



# Firm Brochure

Part 2A of Form ADV

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

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

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

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Effective Date: 03.30.18

## Item 2: Material Changes

### **Annual Update**

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

### **Material Changes since the Last Update**

Since the last filing of this brochure on March 12, 2015, the following have been updated:

1. Revised 3/28/2018
  - a. Updated the amount of client assets under management
2. Revised 3/28/2018
  - a. David Hicks' share of ownership in Oakmont Advisory Group, LLC is 25%.

### **Full Brochure Available**

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

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## Item 4: Advisory Business

### **Firm Description**

Oakmont Advisory Group, LLC (“Advisor”), formerly known as Hicks Advisory Group, LLC was founded in 2011. Ralph Hicks’ share of ownership is 75% and David Hicks’ share of ownership is 25%.

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

Advisor is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, or other commissioned products. The president of Advisor has an affiliated business, Oakmont Insurance, LLC, that does sell insurance products.

Advisor does not act as a custodian of client assets.

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

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

### **Types of Advisory Services**

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

#### ASSET MANAGEMENT

Advisor offers non-discretionary direct asset management services to advisory clients. Advisor will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, Advisor will obtain prior client approval before executing any transactions. Advisor will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, assets allocation, portfolio monitoring and the overall investment program will be based on the above factors.

#### FINANCIAL PLANNING AND CONSULTING

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

#### SOLICITOR FEES

Advisor utilizes the services of Third Party Money Managers to manage client accounts. In such circumstances, Advisor receives solicitor fees from the Third Party Manager. This is detailed in Item 10 of this brochure.

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

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

## Wrap Fee Programs

Advisor does not participate in wrap fee programs.

## Client Assets Under Management

As of December 31, 2017, Advisor had approximately \$53,115,848 in client assets under advisement.

## Item 5: Fees and Compensation

### Method of Compensation and Fee Schedule

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

### ASSET MANAGEMENT

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

Assets Under Management	Maximum Annual Fee	Quarterly Fee
Up to \$100,000	1.75%	.437%
\$100,001 - \$250,000	1.50%	.375%
\$250,001 - \$500,000	1.25%	.312%
\$500,001 - \$1,000,000	1.00%	.250%
Over \$1,000,001	negotiable	negotiable

The annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of each quarter. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in a provided fee invoice as fees are withdrawn. The fees must be paid within ten (10) days following the conclusion of the calendar quarter which the account is being billed for. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. Advisor will be entitled to a pro rata fee for the days service was provided in the final quarter.

### FINANCIAL PLANNING and CONSULTING

Financial Planning Services are offered based on a negotiable fixed fee between \$250 and \$1500, based on complexity and unique client needs. Prior to the planning process the client will be provided the plan fee. The payments are received in two installments; the first half will be due upon commencement of the plan, with the balance due upon delivery of completed financial plan. Client may cancel within five (5) business days of signing agreement for a full refund. If client cancels after five (5) business days, either client will be entitled to a pro-rata refund, or Advisor will be entitled to a final payment based on percentage of work completed; whichever is applicable.

### SOLICITOR FEES

Advisor may at times use the services of third party money managers and receive a solicitor fee for soliciting clients. This relationship will be memorialized in each contract between Advisor and each third-party advisor. The notice of termination and payment of fees for third-party investment advisors will depend on the specific third-party advisor selected. This is detailed in Item 10 of this brochure.

### Client Payment of Fees

Investment management fees are billed quarterly in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected within ten (10) days following the conclusion of the calendar quarter which the account is being billed for. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery.

**Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations).

Advisor, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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

**Prepayment of Client Fees**

Fees for financial plans are billed 50% in advance.

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

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

## Item 6: Performance-Based Fees

**Sharing of Capital Gains**

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

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

## Item 7: Types of Clients

**Description**

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

Client relationships vary in scope and length of service.

**Account Minimums**

Advisor does not require a minimum to open an account, but some third party money managers may have minimums which would be disclosed in the documents provided by the third party money manager.

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

**Methods of Analysis**

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

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

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

### **Investment Strategy**

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

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

### **Security Specific Material Risks**

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

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

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9: Disciplinary Information**

### **Criminal or Civil Actions**

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

### **Administrative Enforcement Proceedings**

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

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

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

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

### **Broker-Dealer or Representative Registration**

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

### **Futures or Commodity Registration**

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

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

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

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

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

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

Advisor may at times utilize the services of Third Party Money Managers to manage client accounts. In such circumstances, Advisor will share in the Third Party asset management fee. This situation creates a conflict of interest. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of Advisor. The fees charged by the Third Party Money Managers do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services will be based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule will be attached to Exhibit D in Advisor's Investment Advisory Agreement.

