

ROI Financial Advisors, LLC
Client Relationship Summary
March 29, 2023

Item 1: Introduction

ROI Financial Advisors, LLC is registered with the Securities and Exchange Commission as an Investment Advisor.

Brokerage and investment advisory services and fees differ, and it is important for the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What investment services and advice can you provide me?

Our firm offers asset management and financial planning services to retail clients. We will spend time with you to find out your goals and then offer the appropriate level of services based on that discussion. We offer our services on a discretionary basis, meaning we have the authority to supervise and direct your portfolio without prior consultation with you and non-discretionary basis, meaning, we must obtain your permission before executing a transaction. You do have the opportunity to impose restrictions on your account to us in writing, as long as the restrictions do not prevent our ability to manage your account. We will review your account at least quarterly. We do not require you to have a minimum amount of assets to open an account with us.

FOR ADDITIONAL INFORMATION REGARDING OUR SERVICES, PLEASE SEE ITEMS 4 AND 7 OF OUR FORM ADV PART 2A.

Ask us the following questions:

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

How will you choose investments to recommend to me?

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

Item 3: Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

For our services, you will pay us a monthly fee based on a percentage of assets you have with us. The more money you invest with us, the more fees you will pay, therefore we have an incentive to encourage you to increase the assets in your account. We may provide you additional financial planning services, you will pay either a fixed or an hourly rate agreed upon with you at the time of signing your agreement. While we do not charge you the following, you may also pay fees such as custodial fees, commissions, transactions fees, mutual fund and ETF fees, and account maintenance fees.

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 REGARDING OUR FEES, PLEASE SEE ITEM 5 OF OUR FORM ADV PART 2A.

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Ask us the following question:

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?

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 SOME CONFLICTS WITH YOUR INTERESTS. YOU SHOULD UNDERSTAND AND ASK US ABOUT THESE CONFLICTS BECAUSE THEY CAN AFFECT THE INVESTMENT ADVICE WE PROVIDE YOU. HERE ARE SOME EXAMPLES TO HELP YOU UNDERSTAND WHAT THIS MEANS.

We have two affiliated firms, ROI Tax, LLC and ROI Marketing & Creative Design, LLC, which we may recommend for tax advisory and/or marketing services. If you chose these services, you will pay additional fees to the affiliated firms which creates a conflict due to the financial incentive we have to recommend this service.

FOR ADDITIONAL INFORMATION REGARDING OUR CONFLICTS, PLEASE SEE [ITEM 10 OF OUR FORM ADV PART 2A](#).

Ask us the following question:

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

How do your financial professionals make money?

Our financial professionals are paid a base salary (either fixed or hourly) and if owners eligible to receive a percentage of the profits generated by our firm.

Item 4: Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

Yes. Please visit [Investor.gov/CRS](https://www.investor.gov/crs), for a free and simple tool to research our firm and financial professionals.

Ask us the following question:

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

Item 5: Additional Information

For additional information regarding our fees, services, and conflicts, please see our [Form ADV Part 2A](#), or visit our website at www.roi-fa.com. Please contact us at **503-941-5925** for more up-to-date information or request a copy of this client relationship summary.

Ask us the following questions:

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 this person is treating me?

ROI Financial Advisors, LLC

Registered Investment Adviser

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of ROI Financial Advisors, LLC (ROI Financial). If you have any questions about the contents of this brochure, please feel free to contact us at (503) 941-5925 or by email at: Lance.J.Johnson@ROI-FA.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 ROI Financial Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. ROI Financial Advisors LLC CRD number is: 160100

Main Office

ROI Financial Advisors, LLC
14675 SW Millikan Way
Beaverton, Oregon, 97003
(503) 941-5925
(503) 941-5927 Fax
Lance.J.Johnson@ROI-FA.com

Additional Office Locations

17355 Boones Ferry Road, Suite D
Lake Oswego, Oregon 97035
(503) 941-5925
(503) 941-5927 Fax

5402 SE Foster Road
Portland, Oregon 97206
(503) 777-3353
(503) 774-3455 Fax

www.roi-fa.com

Registration does not imply a certain level of skill or training.

Version Date: 03-29-2023

Item 2: Material Changes

This brochure dated March 29, 2023, is not materially different from our last brochure dated March 21, 2022.

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Item 4: Advisory Business

A. Description of the Advisory Firm

ROI Financial Advisors, LLC is a Limited Liability Company organized in the State of Oregon. The firm was formed in August of 2012, the sole owner is Lance Jarl Johnson.

B. Types of Advisory Services

ROI Financial Advisors, LLC (hereinafter "ROI Financial") offers the following services to advisory clients.

