. However, FSC will still assess the transaction charges to us. This may influence us to charge you a higher quarterly account fee than we would otherwise charge you in an effort to recoup from you the transaction charges FSC charges us. We may also have incentive to trade your account less often to lessen our transaction fees or to trade your account with certain securities where FSC reduces or eliminates the transaction charges (such as the Focus Elite and FundVest Programs mentioned below) to us even if such trading strategies may not always be suitable for your account.

Our Advisory Representatives may participate in the Focus Elite and Fund Vest Programs, provided by FSC. In these programs, transaction charges for purchasing securities that participate in these programs may be reduced or waived. This may provide us with incentive to invest your account in these securities over securities that do not participate in these programs to reduce our transaction costs even if such investments may not always be suitable for your account.

While our security sales are reviewed for suitability by an appointed supervisor, you should be aware of the incentives we and our Advisory Representatives have to sell certain securities products and are encouraged to ask us about any conflict presented.

We may pay referral fees to unaffiliated third parties (Solicitors) equal to a percentage of the advisory fees collected from clients that Solicitors referred to our Advisory Representatives. Specific terms and obligations of the Solicitor and our Advisory Representatives are outlined in a written solicitation agreement.

With respect to the AssetMark Platform, OPUS may, subject to negotiation with AssetMark, receive certain allowances, reimbursements or services from AssetMark in connection with OPUS's investment advisory services to its clients, as described below and in further detail in the Appendix 1 of the AssetMark Platform Disclosure Brochure.

Under AssetMark's Business Development Allowance program, OPUS may receive a quarterly business development allowance for reimbursement of qualified marketing/practice development expenses incurred by the Financial Advisors. These amounts vary depending on the value of the assets on the AssetMark Platform held by Clients of the Financial Advisor.

OPUS may enter into marketing arrangements with AssetMark whereby OPUS receives compensation and/or allowances in amounts based either upon a percentage of the value of new or existing Account assets of Clients referred to AssetMark by OPUS or a flat dollar amount.

AssetMark may sponsor annual conferences for participating Financial Advisory Firms and/or Financial Advisors designed to facilitate and promote the success of the Financial Advisory Firm and/or Financial Advisor and/or AssetMark advisory services.

Financial Advisors may receive discounted pricing from AssetMark for practice management and marketing related tools and services.

AssetMark offers the Community Inspiration Award to honor selected Financial Advisors across the US who have inspired others by supporting charitable organizations in their communities. AssetMark will

make a cash donation, subject to the published rules governing the program, to OPUS's nominated charity in accordance with guidelines as outlined in the AssetMark Platform Disclosure Brochure.

Item 15 - Custody

OPUS does not provide custodial services to its clients. Client assets are held with banks, financial institutions or registered broker-dealers that are "qualified custodians." Clients will receive statements directly from the qualified custodians at least quarterly. We urge clients to carefully review those statements and compare the custodial records to the reports that we provide them. The information in our reports may vary from custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities.

Item 16 - Investment Discretion

We may manage your accounts on a discretionary basis upon obtaining your consent. Your consent is typically granted and evidenced in the client agreement that you sign with us. We define discretion as: the ability to trade your account, without obtaining your prior consent, the securities and amount of securities to be bought or sold, and the timing of the purchase or sale. It does not extend to the withdrawal or transfer of your account funds.

Investment Representatives may use Third-Party Money Managers in their capacity as Registered Representatives of their Broker-Dealer.

We also offer non-discretionary accounts where your prior verbal or written consent is required for each trade in your account.

Item 17 - Voting Client Securities

The Client retains the right to vote proxies if the Account is invested in a Mutual Fund, ETF or Variable Annuity Investment Solution. If the Account is invested in an IMA, CMA or UMA Investment Solution, the Client designates the applicable Discretionary Manager as their agent to vote proxies on securities in the Account. Client acknowledges that as a result of this voting designation they are also designating the Discretionary Manager as their agent to receive proxies, proxy solicitation materials, annual reports provided in connection with proxy solicitations and other materials provided in connection with the above actions relating to the assets in the Account. However, the Client retains the right to vote proxies and may do so by notifying OPUS in writing of the desire to vote future proxies.

Item 18 - Financial Information

In certain circumstances our Advisory Representatives may use investment discretion in your account, subject to your approval. We are capitalized in full compliance with applicable regulations and do not foresee any financial conditions that may impair our fulfillment of reasonable obligations or contractual commitments to you.

