OFG Financial Services, Inc.

120 SE 6th Ave., Townsite #2, Suite 105
Topeka, KS 66603

Compliance Contact: Todd Payne

Website: www.ofgfinancial.com

March 20, 2020

This brochure provides information about the qualifications and business practices of OFG Financial Services, Inc, a Registered Investment Adviser. If you have any questions about the contents of this brochure, please contact us at (785) 233-4071 or todapayne@ofafinancial.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 OFG Financial Services, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

The term "Registered Investment Adviser" is not intended to imply a certain level of skill or training.

Item 2 Material Changes

This update for OFG Financial Services, Inc., a Registered Investment Adviser, does not contain any material changes from the update of ADV Part 2 on August 12, 2019.

Item 3

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Item 4 Advisory Business

- A. OFG Financial Services, Inc., a Registered Investment Adviser (hereinafter "OFG"), became licensed as a Registered Investment Adviser in November 2002. OFG is a state-registered Investment Adviser in Kansas, Oklahoma, Texas, Arizona and Missouri and has no subsidiaries. J. Kenneth Ogdon is the sole owner of OFG, and Todd Payne is the Chief Compliance Officer.
- B. OFG offers the following advisory services, where appropriate, to advisory clients.

PORTFOLIO MANAGEMENT:

OFG provides continuous and regular supervisory and management services to clients, provided through the following platforms:

- Orion, formerly FTJ FundChoice
- Pentegra Retirement Services
- RBC Capital Markets, LLC Management Platform
- Security Benefit Management Platform
- Assetmark, Inc.
- SEI

Investment Management Services are defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. OFG and the client develop a client's personal investment policy through discussions on investment goals and objectives. The development of a client's investment policy can also be aided by using a Strategist option through one of the above platforms. OFG and the client then create and manage a portfolio based on the client's policy. Most portfolios under OFG management contain mainly no-load mutual funds, but a portfolio could also include one or more of the following: exchange-listed securities, securities traded over-the-counter, foreign issuers, corporate debt securities, commercial paper, certificates of deposit, municipal securities, variable annuities, no-load mutual funds, load-waived mutual funds, front-load mutual funds, and United States government securities.

FINANCIAL PLANNING AND CONSULTING:

OFG provides advice in the form of a financial plan. Clients purchasing this service will receive a written financial plan. OFG provides the client with a detailed financial plan designed to achieve their stated financial goals and objectives.

Item 4 Advisory Business (Cont.)

In general, the financial plan may address any or all of the following areas of concern:

<u>PERSONAL</u>: Family records, budgeting, personal liability, estate information and financial goals.

<u>TAX & CASH FLOW</u>: Income tax and spending analysis and planning for past, current and future years. OFG will illustrate the impact of various investments on a client's current income tax and future tax liability.

<u>DEATH AND DISABILITY</u>: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.

<u>RETIREMENT</u>: Analysis of current strategies and investment plans to help the client achieve their retirement goals.

<u>INVESTMENTS</u>: Analysis of investment alternatives and their effect on a client's portfolio.

OFG gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk.

Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, OFG suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

Clients can also receive investment advice on a more limited basis. This may include advice on only an isolated area of concern such as estate planning, retirement planning or other specific topics. OFG also provides specific consultation regarding general investment and financial concerns of the client. Financial plan recommendations are not limited to any specific product or service.

TIMING AND MANAGEMENT SERVICES:

Clients can receive timing and management services from several third-party investment advisers with which OFG is contracted. These third-party investment advisers are:

Clarke Lanzen Skalla ("CLS") Investment Firm, LLC Morningstar Associates, LLC

Item 4 Advisory Business (Cont.)

C. OFG and clients allocate the client's assets among various investments taking into consideration the overall management style selected by the client. The investments will be selected on the basis of any or all of the following criteria: the investment performance history; the industry sector; the record of management; the investment objectives; and the fee structure. Portfolio weighting between investments and market sectors will be determined by each client's individual needs and circumstances.

Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

- D. OFG does not participate in wrap fee programs.
- E. OFG manages advisory accounts on a non-discretionary basis only.