Investment Supervisory Services

ROI Financial offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. ROI Financial creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, risk tolerance levels and other important elements of suitability) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific needs. Investment Supervisory Services include, but are not limited to, the following:

- Investment Strategy
- Personal Investment Policy
- Asset Allocation
- Asset Selection
- Risk Tolerance
- Regular Portfolio Monitoring

ROI Financial evaluates the current investments of each client with respect to their investment objective, risk tolerance levels and time horizon. ROI Financial will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance, tax concerns, retirement planning, college planning, estate planning, and debt/credit planning. These services are based on fixed fees or hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement and as noted below.

One Year Financial Planning Agreement

Clients that choose this option will be billed at the listed fee as determined by the client and ROI Financial and will not be eligible for any discounts from the listed fee found in the Financial Planning Agreement. Services will be provided for one year and there will be no expectation from the client or ROI Financial for Financial Planning services to be provided or fees to be collected past the one year anniversary date of the Financial Planning Agreement.

Annual Renewal Agreement

Clients that choose this option will be offered a discount from the listed prices as stated in the Financial Planning Agreement. The client will be billed on an annual basis at the agreed upon rate. ROI Financial will provide an updated plan to the client each year when fees are paid in full.

Business Module

For clients that own small businesses, ROI Financial can complete Business Financial Planning in conjunction with Personal Financial Planning. The Business Module is offered as an add on to the personal comprehensive financial plan. During the financial planning process, the Business Module will focus on business related cash flows, ownership, owner compensation, retirement plan opportunities, and business related tax scenarios.

Advanced Estate Module

For clients that have large and/or complex estate scenarios, ROI Financial offers an Advanced Estate Module. This module will assist in the planning and implementation of complex trusts (ROI Financial does not offer legal advice, consult an Estate Attorney for the creation of legal documents). The client's options and wishes for estate planning will be included through detailed illustrations. This module is required when the plan is more complex than a standard Living will and/or Living Trust.

Services Limited to Specific Types of Investments

ROI Financial generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETF's, real estate, hedge funds, REITs, insurance products including annuities, and government securities. ROI Financial may use other securities as well to help diversify a portfolio when applicable.

Pension Consulting Services

ROI Financial offers pension consulting services that include: identifying investment objectives and restrictions; allocating plan assets to various objectives; selecting money managers to manage plan assets in ways designed to achieve objectives; selecting mutual funds that plan participants can choose as their funding vehicles; monitoring performance of money managers and mutual funds and making recommendations for changes; and selecting other service providers, such as custodians, administrators, and broker-dealers.

ROI Financial may recommend a retirement plan administrator to clients. ROI Financial may be compensated by the retirement plan services administrator for working with the client. ROI negotiates the compensation and service arrangement with the client, however the client contracts directly with the Plan Administrator for services and fee payment.

C. Client Tailored Services and Client Imposed Restrictions

ROI Financial offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (investment objectives, income, tax levels, and risk tolerance levels), the Financial Planning Checklist and the Risk Assessment Questionnaire which are used to help construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs and targets.

Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent ROI Financial from properly servicing the client account, or if the restrictions would require ROI Financial to deviate from its standard suite of services, ROI Financial reserves the right to end the relationship.

Investment Supervisory Services: Investment Advisory Contract Communications and Reporting Guidelines

Adviser will evaluate client's portfolio on a quarterly basis and contact the client for needed adjustments (non-discretionary model) or make adjustments as needed to the clients account(s)(discretionary model).

Adviser will schedule "in person" meetings with client on an annual basis to discuss client's accounts. Portfolio snapshot reports or numbers will be presented to the client on an annual basis.

Client will receive statements from the custodian on a monthly basis.

Clients will receive a monthly invoice from the Adviser detailing the Adviser's fees. See Item 5 Fees and Compensation for a complete description of the invoice. The Adviser will send the invoice to the client concurrent with the request for payment of the Advisory fees to the custodian. *(Clients are encouraged to compare this information with the fees listed on the custodian account statement and immediately notify the Adviser with any questions or concerns about the billing.)*

Client will promptly notify Adviser of any changes to client's investment profile information (i.e. job and income changes, births or deaths, investment time frame changes, etc.).

D. Wrap Fee Program

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transactions costs, fund expenses, and any other administrative fees. ROI Financial DOES NOT participate in any wrap fee programs.