Item 19 - Requirements for State-Registered Advisers

As a firm registered with the North Carolina Secretary of State Securities Division, OPUS is required to provide you with the name, education and background information for each of our Advisory Representatives. They are as follows:

JAMES T. STAPLES, CFP®
YEAR OF BIRTH: 1949

PROFESSIONAL EDUCATION:

Rider College ~ Trenton, NJ **1971**
Bachelor of Science in Commerce and Business Administration

University of South Carolina ~ Columbia, SC **1972**
Master of Business Administration in Finance

BUSINESS AND PROFESSIONAL BACKGROUND:

Opus Financial Advisors, Inc. ~ Statesville, NC
Financial Consultants, Investment Advisor Representative
CEO and President, 1983 to 2019
Chairman and Chief Investment Officer, 2019 to Present

FSC Securities Corporation ~ Atlanta, GA
Broker/Dealer
Registered Representative and Registered Principal, 1983 to Present

Iredell Properties, Inc. ~ Statesville, NC
Real Estate Broker
Owner and President, 1980 to Present

License and Registrations:

James T. Staples is licensed to sell securities and holds the following securities licenses:
CRD #1093646

| | |
|--|------|
| FINRA Series 6 (Investment Representative) ~ | 1983 |
| FINRA Series 63 (Uniform Securities Agent State Law) ~ | 1983 |
| FINRA Series 7 (General Securities Representative) ~ | 1983 |
| FINRA Series 24 (General Securities Principal) ~ | 1986 |
| FINRA Series 51 (Municipal Fund Securities Principal) ~ | 2003 |
| FINRA Series 4 (Registered Options Principal) ~ | 2006 |
| FINRA Series 65 in NC (Uniform Investment Adviser Law) ~ Grandfathered | |

You can verify these licenses online at: <http://finra.org/brokercheck>

James T. Staples is licensed to buy and sell real estate and holds the following licenses:
NC License #58170

| | |
|-------------------------|------|
| NC Real Estate Broker ~ | 1979 |
|-------------------------|------|

You can verify these licenses online at: http://www.members-base.com/ncrec/oecgi3.exe/O4W_LIC_SEARCH_NEW

James T. Staples is licensed to sell insurance and holds the following insurance licenses:
NC License #0005540350

| | |
|---|------|
| NC Life/Accident/Health Insurance ~ | 1983 |
| NC Property & Casualty ~ | 1983 |
| NC Variable Life & Variable Annuity ~ | 2008 |
| NC Medicare Supplement/Long Term Care ~ | 2009 |

You can verify these licenses online at: <https://sbs-nc.naic.org/Lion-Web/jsp/sbsreports/AgentLookup.jsp>

| | |
|--|------|
| Registry of Financial Planning Practitioners ~ | 1985 |
| Certified Financial Planner TM ~ | 1995 |

You can verify this license online at: <http://www.cfp.net/utility/verify-an-individual-s-cfp-certification-and-background>

**James T. Staples has earned certifications and credentials that are required to be explained in further detail. Please refer to the explanations for each designation listed at the end of this document.*

MICHELLE M. ROKES, CFP®
YEAR OF BIRTH: 1957

PROFESSIONAL EDUCATION:

University of North Carolina ~ Charlotte, NC **1977 - 1978**

Warren Wilson College ~ Swannanoa, NC **1979**

BUSINESS AND PROFESSIONAL BACKGROUND:

Opus Financial Advisors, Inc. ~ Statesville, NC
Financial Consultants, Investment Advisor Representative
Vice President, 1989 to Present

FSC Securities Corporation ~ Atlanta, GA
Broker/Dealer
Registered Representative, 1991 to Present

Webb Financial Services, Inc. ~ Statesville, NC
Financial Consultants
Financial Planner, 1988 to 1990

H. Beck, Inc. ~ Rockville, MD
Broker/Dealer
Registered Representative, 1988 to 1991

License and Registrations:

Michelle M. Rokes is licensed to sell securities and holds the following securities licenses:
CRD #1820657

| | |
|--|------|
| FINRA Series 63 (Uniform Securities Agent State Law) ~ | 1988 |
| FINRA Series 7 (General Securities Representative) ~ | 1988 |
| FINRA Series 24 (General Securities Principal) ~ | 2003 |
| FINRA Series 65 (Uniform Investment Adviser Law) ~ | 1995 |