Item 5 Fees & Compensation

A. ADVISORY FEE SCHEDULE

PORTFOLIO MANAGEMENT:

The annual fee OFG charges for portfolio management services will be charged as a percentage of assets under management, typically a flat fee of 1% annually. Annual fees could also be charged in accordance with a breakpoint schedule, such as the fees outlined in the below model:

Assets Under Management	Annual Fee (%)	
\$0 to \$250,000	0.90%	
\$250,001 to \$500,000	0.85%	
\$500,001 to \$750,000	0.80%	
\$750,001 to \$1,000,000	0.75%	
\$1,000,001 to \$5,000,000	0.70%	
Over \$5,000,000	0.65%	

This schedule is used as only an example; actual fees could differ from what is on this schedule. An individual client's fees will be outlined on their individual account opening forms along with the Investment Management Agreement with OFG. These fees may be deducted automatically from the client's account or invoiced and paid on a monthly or quarterly basis. If invoiced, clients will be invoiced at the beginning of each calendar month/quarter based upon the value (market value or fair market value in the absence of market value plus any credit balance or minus any debt balance), of the client's account at the end of the previous month/quarter. Fee schedules are subject to change based on discussions between the OFG Representative and the client.

FINANCIAL PLANNING AND CONSULTING:

Financial planning and consulting fees will be charged on an hourly basis, ranging from \$50 to \$500 per hour, depending on the nature and complexity of each client's circumstances. Under certain circumstances the hourly fee may be negotiable. An estimate for total hours may be determined at the start of the advisory relationship. OFG may discount or waive, depending on the account size, the financial planning fee if the client is also participating in OFG's portfolio management service. Typically, the financial plan or consulting service will be presented to the client within 30 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the client.

GENERAL INFORMATION ON FEES AND SERVICES

Under certain circumstances, all OFG advisory fees may be negotiable.

The fee charged is calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the investments or any portion of the investments of an advisory client (SEC Rule 205(a)(1)).

Item 5 Fees & Compensation (Cont.)

- B. OFG typically has fees automatically deducted from client accounts held at its management platforms. Fees are deducted and remitted to OFG by the management platforms as administrators. OFG can deduct advisory fees from a client account (without OFG being deemed to have 'custody') if the following conditions are met:
 - 1. The management platform company or OFG sends a quarterly or monthly statement to the client showing the amount of the fee, the value of the client's assets upon which the fee was based, and the specific manner in which the fee was calculated.
 - 2. The management platform company or OFG discloses to the client that it is the client's responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is properly calculated.
 - 3. OFG sends a bill to the custodian indicating only the amount of the fee to be paid by the custodian.
 - 4. The client authorizes OFG in writing to receive fee payments directly from the client's account being held by an independent custodian.
 - 5. The independent custodian agrees to send the client, at least quarterly, a statement indicating all amounts disbursed from the account.

A client may choose to pay the fee directly to OFG.

C. All fees paid to OFG for investment advisory services are separate and distinct from the fees and expenses charged by timing services and mutual fund and variable annuities to their shareholders. These fees and expenses are described in each investment company's prospectus. These fees will generally include a management fee, other investment company expenses, and a possible distribution fee. If the investment company also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in an investment company product directly, without the services of OFG. In that case, the client would not receive the services provided by OFG. These services by OFG are designed, among other things, to assist the client in determining which investment company product or products are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the investment companies and the fees charged by OFG to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Refer to Item 12 for a discussion of brokerage.

Item 5 Fees & Compensation (Cont.)

- D. OFG clients do not pay fees in advance of services performed for clients. Either party can cancel a client agreement at any time for any reason upon receipt of written notice. Upon termination of any account, any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.
- E. OFG's Registered Investment Adviser does not receive commissions for the sale of securities or other products on advisory accounts.

If an OFG advisory client executes recommended securities transactions through associated persons of OFG in their separate capacities as Registered Representatives of OFG Financial Services, Inc.'s broker-dealer (hereinafter "OFG's Broker-Dealer"), these individuals will earn commissions which are separate and distinct from fees charged for advisory services. In some instances, depending on the size of the transaction, advisory fees will be discounted, at OFG's discretion, for commissions earned. Commissions will not be credited towards future advisory fees.

Associated persons of OFG may, from time to time, receive 12b-1 distribution fees from investment companies in connection with the placement of client funds into investment companies and/or other securities brokerage commissions from implementing securities transactions on behalf of advisory clients.

