

## OJM GROUP, LLC

April 5, 2021

### Item 1. Introduction.

OJM Group, LLC is registered with the United States Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers and investing.

### Item 2: What investment services and advice can you provide to me?

OJM Group, LLC provides investment advisory services to retail investors. The principal services we offer are financial planning, consulting, wealth management, and investment management services. We also offer advisory services, including financial planning tools, through our website-based program, Intelligent Portfolios (the "Program"). Through the Program, we provide investment management services through investment models consisting of exchange traded funds. We tailor your investment management services to match the investment objectives, goals, risk parameters, financial and other information which you provide to us. We monitor the holdings and performance of your account on an ongoing basis and provide you with periodic reports regarding the performance and holdings of your account. However, if we provide you financial planning or consulting services only, after delivery of the completed financial plan to you, reviews are conducted on an as needed basis only. We generally provide investment management services on a discretionary basis pursuant to authority granted to us in your client agreement. Discretionary authority authorizes us to determine which securities are bought and sold, the total amount to be bought and sold, and the costs at which transactions will be effected without your prior approval. However, in certain situations we may provide investment management services on a non-discretionary basis, which means you make the ultimate decision to buy or sell an investment. Investment management services through the Program are only offered on a discretionary basis. We do not limit the provision of investment management services or financial planning services to proprietary products. In addition, we generally do not limit the types of investments we utilize for clients, but consistently utilize independent managers, individual equity securities, mutual funds, exchange traded funds, fixed income securities, private funds/illiquid investments and options and other derivative investments. We generally do not impose account minimums for new clients, except participation in the Program, which requires a \$10,000 account minimum. Regardless, we reserve the right to accept or decline a potential client for any reason in our sole discretion.

For additional information, please refer to [OJM's Form ADV Part 2A Brochure](#), and the [Program's Form ADV Part 2A Brochure](#), especially [Item 4 Advisory Business](#), [Item 7 Types of Clients](#), [Item 13 Review of Accounts](#) and [Item 16 Investment Discretion](#).

### Questions to Ask Us:

*Given my financial situation, should I choose an investment advisory service? Why or why not?*

*How will you choose the investments to recommend to me?*

*What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

### Item 3 (part 1): What fees will I pay?

For investment advisory services we charge an asset based fee, which is billed on a quarterly basis. For an asset based fee, the more assets that are in a client's advisory account, the more a client will pay in fees. Therefore, we may have an incentive to encourage clients to increase the assets in his or her account. For wealth management services we typically charge a retainer fee, however, in certain situations we may charge a fixed or hourly fee. For financial planning and consulting services we charge a fixed or hourly fee, which is billed at the beginning of the engagement and at the completion of the engagement.

In addition to our fees you will be responsible for other fees and expenses, such as, transaction charges and fees/expenses charged by any custodian of your account, subadvisor, mutual fund, exchange traded fund, separate account manager and any taxes or fees required by federal or state law.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information, see [Item 5 Fees and Compensation of OJM's Form ADV Part 2A Brochure](#) and the Program's [Form ADV Part 2A Brochure](#).

#### Question to Ask Us:

*Help me to understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

#### **Item 3 (part 2): What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. As an example, we receive various benefits and services from custodians that we may recommend to you. For additional information on how this conflict and others might affect you, please refer to OJM's [Form ADV Part 2A Brochure](#) and the [Program's Form ADV Part 2A Brochure](#), specifically [Item 12 Brokerage Practices](#).

#### Question to Ask Us:

*How might your conflicts of interest affect me, and how will you address them?*

#### **Item 3 (part 3): How do your financial professionals make money?**

Our financial professionals are paid a percentage of the revenue earned by the firm on the client assets managed and/or serviced by the specific financial professional. Since the firm charges an asset-based advisory services fee, the more assets you have in your account the more you will pay in fees and, therefore, the firm and the financial professional have an incentive to encourage you to increase the assets in your account. Certain of our financial professionals also serve as licensed insurance agents and/or registered representatives of unaffiliated broker-dealers. These financial professionals earn commissions and other fees on insurance and other products sold through the unaffiliated broker-dealer. While no commissions are earned by these financial professionals relative to any of our client investment advisory services accounts, this presents a conflict of interest because these financial professionals in their role as a licensed insurance agent or registered representatives for the unaffiliated broker-dealer are incentivized to make recommendations based on the compensation received rather than on a client's needs. For additional information regarding our financial professionals' activities as registered representatives of an unaffiliated broker-dealer or insurance agents please refer to [OJM's Form ADV Part 2A Brochure](#), and the [Program's Form ADV Part 2A Brochure](#), specifically [Item 5 Fees and Compensation](#) and [Item 10 Other Financial Industry Activities and Affiliations](#).

#### **Item 4: Do you or your financial professionals have a legal or disciplinary history?**

Firm—No. Financial professionals—Yes. You can visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

#### Questions to Ask Us:

*As a financial professional, do you have any disciplinary history? For what type of conduct?*

#### **Item 5: Additional Information**

For additional information about our investment advisory services and to request a copy of our Form CRS, please contact 513-791-7525.

#### Questions to Ask Us:

*Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how a person is treating me?*