E. Amount Under Management

ROI Financial has the following assets under management:

Discretionary	Non-discretionary	As of Date
\$123,020,479	\$3,142,122	3/22/23

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Maximum Fee
\$0 - \$250,000	1.75%
\$250,001 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.25%
\$1,000,001 - \$2,500,000	1.15%
\$2,500,001 - \$5,000,000	1.00%
Above \$5,000,000	.85%

These fees are negotiable depending upon the needs of the client and complexity of the situation and the final fee schedule is attaches as Exhibit II of the Investment Advisory Contract. Clients will pay their fees on a monthly basis in arrears. Clients may terminate their contracts with thirty days' written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with the client acknowledgement of their authorization. (See Item B Payment of Fees for a complete description of how clients will be invoiced for fees.)

Financial Planning Fees

Fixed Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$600 and \$4,800. The fees are negotiable. Fees are paid in advance, but never more than six months in advance. Clients may terminate their contracts without penalty within five business days of signing the contract. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the hourly rate of \$250 per hour times the number of hours of work that has been completed up to and including the day of termination. All fees to be refunded and any partially completed work will be provided to the client within 15 business days of ROI Financial being advised in writing of the termination of this agreement.

Financial Planning Modules

Financial Planning
 Protection Planning
 Investment Planning
 Tax Planning
 Retirement Planning
 Estate Planning

		Simple	Moderate		Complex	
		\$100	\$200	\$300	\$400	\$500 \$600
		\$100	\$200	\$300	\$400	\$500 \$600
		\$100	\$200	\$300	\$400	\$500 \$600
		\$100	\$200	\$300	\$400	\$500 \$600
		\$100	\$200	\$300	\$400	\$500 \$600
		\$100	\$200	\$300	\$400	\$500 \$600

If the client needs the following services, they are in addition to the calculated fee above.

Business Module	\$600
Advanced Estate Module	\$600

The basic planning fee will be calculated by the advisor based on the complexity of each service indicated for each module.

Hourly Fees

If a client chooses to elect an hourly rate, the hourly fee for financial planning services is \$250. Fees are billed monthly and in arrears. Uncollected Invoices or Fees are subject to interest accrument outlined in the terms and conditions of the ROI Financial Advisor's Planning Agreement.

Client shall be given thirty (30) days' prior written notice of any increase in fees; the client would need to agree to any modified fee terms by signing a new amendment to their current agreement. If hourly fees are chosen, fees are due within 30 days of invoice. If annual fees are chosen, fees are due within 30 days of anniversary date. In the event the invoice remains unpaid 30 days from the due date a 1.5% per month interest charge will be added to the unpaid amount. All collection costs and attorney fees are paid by the client if the account is not paid as agreed. We reserve the right to stop work on any account that is 30 days past due, in accordance with our firm's stated collection policy.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with the client's written authorization. Fees are paid monthly in arrears. A monthly invoice will be sent to the client detailing the fees and additional information such as the amount of assets under management on which the fee was based, the formula used to calculate the fee, the fee calculation itself and the time period covered by the fee. The name of the custodian will also be included. The invoice to the client will be sent concurrent with the request for payment of the Advisory fees to the custodian. *(Clients are encouraged to compare this information with the information listed on the custodian account statement and immediately notify the Adviser with any questions or concerns.)*

Payment of Financial Planning Fees

Fixed Fees:

The fees are negotiable. Fees are paid in advance, but never more than six months in advance. Clients may terminate their contracts without penalty within five business days of signing the contract. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the hourly rate of \$250 per hour times the number of hours of work that has been completed up to and including the day of termination. All fees to be refunded and any partially completed work will be provided to the client within 15 business days of ROI Financial being advised in writing of the termination of this agreement.

Hourly Fees:

If client chooses to elect an hourly rate, the hourly fee for financial planning services is \$250. Fees are billed monthly and in arrears. Uncollected Invoices or Fees are subject to interest accrument outlined in Section III. Fees of the terms and conditions of the ROI Financial Advisor's Planning Agreement and noted under "Hourly Fees" above.

Fees will be billed at the hourly rate of \$250. Invoice will be delivered to client at the completion of the financial plan.

C. Clients Are Responsible for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by ROI Financial. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

ROI Financial collects Fixed Financial Planning fees in advance and Hourly Financial Planning fees and Investment Advisory fees in arrears. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check.

E. Outside Compensation for the Sale of Securities to Clients

Neither ROI Financial nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or receives fees from the sale of mutual funds.

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

ROI Financial does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

ROI Financial generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Business Owners
- ❖ Retirement Plans

Minimum Account Size

There is no account minimum.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

ROI Financial Advisors LLC's methods of analysis include charting analysis, fundamental analysis, technical analysis, and cyclical analysis.

Charting analysis involves the use of patterns in performance charts. ROI Financial Advisor LLC uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

ROI Financial uses long term trading, short term trading, short sales, margin transactions, and options writing (including covered options, uncovered options, or spreading strategies).