### **SOLICITOR FEES**

Advisor has entered into a Solicitor Agreements with Gradient Investments, LLC ("GI"), FormulaFolio Investments, LLC ("FFI"), Hanlon Investment Management, Inc. ("Hanlon") and CLS Investments, LLC ("CLS"). GI, FFI, Hanlon and CLS are Registered Investment Advisors that provide investment portfolio advice and supervisory services.

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

Advisor does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial Advisor's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including Form ADV Part 2 disclosures.

**Gradient Investments, LLC ("GI") – Firm CRD #141726**

GI offers an actively managed program of mutual fund and stock portfolios. GI's minimum account value required is \$50,000. The fee will be disclosed to the client in the Investment Advisory Agreement and are negotiable. The clients fee for these services will be based on a percentage of assets under management as follows:

<b>Fee Schedule for:</b> Gradient 50 – Gradient 33 – Covered Call - Controlled Volatility – Gradient Tactical Rotation			
Assets Valuation	Total Fee	GI Retention	Advisor Retention
\$100,000-\$1,000,000	2.00%	1.00%	1.00%
Next \$1,000,000	1.65%	.80%	.85%
Next \$1,000,000	1.20%	.60%	.60%
Over \$3,000,000	.95%	.45%	.50%

<b>Fee Schedule For:</b> ETF Endowment Series – Laddered Income - Fixed Income – Absolute Yield - Precious Metals			
Assets Valuation	Annual Fee	GI Retention	Advisor Retention
\$50,000-\$1,000,000	1.70%	.70%	1.00%
Next \$1,000,000	1.35%	.60%	.75%
Next \$1,000,000	1.00%	.50%	.50%
Over \$3,000,000	.80%	.40%	.40%

<b>Fee Schedule for:</b> Non-Discretionary/Non-Managed Accounts*			
Assets Valuation	Annual Fee	GI Retention	Advisor Retention
All non-managed assets	.60%	.30%	.30%

\*The minimum quarterly fee billed will be \$25

**FormulaFolio Investments, LLC ("FFI") – Firm SEC #801-72780**

FFI offers asset management services on a discretionary basis and allocates clients' assets among different tactical asset allocation strategies as a wrap program described in detail in their Appendix 1. FFI's generally imposes a minimum account of \$50,000. The fee will be disclosed to the client in the Investment Advisory Agreement and are negotiable. The clients fee for these services will be based on a percentage of assets under management as follows:

<b>Fee Schedule for:</b> Tactical and Multi-Manager Allocation Series		
Amount Under Management	FFI Management Fee	Advisor Fee
First: <\$100,000	.80%	1.00%
Next \$100,000 - \$249,999	.75%	1.00%
Next \$250,000 - \$499,999	.70%	1.00%
Next \$500,000 - \$999,999	.65%	1.00%
Next >\$1,000,000	.60%	1.00%

<b>Fee Schedule for:</b> Tactical and Complete Allocation Series		
Amount Under Management	FFI Management Fee	Advisor Fee
First: <\$100,000	.75%	1.00%
Next \$100,000 - \$249,999	.70%	1.00%
Next \$250,000 - \$499,999	.65%	1.00%
Next \$500,000 - \$999,999	.60%	1.00%

Next >\$1,000,000	.55%	1.00%
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Fee Schedule for: Multi-Manager Allocation Series		
Amount Under Management	FFI Management Fee	Advisor Fee
First:<\$250,000	.95%	1.00%
Next \$250,001 - \$500,000	.90%	1.00%
Next \$500,001 - \$1,00,000	.85%	1.00%
Next \$1,00,001 - \$2,000,000	.75	1.00%
Next >\$2,000,001	Contact FFI	1.00%

*Hanlon Investment Management, Inc. ("Hanlon") SEC #801-60889*

Advisor utilizes the "Hanlon Wealth Management Process" which is a tactical and strategic asset allocation process that provides "core portfolio" investment management for clients. The fee will be disclosed to the client in the Investment Advisory Agreement and are negotiable. The client's fee for these services will be based on a percentage of assets under management as follows:

Portfolio Value	Annual Fee	Hanlon Retention	Advisor Retention
Up to \$499,999	2.20%	1.10%	1.10%
Next \$500,000	1.70%	0.85%	0.85%
Above \$999,999	1.20%	0.60%	0.60%

*CLS Investments, LLC ("CLS") – Firm CRD #107975*

Advisor solicits potential client to CLS for discretionary investment management services. The fee will be disclosed to the client in the Investment Advisory Agreement and are negotiable. The clients fee for these services will be based on a percentage of assets under management as follows:

Portfolio Value	Annual Fee	CLS Retention	Advisor Retention
Up to \$499,999	2.20%	1.10%	.60%
Next \$500,000	1.70%	0.85%	0.85%
Above \$999,999	1.20%	0.60%	0.60%

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

### Code of Ethics Description

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **Item 12: Brokerage Practices**

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

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

- *Directed Brokerage*  
In circumstances where a client directs Advisor to use a certain broker-dealer, Advisor still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: Advisor's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients and conflicts of interest arising from brokerage firm referrals.