- 1. A conflict of interest could occur in client accounts when associated persons of OFG in their separate capacities as Registered Representatives of OFG's Broker-Dealer process transactions through OFG's Broker-Dealer. While these individuals endeavor at all times to put the interest of the clients first as part of OFG's fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest and may affect the judgment of these individuals when making recommendations. OFG will notify the client if a transaction will be processed in a separate capacity as a Registered Representative of OFG's Broker-Dealer which would generate a conflict. OFG recommends investments in several types of securities. When mutual funds are used, OFG would recommend no-load funds.
- 2. When OFG recommends investment products, clients may purchase those investments through other brokers or agents not affiliated with OFG.
- 3. OFG does not receive revenue from advisory clients through commissions other than through OFG's Broker-Dealer as explained above in Item 5E.
- 4. OFG does not charge advisory fees in addition to commissions or markups, and commissions would only be received through OFG's Broker-Dealer as explained above in Item 5E.

Item 6 Performance-Based Fee & Side-By-Side Management

OFG does not accept performance-based fees.

Item 7 Types of Clients

OFG provides investment advisory services for individuals and corporations. OFG does not have a required minimum account size to open an account.

Item 8 Method of Analysis, Investment Strategies and Risk of Loss

- A. Fundamental analysis is used to determine the investments for each client. Long-term investments and short-term investments are recommended depending on the needs of the client. Each client is informed that investments in securities involve risk of loss. Clients should be prepared to bear a loss.
- B. Fundamental analysis is used after obtaining detailed information from the client. Client investment objectives determine the anticipated length of time an investment is held. Market conditions and client circumstances may change. This could require an investment be sold before the original plan. OFG does not recommend frequent trading in client accounts. Frequent trading can affect investment performance, particularly through increased brokerage and other costs and taxes.
- C. OFG offers advice on exchange-listed securities, over the counter securities, foreign issuers, corporate debt securities, commercial paper, certificates of deposit, municipal securities, variable annuities, mutual fund shares, and United States government securities. Unforeseen circumstances could change investments and thus change the level or risk.

Item 9 Disciplinary Information

OFG and J. Kenneth Ogdon have had no legal or disciplinary actions.

- A. No criminal or civil action in a domestic, foreign or military court of competent jurisdiction has been brought against OFG or J. Kenneth Ogdon.
- B. No administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority has been brought against OFG or J. Kenneth Ogdon.
- C. No proceeding by a self-regulatory organization (SRO) has been brought against OFG or J. Kenneth Ogdon.

Item 10 Other Financial Industry Activities and Affiliations

- A. OFG's Broker-Dealer is registered as a broker-dealer and is a member of FINRA and the SIPC. OFG's three back-office RIA Principals, J. Kenneth Ogdon, Kenneth J. Becker and Todd Payne, are Registered Representatives and Principals of OFG's Broker-Dealer.
- B. OFG is not registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, nor is an associated person of any of these designations.
- C. OFG's Investment Adviser Representatives may spend a significant amount of their time on non-advisory activities. These relationships should not create a material conflict of interest with clients.
 - 1. OFG's Investment Adviser Representatives are Registered Representatives of OFG's Broker-Dealer, a FINRA-registered broker-dealer. As such, these individuals, as Registered Representatives, will be able to effect securities transactions and will receive separate, yet customary, compensation for effecting any securities transactions.
 - 2. OFG's Broker-Dealer has sales agreements in place with several mutual fund companies, whereby Registered Representatives can effect mutual fund transactions and receive a commission for such transactions (see Item 5E1 above in relation to potential conflicts of interest in this area). OFG and OFG's Broker-Dealer have no relationship or arrangement with a unit investment trust, private investment company, hedge fund or offshore fund.
 - 3. OFG has sales agreements in place with other investment advisers functioning as timing and management services companies. OFG functions as the solicitor for these timing and management services companies, whereby OFG effects an investment timing and management services relationship between a client and a timing and management services company, and OFG receives an ongoing portion of the investment management fee for this relationship. Other than the timing and management services arrangements, OFG has no relationship or arrangement with another investment adviser.
 - 4. OFG has no relationship or arrangement with a futures commission merchant, commodity pool operator, or commodity trading advisor.
 - 5. OFG has no relationship or arrangement with a banking or thrift institution.
 - 6. OFG has no relationship or arrangement with an accountant or accounting firm.
 - 7. OFG has no relationship or arrangement with a lawyer or law firm.

Item 10 Other Financial Industry Activities and Affiliations (Cont.)