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified, then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

ROI Financial generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize short sales, margin transactions, and options writing. Short sales, margin transactions, and options writing generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies.

Mutual funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. Mutual funds may invest in any of the following investments and would inherit the associated risk.

Equity/Stocks investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Treasury Inflation Protected/Inflation Linked Bonds: The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk (the uncertainty that inflation will undermine the performance of the investment), interest rate risk (the risk that the value of an investment will change due to the absolute interest rate level), default risk (the risk associated with a company or individual failing to repay their debt obligations).

Debt securities carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

Exchange Traded Funds (ETF): Investing in ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FCIC or any other government agency.

Real Estate funds face several kinds of risks that are inherent in this sector of the market. Liquidity risk, market risk and interest rate risk are just some the factors that can influence the gain or loss that is passed on to the investor. Liquidity and market risk tend to have a greater effect on funds that are more growth-oriented, as the sale of the appreciated properties depends upon market demand. Conversely, interest rate risk impacts the amount of dividend income that is paid by income-oriented funds.

Hedge Funds are not suitable for all investors and involve a high degree of risk due to several factors that may contribute to above average gains or significant losses. Such factors include leveraging or other speculative

investment practices, commodity trading, complex tax structures, a lack of transparency in the underlying investments, and generally the absence of a secondary market.

REITs have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

Precious Metal ETFs (Gold, Silver, Palladium Bullion backed “electronic share” not the physical metal): Investing in precious metal ETFs carries the risk of capital loss.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability and inflation.

Short sales risks include the upward trend of the market and the infinite possibility of loss.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral.

Options writing involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. There is nothing to disclose.

Item 10: Other Financial Industry Activities and Affiliations

Lance Johnson is the majority owner of ROI Tax, LLC (“ROI Tax”) which provides tax preparation and tax filing services. These services will be offered to clients of ROI Financial and fees paid to ROI Tax are separate and distinct from the fees paid ROI Financial.

Lance Johnson is a partial owner of an affiliated firm ROI Marketing & Creative Design LLC (“ROI Marketing”). Formed in 2021, ROI Marketing provides branding, outreach and other marketing services for businesses, including ROI Financial and ROI Tax. Employees of ROI Financial may also work with ROI Marketing and services of ROI Marketing may be referred to clients of ROI Financial. Any fees earned under ROI Marketing are distinct and separate from fees clients pay ROI Financial.

ROI Financial always acts in the best interest of the client and clients always have the right to decide whether to utilize the services of any ROI Financial representative in such individuals outside capacities, such as ROI Marketing and/or ROI Tax. Employees of ROI Financial also work with ROI Tax and ROI Marketing and ROI Tax shares office space with ROI Financial. This presents potential conflicts around the sharing of client’s

personal information, fair trade practices, and supervision. To mitigate these conflicts, ROI Financial has put policies in place to supervise and monitor the activities of these shared employees. Additionally, controls are established to ensure access is only provided with the client's permission.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

ROI Financial does not recommend that clients buy or sell any security in which a related person to ROI Financial or ROI Financial has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of ROI Financial may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of ROI Financial to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. ROI Financial will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being sold or bought.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of ROI Financial may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of ROI Financial to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. ROI Financial will always transact client's transactions before its own when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. The Custodian's and Brokers We Use

ROI Financial does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets when you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We require that our clients use TD AMERITRADE Institutional (TD) registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with TD. TD will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While

we require that you use TD as custodian/broker, you will decide whether to do so and will open your account with TD by entering into an agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with TD, then we cannot manage your account. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at TD, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

1. How We Select Brokers/Custodians

We seek to use custodians/brokers that that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payments, etc.)

- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us at TD)

2. Your Brokerage and Custody Costs

For our clients’ accounts that TD maintains, TD generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that they execute or the settle into your TD account. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In order to minimize your trading costs, we have TD execute all trades for your account. We have determined that having TD execute all trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see How We Select Brokers/Custodians”).

3. Products and Services Available to Us from TD

TD AMERITRADE Institutional is TD’s business serving independent investment advisory firms like us. They provide our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to TD retail customers. TD also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. TD’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of TD’s support Services:

Services that benefit you. TD’s institutional brokerage services include access to a broad range of investment

products, execution of securities transactions, and custody of client assets. The investment products available through TD include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. TD's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you. TD also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, TD's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at TD. In addition to investment research, TD also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us. TD also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

TD may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. TD may also provide us with other benefits, such as occasional business entertainment of our personnel.