You can verify these licenses online at: <http://finra.org/brokercheck>

Michelle M. Rokes is licensed to sell insurance and holds the following insurance licenses:
NC License #0006553208

| | |
|---|------|
| NC Life/Accident/Health Insurance ~ | 1989 |
| NC Variable Life & Variable Annuity - | 2008 |
| NC Medicare Supplement/Long Term Care ~ | 2010 |

You can verify these licenses online at: <https://sbs-nc.naic.org/Lion-Web/jsp/sbsreports/AgentLookup.jsp>

Certified Financial Planner™ ~

1995

You can verify this license online at: <http://www.cfp.net/utility/verify-an-individual-s-cfp-certification-and-background>

**Michelle M. Rokes has earned certifications and credentials that are required to be explained in further detail. Please refer to the explanations for each designation listed at the end of this document.*

CAROLE W. HENDRIX, CFP®

YEAR OF BIRTH: 1960

PROFESSIONAL EDUCATION:

Robbins School of Business, University of Richmond ~ Richmond, VA

1982

Bachelor of Science in Economics and Finance

BUSINESS AND PROFESSIONAL BACKGROUND:

Opus Financial Advisors, Inc. ~ Statesville, NC

Financial Consultants, Investment Advisor Representative

Vice President, 1996 to Present

FSC Securities Corporation ~ Atlanta, GA

Broker/Dealer

Registered Representative, 1996 to Present

License and Registrations:

Carole W. Hendrix is licensed to sell securities and holds the following securities licenses:

CRD #2804290

FINRA Series 63 (Uniform Securities Agent State Law) ~ 1996

FINRA Series 7 (General Securities Representative) ~ 1996

FINRA Series 65 (Uniform Investment Adviser Law) ~ 1998

You can verify these licenses online at: <http://finra.org/brokercheck>

Carole W. Hendrix is licensed to sell insurance and holds the following insurance licenses:

NC License #0005549740

NC Life/Accident/Health Insurance ~ 1997

NC Variable Life & Variable Annuity ~ 2008

NC Medicare Supplement/Long Term Care ~ 2010

You can verify these licenses online at: <https://sbs-nc.naic.org/Lion-Web/jsp/sbsreports/AgentLookup.jsp>

Certified Financial Planner™ ~

1996

You can verify this license online at: <http://www.cfp.net/utility/verify-an-individual-s-cfp-certification-and-background>

**Carole W. Hendrix has earned certifications and credentials that are required to be explained in further detail. Please refer to the explanations for each designation listed at the end of this document.*

NINA STAPLES LLOYD, CFP® and CRPC®

YEAR OF BIRTH: 1980

PROFESSIONAL EDUCATION:

University of North Carolina ~ Chapel Hill, NC

2002

Bachelor of Arts in Economics and Environmental Science

BUSINESS AND PROFESSIONAL BACKGROUND:

Opus Financial Advisors, Inc. ~ Statesville, NC

Financial Consultants, Investment Advisor Representative

Vice President, 2012 to 2019

President and Chief Executive Officer, 2019 to Present

FSC Securities Corporation ~ Atlanta, GA

Broker/Dealer

Registered Representative and Registered Principal, 2012 to Present

Wells Fargo Bank, NA ~ Chapel Hill, NC

Bank

Relationship Manager, 2005 to 2012

First Citizens Bank ~ Durham, NC

Bank

Branch Management, 2002 to 2005

License and Registrations:

Nina S. Lloyd is licensed to sell securities and holds the following securities licenses:

CRD #5134770

FINRA Series 6 (Investment Representative) ~

2006

FINRA Series 63 (Uniform Securities Agent State Law) ~

2006

FINRA Series 7 (General Securities Representative) ~

2012

FINRA Series 24 (General Securities Principal) ~ 2012
FINRA Series 66 in NC (Uniform Combined State Law/Investment Adviser Rep.) ~ 2012
You can verify these licenses online at: <http://finra.org/brokercheck>

Nina S. Lloyd is licensed to sell insurance and holds the following insurance licenses:
NC License #0007569097

NC Life/Accident/Health Insurance ~ 2012
NC Variable Life & Variable Annuity ~ 2017
You can verify these licenses online at: <https://sbs-nc.naic.org/Lion-Web/jsp/sbsreports/AgentLookup.jsp>