8. OFG's Broker-Dealer has sales agreements in place with several insurance carriers, whereby Registered Representatives can transact annuity transactions and receive a commission for such transactions (see Item 5E1 above in relation to potential conflicts of interest in this area). Individual Investment Adviser Representatives also may function as licensed insurance agents for various insurance carriers. As such, Investment Adviser Representatives will be able to receive separate, yet customary, commission compensation resulting from implementing insurance product transactions on behalf of advisory clients.

OFG has an affiliated company, OFG Planning Services, Inc. The primary business activities of OFG Planning Services, Inc. are life insurance and Section 125 insurance products.

- 9. OFG has no relationship or arrangement with a pension consultant.
- 10. OFG has no relationship or arrangement with a real estate broker or dealer.
- 11. OFG has no relationship or arrangement with a sponsor or syndicator of limited partnership.
- D. OFG may recommend another investment adviser, as OFG has sales agreements in place with several timing and management companies. OFG functions as the solicitor for these timing and management companies, whereby OFG effects an investment timing and management relationship between the client and the timing and management company, and OFG receives an ongoing portion of the investment management fee for this relationship. Other than the timing and management services arrangements, OFG has no relationship or arrangement with another investment adviser.

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

- A. OFG is not an SEC-registered adviser. OFG shall observe high standards of commercial honor and just and equitable principles of trade in conduct of each client's business. An investment adviser or investment adviser representative is a fiduciary and shall act primarily for the benefit of its client.
- B. OFG or individuals associated with OFG may buy or sell securities identical to, or different from those recommended to clients for their personal accounts. In addition, any related person(s) may have an interest or position in certain securities which may also be recommended to a client. The interest of the client's investments is always considered before any interest of buying or selling securities for any individuals associated with OFG.
- C. It is the expressed policy of OFG that no person employed by OFG may purchase or sell any security prior to a transaction being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.
- D. As situations represent a conflict of interest, OFG has established the following restrictions in order to ensure its fiduciary responsibilities:
 - The Owner and/or employees of OFG shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of OFG shall prefer his or her own interest to that of the advisory client.
 - All clients are fully informed that certain individuals may receive separate compensation when effecting securities and/or insurance transactions on behalf of advisory clients.
 - OFG emphasizes the unrestricted right of the client to decline to implement any advice rendered.
 - OFG requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
 - Any individual not in observance of the above may be subject to termination.

Item 12 Brokerage Practices

- A. When OFG requests clients direct transactions to OFG's Broker-Dealer or its clearing broker, RBC Capital Markets, LLC (hereinafter "RBC"), the factors considered by OFG are the broker-dealers' ability to provide professional services, the broker-dealers' reputation, and the broker-dealers' quality of execution services and costs of such services, among other factors.
 - 1. <u>Research and Other Soft Dollar Benefits</u> OFG does not receive any soft dollars from OFG's Broker-Dealer or RBC or any third party.
 - a. OFG does not receive any soft dollars from research or services for its benefit.
 - b. OFG does not receive any soft dollars for recommending a broker-dealer.
 - c. OFG does not receive any soft dollars due to commissions charged by a broker-dealer.
 - d. OFG does not receive soft dollars for any client accounts.
 - e. OFG does not receive products or services from OFG's Broker-Dealer or RBC acquired with client brokerage commissions. OFG may receive incidental benefits from OFG's Broker-Dealer and RBC. These benefits include: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk serving OFG's Broker-Dealer or RBC; ability to have investment advisory fees deducted directly from client account; access to an electronic communication network for client order entry and account information; receipt of compliance publications; and access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors.
 - f. OFG does not direct client transactions to a particular broker-dealer for soft dollars.
 - 2. <u>Brokerage for Client Referrals</u> OFG does not receive client referrals from a broker-dealer or third party.
 - a. OFG does not receive client referrals for recommending a particular broker-dealer.
 - Since OFG does not direct client transactions to a particular broker-dealer in return for client referrals, supervisory procedures are not needed for this activity.

3. <u>Directed Brokerage</u>

a. PORTFOLIO MANAGEMENT:

As OFG does not have the discretion to choose the broker-dealer or the commission rates to be paid, clients must direct the use of a particular broker-dealer for all trades.

Item 12 Brokerage Practices (Cont.)

OFG requests that clients direct OFG to place all trades through OFG's Broker-Dealer, which clears its transactions through RBC.

OFG's clients should evaluate OFG's Broker-Dealer and RBC independently before opening an account. OFG believes that OFG's Broker-Dealer and RBC will be able to provide its clients with competitive brokerage services and prices. Not all advisers require clients to a direct a brokerage.