4. *Our Interest in TD's Services*

The availability of these services from TD benefits us because we do not have to produce or purchase them. We don't have to pay for TD's services. These services are not contingent upon us committing any specific amount of business to TD in trading commissions or assets in custody. We may have an incentive to require that you maintain your account with TD, based on our interest in receiving TD's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of TD as custodian's and brokers is in the best interest of our clients. Our selection is primarily supported by the scope, quality, and price of TD's services (see "How We Select Brokers/Custodians") and TD's services that benefit only us.

B. Aggregating (Block) Trading for Multiple Client Accounts

ROI Financial maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing ROI Financial the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least quarterly. Reviews may be completed or delegated and supervised by Lance Jarl Johnson, Chief Compliance Officer. Mr. Johnson assures client accounts are reviewed and comply with their investment policies and risk tolerance levels.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by the advisor assigned to the client. Financial plans are reviewed upon completion and at each annual update if that service has been selected by the client.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance. Content and Frequency of Regular Reports Provided to Clients

Investment Advisory Contracts:

Each client will receive at least monthly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

ROI Financial will also send a report to each client including a statement of fees each month.

Financial Planning Agreements:

Clients that choose a One Year Agreement option will be billed at the listed fee as determined by the client and ROI Financial and will not be eligible for any discounts from the listed fee found in the Financial Planning Agreement. Services will be provided for one year and there will be no expectation from the client or ROI Financial for Financial Planning services to be provided or fees to be collected past the one year anniversary date of the Financial Planning Agreement.

If the client has elected an Annual Renewal Agreement option, they will be offered a discount from the listed price as stated in the agreement. The client will be billed on an annual basis at the agreed upon rate. ROI Financial will provide an updated plan each year that fees are paid in full.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

We receive an economic benefit from TD in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at TD . These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of TD's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

ROI Financial does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct TD to deduct our advisory fees directly from your account. TD maintains actual custody of your assets. You will receive account statements directly from TD at least monthly. They will be sent to the email or postal mailing address you provided to TD. You should carefully review those statements promptly when you receive them. We also urge you to compare TD's account statements with the periodic invoices you will receive from us. See Item 5 Fees and Compensation for a complete description of ROI Financial Advisors' monthly invoice.

Item 16: Investment Discretion

For those client account where ROI Financial provides ongoing supervision, the client has given ROI Financial written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides ROI Financial discretionary authority via limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian

Item 17: Voting Client Securities (Proxy Voting)

ROI Financial will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

ROI Financial does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither ROI Financial nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

ROI Financial has not been the subject of a bankruptcy petition in the last ten years.

This brochure supplement provides information about Carlos Donat Arjona that supplements the ROI Financial Advisors brochure. You should have received a copy of that brochure. Please contact Lance Jarl Johnson, Managing Member if you did not receive ROI Financial Advisors brochure or if you have any questions about the contents of this supplement.

Additional information about Carlos Donat Arjona is also available on the SEC's website at www.adviserinfo.sec.gov.

ROI Financial Advisors, LLC

A Registered Investment Adviser

Form ADV Part 2B – Individual Disclosure Brochure

for

Carlos Donat Arjona

Personal CRD Number: 7446955

Investment Adviser Representative

Main Office

ROI Financial Advisors, LLC
14675 SW Millikan Way
Beaverton, Oregon, 97003

(503) 941-5925

(503) 941-5927 Fax

Lance.J.Johnson@ROI-FA.com

Additional Office Locations

17355 Boones Ferry Road, Suite D
Lake Oswego, Oregon 97035

(503) 941-5925

(503) 941-5927 Fax

5402 SE Foster Road
Portland, Oregon 97206

(503) 777-3353

(503) 774-3455 Fax

Item 2: Educational Background and Business Experience

Name: Carlos Donat Arjona **Born:** 1997

Education Background and Professional Designations:

Education:

BS Finance, University of Portland, 2019

BS Operations and Technology Management, University of Portland, 2019

MS Finance, University of Portland, 2021

Designations:

None

Business Background:

01/2021 - Present	Customer Service Specialist and Financial Analyst ROI Financial Advisors
11/2011 - 05/2021	Full Time Student

Item 3: Disciplinary Information

None

Item 4: Other Business Activities

ROI TAX LLC (ROI TAX) is indirectly owned partly by Mr Carlos Arjona which provides tax preparation and tax filing services. These services will be offered to clients of ROI Financial. ROI Financial always acts in the best interest of the client and clients always have the right to decide whether to utilize the services of any ROI Financial representative in such individuals outside capacities. Employees of ROI Financial also work with ROI Tax. This presents potential conflicts around the sharing of client's personal information, fair trade practices, and supervision. To mitigate these conflicts, ROI Financial has put policies in place to supervise and monitor the activities of these shared employees. Additionally, controls are established to ensure access is only provided where needed and protected.

