

1. INTRODUCTION

Oberlin Financial International, LLC (OFI) is broker-dealer registered with the Securities and Exchange Commission ("SEC") and member of Financial Industry Regulatory Authority ("FINRA") and Securities Investors Protection Corporation ("SIPC"). OFI ("we," "our," "us", and the "Firm") is affiliated with Oberlin Wealth Partners, LLC, a registered investment adviser ("OWP"). It is important for you to understand OFI's broker-dealer services and fees.

Free and simple tools are available for you to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers and investing. Prior to opening an account or investing with any firm, we suggest that you review this website as it provides educational materials about broker-dealers, investment advisors, and investing.

2. WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

- ☐ The standard services we provide include buying and selling securities and recommending investments to retail investors are:
 - o Account Types: Non-discretionary, and Cash
 - o Products: Private Placements, Investor Advisor, Variable Life Insurance, Variable Annuities, and Mergers & Acquisitions
- ☐ The firm does not promote proprietary products, it is agnostic to providers as it has an open-end platform (limited to those product providers that we have established a service level agreement). Selection is normally driven by client profile and applicable among others such as investment objectives and risk tolerance levels.
- ☐ **Account Minimums and Other Requirements:** We do not have a minimum requirement for opening an account, however we generally seek to open accounts with assets under management above US\$1,000,000. Jurisdictional constraints are determined by US regulations. Directly held investment and annuity products are subject to the minimum investments outlined in their prospectus.
- ☐ **Account Monitoring:** While we remain available to assist you after effecting a securities transaction for you (including those recommended to you), we are not required to monitor your portfolio or investments on an ongoing basis.
- ☐ **Investment Authority:** We do not exercise discretionary investment authority, which means that we cannot buy or sell investments in your account without first obtaining your consent. We may recommend investments to you, but you are responsible for making the decision whether to purchase or sell investments.
- ☐ **Limited Investment Offerings:** Investment offerings are limited to a specific menu of variable annuity and life insurance products, private placements, and mergers and acquisitions.
- ☐ **Investment Advisory Services:** As an investment adviser, our Investment Advisor Representatives (IARs), ascertain your financial position, investment needs and objectives, investment limitations, and risk tolerance. IARs are financial professionals registered with Oberlin Financial International.

Questions to ask:

1. Given my financial situation, should I choose a brokerage service? Why or why not?
2. How will you choose investments to recommend to me?
3. What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

3. FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT

3A. What Fees Will I Pay?

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.

Broker-Dealer Services

- ☐ If you open a brokerage account, you will pay us a transaction-based fee, generally referred to as a commission," but it may also be called a "sales charge", every time you buy or sell an investment.
- ☐ **SEC Registered Insurance Products:** When you purchase an insurance product like a variable annuity, you will indirectly pay a commission, which is factored into the cost of the insurance and is paid to the firm by the issuing insurance company. The costs of an insurance product include an asset-based charge, usually called a mortality and expense risk charge, administrative charges, and cost of insurance charges (in the case of variable life). In addition, surrender charges can apply to certain withdrawals or surrenders. Optional riders can be added at an additional cost. More information about these insurance commissions and other fees and expenses built into the cost of the insurance is available

Investment Advisory Services

- ☐ The fee may be based on your assets under management ("AUM").
- ☐ Additional fees such as account maintenance fees, and account inactivity fees by your account custodial may occur.
- ☐ The transactions in your account do not affect how an Adviser charges. We therefore have no incentive to encourage you to engage in transactions.
- ☐ Fee schedule details can be seen on the firm's ADV located at (or you may request it): www.adviserinfo.sec.gov

FORM CRS (CUSTOMER RELATIONSHIP SUMMARY)

Summary of fee schedule for the Investment Advisor:	
AUM	Annualized Fee
\$1,000,000+	negotiable

- ☐ You may find further information at: <https://youtu.be/FZNCce1spHQ> (SEC video – Broker or Advisor?)

Questions to ask:

Help me 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?

3B. What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, 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 some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations we provide you. Here are some examples to help you understand what this means:

Because we are paid on a transactional basis, we have an incentive to encourage you to effect more transactions and make additional investments to increase the amount of commissions we earn. Here are additional examples of incentives created by some of the payments received.

- ☐ Proprietary products are investments that are issued, sponsored, or managed by our firm or our affiliates. We do not have proprietary products.
- ☐ We can make extra money by selling you certain investments either because they are managed by someone related to our firm or because they are offered by companies that pay our firm to sell their investments. Your financial professional also receives more money if you buy these investments.

Questions to ask:

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

3C. How do your financial professionals make money?

- ☐ Our representative's compensation derives from their total AUM or commissions generated, depending on type of account. The firm splits the fees or commissions generated according to the individual representative negotiated compensation agreement.
- ☐ Although our representatives do not have sales goals, nor specific product goals, different products charge different commission or fees, always contemporaneous to industry standards. For example, the cost of a Treasury would be relatively lower than the cost of a Structure Product.
- ☐ How brokers or Advisors get paid: <https://youtu.be/talDyeUwsWE> (SEC video – how brokers or advisors get paid)

4. DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

Yes. Visit <http://www.investor.gov/CRS> for a free and simple search tool to research us and our financial professionals. For additional information about our financial professionals, visit FINRA Broker Check <https://brokercheck.finra.org>

Questions to ask:

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

FIND YOUR INVESTMENT ADVISOR REPRESENTATIVE: <https://adviserinfo.sec.gov/>

5. ADDITIONAL INFORMATION

- ☐ You may find additional information about our services at the SEC site: <https://adviserinfo.sec.gov/>
- ☐ You may request a copy of the Form CRS Relationship Summary by contacting your investment professional or <http://www.investor.gov/CRS>. You may also contact us at 419.636.1141 for a copy or to request up-to-date information.
- ☐ You may find further information: <https://youtu.be/pY6vz1O3MBg> (SEC video – additional info)

Questions to ask:

Who is the primary contact person for my account? Is he or she a registered representative of a broker-dealer? If I have concerns about how this person is treating me, who can I talk to?