- **Best Execution**  
Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. Advisor does not exercise discretion over client accounts.
- **Soft Dollar Arrangements**  
Advisor utilizes the services of custodial broker dealers. Economic benefits are received by Advisor which would not be received if Advisor did not give investment advice to clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to Advisor's accounts, ability to conduct "block" client trades, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees directly deducted from client accounts.

A conflict of interest exists when Advisor receives soft dollars. This conflict is mitigated by the fact that Mr. Hicks has a fiduciary responsibility to act in the best interest of his clients and the services received are beneficial to all clients.

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

Advisor is not authorized to aggregate purchases and sales and other transactions.

## **Item 13: Review of Accounts**

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

Account reviews are performed quarterly by Ralph Hicks. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client.

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

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

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

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

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

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

Advisor receives a portion of the annual management fees collected by the Third-Party Money Managers to whom Advisor refers clients.

This situation creates a conflict of interest because Advisor and/or its Investment Advisor Representative have an incentive to decide what Third Party Money Managers to use because of the higher solicitor fees to be received by Advisor. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of Advisor.

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

Advisor does not compensate for client referrals.

## Item 15: Custody

### **Account Statements**

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

Advisor is deemed to have constructive custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of Advisor.

## Item 16: Investment Discretion

### **Discretionary Authority for Trading**

Advisor accepts non-discretionary authority to manage securities accounts on behalf of clients. Advisor will obtain prior client approval before executing any transactions.

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

## Item 17: Voting Client Securities

### **Proxy Votes**

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

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

## Item 18: Financial Information

### **Balance Sheet**

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

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

Advisor has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

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

## **Item 19: Requirements for State Registered Advisors**

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

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

None to report

# Supervised Person Brochure

Part 2B of Form ADV

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

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

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## **Ralph Hicks, ChFC®, CLU®**

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FAX: 505-312-7533

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<https://oakmontadvisory.com>

CRD# 1500855

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

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**Principal Executive Officers and Management Persons****Ralph Hicks, ChFC®, CLU®**

- Year of birth: 1942

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**Educational Background and Business Experience**

## Educational Background:

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

## Business Experience:

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

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**Professional Certifications**

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

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

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

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

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

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**Disciplinary Information**

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

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**Other Business Activities**

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

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

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**Additional Compensation**

Managing Member Ralph Hicks received additional compensation for the sale of insurance, but he does not receive any performance-based fees.

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**Supervision**

Ralph W. Hicks is the, is the sole owner. He is responsible for all supervision. He will adhere to the policies and procedures described in the firm's Compliance Manual.

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**Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding:

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

Bankruptcy Petition: None

# Supervised Person Brochure

Part 2B of Form ADV

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

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

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## David B. Hicks

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FAX: 505-312-7533  
EMAIL: [david@oakmontadvisory.com](mailto:david@oakmontadvisory.com)  
<https://oakmontadvisory.com>  
CRD# 6156912

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

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

- Year of birth: 1979

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**Educational Background and Business Experience**

## Educational Background:

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

## Business Experience:

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

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**Disciplinary Information**

None to report

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**Other Business Activities**

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

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

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**Additional Compensation**

David B. Hicks receives commissions for the insurance products he sells, but does not receive any performance based fees.

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**Supervision**

David B. Hicks is supervised by Ralph W. Hicks, Managing Member. He reviews David's work through frequent office interactions, as well as remote interactions.

Ralph W. Hicks' contact information:

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

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**Requirements for State-Registered Advisors**

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

# Supervised Person Brochure

Part 2B of Form ADV

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

Additional information about David Ryan Gilmore (CRD#6584199) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## David Ryan Gilmore

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CRD# 6184199

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

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**Principal Executive Officers and Management Persons**

**David Ryan Gilmore**

- Year of birth: 1982

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**Educational Background and Business Experience**

Educational Background:

- Bachelor's Political Science, University of New Mexico – 2006

Business Experience:

- Oakmont Advisory Group, LLC; Investment Advisor Representative; 06/2014 – Present
- Oakmont Insurance, LLC; Investment Advisor; 06/2014 – Present
- Albuquerque Public Schools; Educator; 08/2008 – 06/2014
- Dynamic Communications, Inc.; Warehouse Manager; 01/2004 – 08/2008

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**Disciplinary Information**

None to report

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**Other Business Activities**

David Ryan Gilmore is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Oakmont Advisory Group, LLC always acts in the best interest of the client, including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Oakmont Advisory group, LLC in their capacity as a licensed insurance agent.

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**Additional Compensation**

David Ryan Gilmore does not receive any economic benefit from any person, company, or organization, other than Oakmont Advisory Group, LLC in exchange for providing clients advisory services through Oakmont Advisory Group, LLC.

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**Supervision**

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