CADOAR ENTERPRISES, LLC (CADOAR) was established as a holding company for other businesses, including ROI Tax, LLC. Carlos Arjona is the sole owner and manager. Carlos Arjona currently spends less than 1% of his time on CADOAR.

Item 5: Additional Compensation

Carlos Arjona receives additional compensation for the services conducted under ROI Tax.

Item 6: Supervision

As the Chief Compliance Officer and representative of ROI Financial Advisors, Lance Jarl Johnson supervises all duties and activities of the firm. Lance Johnson can be contacted by calling the main office number at 503-941-5925.

Carlos Arjona adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

This brochure supplement provides information about Trevor Patrick Bruno that supplements the ROI Financial Advisors brochure. You should have received a copy of that brochure. Please contact Lance Jarl Johnson, Managing Member if you did not receive ROI Financial Advisors brochure or if you have any questions about the contents of this supplement.

Additional information about Trevor Patrick Bruno is also available on the SEC's website at www.adviserinfo.sec.gov.

ROI Financial Advisors, LLC

A Registered Investment Adviser

Form ADV Part 2B – Individual Disclosure Brochure

for

Trevor Patrick Bruno

Personal CRD Number: 7300888

Investment Adviser Representative

Main Office

ROI Financial Advisors, LLC
14675 SW Millikan Way
Beaverton, Oregon, 97003

(503) 941-5925

(503) 941-5927 Fax

Lance.J.Johnson@ROI-FA.com

Additional Office Locations

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Lake Oswego, Oregon 97035

(503) 941-5925

(503) 941-5927 Fax

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Portland, Oregon 97206

(503) 777-3353

(503) 774-3455 Fax

Item 2: Educational Background and Business Experience

Name: Trevor Patrick Bruno **Born:** 1998

Education Background and Professional Designations:

Education:

BS Finance, Oregon State University 2020

Designations:

None

Business Background:

08/2020 – Present	Financial Analyst ROI Financial Advisors
06/2019 – 08/2019	B & SI Intern Travelers Indemnity Co.
06/2018 – 08/2018	Claims Intern Travelers Indemnity Co.
06/2017 – 08/2017	Account Manager SMI Solutions, Inc

Item 3: Disciplinary Information

None

Item 4: Other Business Activities

ROI TAX LLC (ROI TAX) is indirectly owned partly by Mr Trevor Bruno which provides tax preparation and tax filing services. These services will be offered to clients of ROI Financial. ROI Financial always acts in the best interest of the client and clients always have the right to decide whether to utilize the services of any ROI Financial representative in such individuals outside capacities. Employees of ROI Financial also work with ROI Tax. This presents potential conflicts around the sharing of client’s personal information, fair trade practices, and

supervision. To mitigate these conflicts, ROI Financial has put policies in place to supervise and monitor the activities of these shared employees. Additionally, controls are established to ensure access is only provided where needed and protected.

TPB ENTERPRISES, LLC (TPB) was established as a holding company for other businesses, including ROI Tax, LLC. Trevor Bruno is the sole owner and manager. Trevor Bruno currently spends less than 1% of his time on TPB.

Item 5: Additional Compensation

Trevor Bruno receives additional compensation for the services conducted under ROI Tax.

Item 6: Supervision

As the Chief Compliance Officer and representative of ROI Financial Advisors, Lance Jarl Johnson supervises all duties and activities of the firm. Lance Johnson can be contacted by calling the main office number at 503-941-5925.

Trevor Bruno adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

This brochure supplement provides information about Lance Jarl Johnson that supplements the ROI Financial Advisors brochure. You should have received a copy of that brochure. Please contact Lance Jarl Johnson, Managing Member if you did not receive ROI Financial Advisors brochure or if you have any questions about the contents of this supplement.

Additional information about Lance Jarl Johnson is also available on the SEC's website at www.adviserinfo.sec.gov.