FINANCIAL PLANNING AND CONSULTING:

OFG's financial planning clients must choose their own broker-dealers and/or insurance companies through which to implement financial planning and consulting recommendations. Implementation of recommendations is entirely at the client's discretion. When consistent with its fiduciary duty, OFG will recommend the use of OFG's Broker-Dealer or RBC. Clients must evaluate OFG's Broker-Dealer, RBC, and/or insurance companies independently before opening an account or using any brokerage/insurance services. OFG believes that OFG's Broker-Dealer and RBC will be able to provide its clients with competitive brokerage services and prices. The factors considered by OFG to this end are the broker-dealers' ability to provide professional services, the broker-dealers' reputation, and the broker-dealers' quality of execution services and costs of such services, among other factors. Financial planning and consulting clients may use any broker-dealer of their choice.

TIMING AND MANAGEMENT SERVICES:

OFG's timing and management services clients will receive the execution implemented by the investment manager, and OFG's broker-dealer will not be involved in these transactions.

b. Associated persons of OFG are also Registered Representatives of OFG's Broker-Dealer. OFG's Broker-Dealer is required to supervise the securities trading activities of its Representatives. Clients may request the brokerage transactions be directed to a particular broker-dealer other than OFG's Broker-Dealer or RBC. However, if OFG's Broker-Dealer believes that the use of that other broker-dealer would hinder OFG's Broker-Dealer in meeting its supervisory obligations, OFG will not be able to accept the account.

OFG reserves the right to decline acceptance of any client account that directs the use of a broker-dealer other than OFG's Broker-Dealer or RBC.

Item 12 Brokerage Practices (Cont.)

As associated persons of OFG are Registered Representatives of OFG's Broker-Dealer, these individuals will be able to receive separate, yet customary, compensation for implementation of securities transactions on behalf of advisory clients. Any commissions or other compensation received from the implementation of advisory recommendations is separate and distinct from OFG's advisory fees. Clients should be aware that best execution and lower commissions may not necessarily be achieved if recommended transactions are placed through these individuals, in their separate capacities as Registered Representatives of OFG's Broker-Dealer.

In directing the use of a particular broker-dealer, it should be understood that OFG will not have authority to negotiate commissions or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to other clients.

B. OFG is not able to aggregate purchases and sales of securities. Individual client accounts may not receive the most favorable order of execution due to this practice. Since OFG does not handle any discretionary accounts, aggregating trades is not possible. Clients may pay a higher transaction fee when the purchase or sale of a security is not aggregated.

Item 13 Review of Accounts

A. PORTFOLIO MANAGEMENT:

Initial and ongoing transaction review on client transactions and account balances for investment management accounts are the responsibility of the OFG Investment Adviser Representative assigned to the account. This review is conducted at least quarterly. OFG Principals also conduct transaction review if copies of transaction records are provided to the OFG Home Office. In addition, for an investment management account invoiced by the home office, an OFG Principal will review the account balance and activities at least quarterly in conjunction with the processing of the quarterly fee charged to the client.

FINANCIAL PLANNING AND CONSULTING:

These accounts will be reviewed as contracted for at the inception of the advisory relationship by the Investment Adviser Representative assigned to the account.

TIMING AND MANAGEMENT SERVICES:

Initial and ongoing transaction review on client transactions and account balances for timing and management services accounts are the responsibility of the OFG Investment Adviser Representative assigned to the account. OFG Principals also conduct transaction review if copies of transaction records are provided to the OFG Home Office.

B. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, the market, political or economic environment.

C. PORTFOLIO MANAGEMENT:

Clients will receive written monthly brokerage and custodial statements from their respective broker/custodian. The independent custodian will send the client a monthly statement showing all activity in the account. Clients will receive quarterly performance reports from the OFG Investment Adviser Representative assigned to the account.

FINANCIAL PLANNING AND CONSULTING:

These clients will receive written reports as contracted for at the inception of the advisory relationship.

TIMING AND MANAGEMENT SERVICES:

Clients will receive quarterly statements from their respective timing and management services company.

Item 14 Client Referrals and Other Compensation

A.	OFG and its Representatives do not receive any economic benefit for providing investment
	advice or other advisory services to clients other than client fees.

B. OFG and its Representatives do not compensate any person for client referrals.

Item 15 Custody

OFG does not have custody of client funds or securities. RBC Capital Markets Corporation serves as the independent custodian for client accounts established with OFG's Broker-Dealer.