Chartered Retirement Planning CounselorSM ~ 2013
You can verify this license online at: <http://www.cffpdesignations.com/Designee>

Certified Financial PlannerTM ~ 2015
You can verify this license online at: <http://www.cfp.net/utility/verify-an-individual-s-cfp-certification-and-background>

**Nina S. Lloyd has earned certifications and credentials that are required to be explained in further detail. Please refer to the explanations for each designation listed at the end of this document.*

W. ANDREW HOWELL
YEAR OF BIRTH: 1971

PROFESSIONAL EDUCATION:

Catawba College ~ Salisbury, NC 1999
Bachelor of Arts in History

BUSINESS AND PROFESSIONAL BACKGROUND:

Opus Financial Advisors, Inc. ~ Statesville, NC
Financial Consultants, Investment Advisor Representative
Investment Representative, 2015 to Present

FSC Securities Corporation ~ Atlanta, GA
Broker/Dealer
Registered Representative, 2015 to Present

Merrill Lynch ~ Statesville, NC
Broker/Dealer
Financial Advisor, 2012 to 2015

Edward Jones ~ Statesville, NC
Broker/Dealer
Financial Advisor, 2009 to 2012

North Carolina Farm Bureau ~ Statesville, NC
Property/Casualty Insurance
Claims Adjuster, 2005 to 2009

Iredell-Statesville Schools ~ Statesville, NC
Education
Teacher and Coach, 2001 to 2005

Onslow County Schools ~ Jacksonville, NC
Education
Teacher and Coach, 2000 to 2001

License and Registrations:

W. Andrew Howell is licensed to sell securities and holds the following securities licenses:
CRD #5668054

FINRA Series 7 (General Securities Representative) ~ 2009
FINRA Series 66 (Uniform Combined State Law/Investment Advisor Representative) ~ 2009
You can verify these licenses online at: <http://finra.org/brokercheck>

JANNA M. DEEGAN, CPA
YEAR OF BIRTH: 1967

PROFESSIONAL EDUCATION:

University of North Carolina ~ Chapel Hill, NC 1995
Bachelor of Arts in Biology

University of North Carolina ~ Chapel Hill, NC 1996
Master of Accounting

BUSINESS AND PROFESSIONAL BACKGROUND:

Opus Financial Advisors, Inc. ~ Statesville, NC
Financial Consultants, Investment Advisor Representative
Investment Advisor Representative, 2016 to Present
Vice President and Chief Compliance Officer, 2019 to Present

FSC Securities Corporation ~ Atlanta, GA
Broker/Dealer
Registered Representative and Registered Principal, 2016 to Present

IBM ~ Research Triangle Park, NC
Finance and Accounting Manager, 1996 to 2009
License and Registrations:

Janna M. Deegan is licensed to sell securities and holds the following securities licenses:
CRD #6574277

| | |
|--|------|
| FINRA Series 7 (General Securities Representative) ~ | 2015 |
| FINRA Series 24 (General Securities Principal) ~ | 2016 |
| FINRA Series 66 in NC (Uniform Combined State Law/Investment Advisor Rep.) ~ | 2016 |

You can verify these licenses online at: <http://finra.org/brokercheck>

Janna M. Deegan is licensed to sell insurance and holds the following insurance licenses:
NC License #17877157

| | |
|---|------|
| NC Life/Accident/Health Insurance ~ | 2016 |
| NC Variable Life & Variable Annuity ~ | 2017 |
| NC Medicare Supplement/Long Term Care ~ | 2019 |

You can verify these licenses online at: <https://sbs-nc.naic.org/Lion-Web/jsp/sbsreports/AgentLookup.jsp>

Certified Public Accountant ~ North Carolina ~ 1998
License #26213
You can verify this license online at: <http://nccpaboard.gov/welcome/search-the-database/>

**Janna M. Deegan has earned certifications and credentials that are required to be explained in further detail. Please refer to the explanations for each designation listed at the end of this document.*

NICOLE JUNE ROBERTSON

YEAR OF BIRTH: 1981

BUSINESS AND PROFESSIONAL BACKGROUND:

Opus Financial Advisors, Inc. ~ Statesville, NC

Financial Consultants, Investment Advisor Representative

Vice President, 2018 to 2019

Senior Vice President, 2019 to Present

FSC Securities Corporation ~ Atlanta, GA

Broker/Dealer

Registered Representative, 2018 to Present

SunTrust Investment Services, Inc. ~ Chapel Hill and Pittsboro, NC

Broker/Dealer

Registered Representative, 2008 to 2018

Wachovia Securities, LLC ~ Chapel Hill, NC

Broker/Dealer

Registered Presentative, 2006 to 2008

Wachovia Bank, NA ~ Chapel Hill, NC

Bank

Financial Specialist, 2005 to 2008

License and Registrations:

Nicole J. Robertson is licensed to sell securities and holds the following securities licenses:

CRD #5148573

FINRA Series 6 (Investment Representative) ~ 2006

FINRA Series 63 (Uniform Securities Agent State Law) ~ 2006

FINRA Series 7 (General Securities Representative) ~ 2008

FINRA Series 66 in NC (Uniform Combined State Law/Investment Adviser Rep.) ~ 2009

FINRA Series 26 (Investment Company Products/Variable Contracts Principal) ~ 2008

You can verify these licenses online at: <http://finra.org/brokercheck>

Nicole J. Robertson is licensed to sell insurance and holds the following insurance licenses:

NC License #0008930612

NC Life/Accident/Health Insurance ~ 2006

NC Variable Life & Variable Annuity ~ 2008

NC Medicare Supplement Long-Term Care ~ 2017

You can verify these licenses online at: <https://sbs-nc.naic.org/Lion-Web/jsp/sbsreports/AgentLookup.jsp>

MARTIN A. FROST

YEAR OF BIRTH: 1981

PROFESSIONAL EDUCATION:

Niagara University ~ Lewiston, NY
Bachelor of Science in Commerce

2005

BUSINESS AND PROFESSIONAL BACKGROUND:

Opus Financial Advisors, Inc. ~ Statesville, NC
Financial Consultants, Investment Advisor Representative
Vice President, 2018 to 2019
Vice President and Senior Investment Analyst, 2019 to Present

FSC Securities Corporation ~ Atlanta, GA
Broker/Dealer
Registered Representative, 2018 to Present

SunTrust Investment Services ~ Chapel Hill and Pittsboro, NC
Broker/Dealer
Registered Presentative, 2015 to 2018

SunTrust Bank ~ Chapel Hill and Pittsboro, NC
Bank
Premier Banker, 2005 to 2018

License and Registrations:

Martin A. Frost is licensed to sell securities and holds the following securities licenses:
CRD #5785818

FINRA Series 6 (Investment Company Products/Variable Contract Representative) ~ 2010
FINRA Series 63 (Uniform Securities Agent State Law) ~ 2010
FINRA Series 65 in NC (Uniform Investment Adviser Law) ~ 2016
FINRA Series 7 (General Securities Representative) ~ 2018

You can verify these licenses online at: <http://finra.org/brokercheck>

Martin A. Frost is licensed to sell insurance and holds the following insurance licenses:
NC License #9694398

NC Life/Accident/Health Insurance ~ 2007
NC Variable Life & Variable Annuity ~ 2010
NC Medicare Supplement/Long Term Care ~ 2017

You can verify these licenses online at: <https://sbs-nc.naic.org/Lion-Web/jsp/sbsreports/AgentLookup.jsp>

Additional Information Required for Designations

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Consumers can check a Certificant's status online at: <http://www.cfp.net/search/>

The Chartered Retirement Planning CounselorSM, or CRPC®, are individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. 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.

Consumers can check a Chartered Retirement Planning CounselorSM status online at: <http://cffpdesignations.com/Designee>

The Certified Public Accountant, CPA, was established by Chapter 93-12 of the North Carolina General Statutes, the North Carolina State Board of Certified Public Accountant (CPA) Examiners is an independent, self-funded occupational licensing board that grants certificates of qualification as certified public accountants (CPAs) to those individuals who meet the statutory requirements. The reliance of the public and the business community on sound financial reporting and advice on business affairs imposes on the accounting profession an obligation to maintain a high standard of technical competence, morality, and integrity. To this end, the Board enforces the rules of professional ethics and conduct to be observed by CPAs in this State.

Further information can be located on their website and the status of a CPA can be found at: <http://nccpaboard.gov/consumers/>