ROI Financial Advisors, LLC

A Registered Investment Adviser

Form ADV Part 2B – Individual Disclosure Brochure

for

Lance Jarl Johnson

Personal CRD Number: 2244093

Investment Adviser Representative

Main Office

ROI Financial Advisors, LLC
14675 SW Millikan Way
Beaverton, Oregon, 97003

(503) 941-5925

(503) 941-5927 Fax

Lance.J.Johnson@ROI-FA.com

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(503) 941-5925

(503) 941-5927 Fax

5402 SE Foster Road
Portland, Oregon 97206

(503) 777-3353

(503) 774-3455 Fax

Item 2: Educational Background and Business Experience

Name: Lance Jarl Johnson **Born:** 1968

Education Background and Professional Designations:

Education:

BS Finance, Rochester Institute of Technology - 1992

Designations:

CRPC® - Chartered Retirement Planning Counselor SM

MINIMUM QUALIFICATIONS:

- Successfully complete the program;
- Pass the final examination; and
- Comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.
- Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.
- Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:
 - completing 16 hours of continuing education;
 - reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self-disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct; and
 - paying a biennial renewal fee

Business Background:

08/2012 – Present	Managing Member Chief Compliance Officer ROI Financial Advisors, LLC
10/2010 - 12/2011	Independent Business Consultant Self-Employed
03/1993 – 10/2010	Financial Advisor Ameriprise Advisors

Item 3: Disciplinary Information

Mr. Johnson has a disciplinary history that occurred more than ten years ago, the details of which can be found on the IAPD www.adviserinfo.sec.gov . Search for Lance Jarl Johnson CRD #2244093 and click on Disclosures for a complete description.

Item 4: Other Business Activities

Lance Johnson is engaged in the following additional business activities. ROI Financial does not find that these business activities create a material conflict of interest with clients. He spends a very small portion of his time on these enterprises.

ROI TAX LLC (ROI TAX) is indirectly owned partly by Mr Lance Johnson which provides tax preparation and tax filing services. These services will be offered to clients of ROI Financial. ROI Financial always acts in the best interest of the client and clients always have the right to decide whether to utilize the services of any ROI Financial representative in such individuals outside capacities. Employees of ROI Financial also work with ROI Tax. This presents potential conflicts around the sharing of client's personal information, fair trade practices, and supervision. To mitigate these conflicts, ROI Financial has put policies in place to supervise and monitor the activities of these shared employees. Additionally, controls are established to ensure access is only provided where needed and protected.

ROI MARKETING & CREATIVE DESIGN LLC (ROI MARKETING) started in 2021 providing branding, outreach, and other marketing services for businesses. ROI Marketing is an affiliated firm of ROI Financial. Lance Johnson is a one third partner in the ownership of ROI Marketing. Mr. Johnson spends approximately 20 hours per month on business development and planning, operational oversight and hiring staff. ROI Marketing & Creative Design provides marketing services for ROI Financial Advisors LLC, ROI Tax LLC and other clients.

LMJ ENTERPRISES LLC, (LMJ) was established as a holding company for commercial real estate and other businesses, including ROI Tax, LLC. Lance Johnson is the sole owner and manager. Lance Johnson currently spends less than 1% of his time on LMJ.

BEAR RIVER INVESTMENT GROUP LLC (BEAR RIVER) owns rental property in Sun River Oregon. Lance Johnson and his spouse Michele Johnson are sole owners of BEAR RIVER. Lance Johnson manages the property and all aspects of BEAR RIVER. He spends less than 1% of his time on BEAR RIVER and the associated property.

JRL ENTERPRISES LLC (JRL) was established to purchase an RV. The RV may be used for recreational purposes by the owners and/or leased. JRL is owned by Lance Johnson (1/3) and two other partners, each owning 1/3. The co-owners are both clients of ROI. Mr. Johnson does

not find any conflict of interest with ROI in owning this recreational vehicle with these clients. Lance Johnson spends less than 1% of his time on JRL.

Item 5: Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Lance Johnson does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through ROI Financial Advisors. Lance Johnson does receive additional compensation for the rental property and ROI Tax discussed above.

Item 6: Supervision

As the Chief Compliance Officer and Founding Member of ROI Financial Advisors, Lance Johnson is not under the direct supervision of anyone individual. Lance Johnson supervises all duties and activities of the firm. Lance Johnson's contact information is on the cover page of this disclosure document. Lance Johnson adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements. Lance Johnson can be contacted by calling the main office number at 503-941-5925.



2023 Annual Privacy Notice

At ROI Financial Advisors, LLC ("ROI"), your privacy is our priority. We collect personal information to open your accounts, to manage your portfolios and to help us provide a better level of service. We protect the security and confidentiality of the personal information that we collect for both our current and former clients. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information and we do everything we can to maintain that trust. The following are details of our approach to privacy.

1. We do not sell your personal information to anyone.

2. ROI only shares personal information with third parties and affiliate companies that help us process transactions or service your account (for example executing your trades, acting as your custodian, or mailing your account statements).

We may also disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required by law (for example, to cooperate with regulators or law enforcement authorities, resolve client disputes, perform credit/authentication checks, or for risk control). Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so.