RBC Capital Markets Corporation sends monthly account statements directly to clients. Clients should carefully review these statements. Timing and management services clients receive quarterly statements from their respective timing and management services company showing the value of their investment account at the end of the quarter. Clients should review these statements for accuracy.

Item 16 Investment Discretion

OFG does not accept discretionary authority to manage securities accounts on behalf of clients.

Item 17 Voting Client Securities

- A. OFG does not vote proxies for client securities.
- B. Clients retain the authority and responsibility for voting proxies. OFG is expressly precluded from rendering any advice or taking any action with respect to, the voting of such proxies. Clients receive proxy solicitations directly from the custodian. Clients may contact OFG if they need assistance in understanding the proxy solicitation information. OFG will not give advice and voting the proxy will be the responsibility of the client.

Item 18 Financial Information

- A. OFG does not require or solicit prepayment of fees.
- B. OFG does not have discretionary authority, custody of client funds or securities, or require or solicit prepayment of client fees. OFG does not have a financial condition that would impair the ability of OFG to meet contractual commitments to clients.
- C. OFG and J. Kenneth Ogdon have not been the subject of any bankruptcy petition at any time.

Item 19 Requirement for State-Registered Advisers

A. **EDUCATION AND BUSINESS STANDARDS**

Advisory persons associated with OFG must possess, minimally, a college degree and/or appropriate business experience and all required licenses.

J. Kenneth Ogdon, Owner

EDUCATION:

BA, Friends University, Wichita, KS	1959
MBS, Emporia St. University, Emporia, KS	1963
Post Graduate Work, University of Denver, Denver, CO	1967

EMPLOYMENT HISTORY:

The Columbian Securities Corporation,	Member NASD/SIPC, Topeka, KS	
Managing Partner		1968-1992

OFG Financial Services, Inc., Member FINRA/SIPC, Topeka, KS	
Owner, President, Director, General Securities Principal,	
General Securities Representative	1992-Present

Kenneth J. Becker

EDUCATION:

Certified Financial Planner	(CFP	20	001	L
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EMPLOYMENT HISTORY:

MetLife, O.N. Equity, Capital Portfolio Management, CoreFirst Bank & Trust,		
Topeka, KS, Registered Representative, Chief Compliance Officer	1998-2008	
Kansas Office of the Securities Commissioner	2008-2018	

OFG Financial Services, Inc., Member FINRA/SIPC, Topeka, KS
Senior Vice President, Director, General Securities Principal,
Municipal Securities Principal, General Securities Representative
2018-Present

Item 19 Requirement for State-Registered Advisers (Cont.)

Todd M. Payne

EDUCATION:

BA Mathematics, University of Kansas, Lawrence, KS	1994
MS, Accounting & Information Systems, University of Kansas, Lawrence, KS	1998
Certified Public Accountant	1999

EMPLOYMENT HISTORY:

General Public Accounting, including: 1998-2005
Arthur Andersen LLP, Denver, CO
Berberich Trahan & Co, Topeka, KS

Brier Payne Meade Insurance, Topeka, KS
Controller, P&C Insurance Agent 2005-2008

OFG Financial Services, Inc., Member FINRA/SIPC, Topeka, KS
Secretary-Treasurer, Chief Compliance Officer, Chief Financial Officer,
Director, General Securities Principal, Municipal Securities Principal,
FINOP, General Securities Representative
2008-Present

- B. OFG's Investment Adviser Representatives may spend a significant amount of their time on non-advisory activities, such as broker-dealer and insurance activities. Refer to Item 10C for a further description on the amount of time spent on this business.
- C. OFG and its associated persons are not compensated for advisory services with performance-based fees.
- D. 1. OFG and its associated persons have not been found liable in an arbitration claim alleging damages.
 - 2. OFG and its associated persons have not been found liable or required to pay an award in a civil, self-regulatory organization or administrative proceeding.
- E. OFG and its associated persons have no relationships with any issuer of securities, and no relationships with any seller of securities other than those disclosed in Item 10C.
- F. OFG has professional liability insurance coverage for its investment advisory activities. Any client or prospective client who requests proof of professional liability insurance coverage shall be provided by OFG a copy of the insurance agreement in effect.

Item 20 Brochure Supplements for OFG Investment Advisor Representatives

See subsequent pages for the Brochure Supplements for OFG's Investment Advisor Representatives ("IAR's").