3. We collect personal information in the normal course of business in order to administer your accounts and serve you better.

Application and Registration Information

We collect information that you provide to us when you open an account, make application to or through ROI for the purchase of a securities product or service. The information we collect may include name, address, phone number, e-mail address, Social Security number, financial information and information about your investment desires and experience. We also may collect information from consumer reporting agencies to verify your identity in the account opening process.

Transaction Information

Once you have an account with us, to administer your account and better serve you, we collect and maintain personal information about your transactions, including balances, positions and history, and may include your name or other data in an internal client list that reflects your activities at ROI and with outside contracted providers.

4. We use your personal information to fulfill our regulatory obligations and to help us deliver the best possible service to you.

ROI is required by its various regulatory authorities such as the US SEC and state jurisdictions to collect, review and maintain certain personal information such as investment history or financial data.

Also, the USA PATRIOT Act requires that ROI collect and verify certain personal information to assist it in verifying the identity of its clients and the sources of funds in an effort to prevent money laundering and terrorism.

5. We protect the confidentiality and security of your personal information.

Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. We restrict access to personal information to select employees and agents who have a need to know such information for business purposes only. All such employees are trained and required to safeguard such information. We also maintain physical, electronic and procedural safeguards to guard your personal information.

6. We continue to evaluate our efforts to protect personal information and make every effort to keep your personal information accurate and up to date.

If you identify any inaccuracy in your personal information, or you wish to make a change to that information, please contact us so that we may promptly update our records.

7. We will provide notice of changes in our information-sharing practices.

If, at any time in the future, it is necessary to disclose any of your personal information in a manner that is inconsistent with this policy, we will give you advance notice of the proposed change so that you have an opportunity to opt out of such disclosure.

If you have any questions or concerns, please contact us by e-mail at lance.j.johnson@roi-fa.com or call us at 1-503-941-5925.

Protection of Customer Information and Records

- ROI has adopted procedures to protect customer information, including the following:
- Customers will be provided the Firm's Privacy Policy at the time an account is opened.
- Computerized customer information is accessed by password protection or other established controls within the ROI system to ensure only authorized persons gain access.
- Requests for customer information from outside parties such as regulators, the IRS, and other government or civil agencies, shall be referred to the CCO for review and response.
- Customer non-public information shall not be provided to non-affiliated third parties and will be provided to affiliated parties (executing dealers, technical service providers who maintain the security of your records etc.) only by written agreement.
- Customers may provide written permission to ROI to share information with other non-affiliated third parties such as attorneys; accountants and other consultants for the purpose of helping ROI better understand the client's financial situation in order to provide more effective investment and financial planning advice to the client.
- All agreements with executing firms, custodians, and other service providers shall include the third party's privacy policies or confidentiality clause as appropriate.
- The integrity of ROI's internal computer systems, including privacy protection, is subject to regular review.
- As required by law, federal authorities and states will be notified if customer information is stolen making it subject to potential identity theft.
- ROI shall assess the impact on customer confidentiality of any new technologies that may be introduced to ROI or that ROI may obtain in the future.
- ROI shall implement the Federal Trade Commission's Red Flags Rule, which implements Section 114 of the Fair and Accurate Credit Transactions Act of 2003 ("FACT Act").

Access to Customer information via Wi-Fi

Because of risk of unauthorized access by outside parties and the difficulty of ensuring the security of wireless connections to the Internet, employees are not permitted to use wireless fidelity (Wi-Fi) to access customer account information, unless:

- The employee is working on the ROI premises; or
- The employee has installed Firm-required fire walls or other protections and has prior approval from the CCO to use Wi-Fi for Firm business.

Remote Access to Customer Accounts

Certain employees may be authorized to work from home or while traveling during which time the Firm's network may be accessed.

- Proper authorization must be requested from the CCO who will ensure that proper passwords are assigned and that a record of authorized employees is maintained. Fire walls and other protections are in place to prevent intrusion by outsiders and breaches of confidentiality.

Disposal of Consumer Report Information and Records

Consumer report information and records will be disposed of in a manner to prevent unauthorized access or use. Procedures include the following:

- Staff Members shall be trained with respect to proper disposal procedures.
- For the purpose of this Section, "consumer report information" shall include any document that contains the name of a client or information pertaining to a client or ROI.
- Paper information identified to be discarded or destroyed shall be shredded. Documents identified for shredding shall be placed in locked shredding bins located in secure areas. Clients are not to be permitted in these areas.
- Staff members are prohibited from maintaining electronic client information on a personally owned computer.
- Electronic information located on ROI computers shall be destroyed or erased so the information cannot be practicably read or reconstructed.