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**Part 2A of Form ADV: Firm Brochure**

**March 16, 2021**

This brochure provides information about the qualifications and business practices of Optimus Advisory Group. If you have any questions about the contents of this brochure, please contact us at (949) 727-4734 or [paul@optimusadvisory.com](mailto:paul@optimusadvisory.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 Optimus Advisory Group (CRD #111239) also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Optimus Advisory Group is a registered investment advisor with the state of California. Being a registered investment advisor does not imply a certain level of skill or training.

## Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment, dated February 18, 2020 we have no material changes to report.

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## Item 4 Advisory Business

### Item 4.A Description of the Advisor

Optimus Advisory Group, LLC is a California registered investment advisor. Optimus Advisory Group was formed in May 2008 and is located in Irvine, CA. Optimus Advisory Group was formerly known as Hewitt Investment Advisory from November 1998 until May 2008. Paul Hewitt is the sole owner and Chief Compliance Officer. Steve Rumsey is an Investment Advisor Representative.

Optimus Advisory Group is a "fee-based" Registered Investment Advisor and as such is not registered or affiliated with any broker/dealer or custodial firm. The term "fee-based" means that Optimus Advisory Group and its Advisory Representatives do not accept commissions for securities recommendations. "Advisory Representatives" are those persons who are appropriately registered and authorized by the Advisor to provide financial or investment advice on behalf of the Advisor.

Optimus Advisory Group is not an insurance agency, but as disclosed in this brochure, the representatives of Optimus Advisory Group are independently licensed insurance agents with various companies. As such, they accept normal commissions paid by insurance companies when clients purchase insurance products.

### Item 4.B Types of Advisory Services

#### Client Services

Optimus Advisory Group offers general financial planning and investment management services to non-professional investors. We may offer a complimentary general consultation to discuss services available, to give a prospective client time to review services desired, and to determine the possibility of a potential Client-Advisor relationship. Services begin only after the Client and Advisor formalize the relationship with a properly executed Client Agreement.

- General Financial Planning services include:
  - Assisting you in defining personal financial goals in the areas of children's education planning, estate planning, insurance planning, investment planning, retirement planning, and general tax planning;
  - Furnishing recommendations as to the allocation of present financial resources among different types of assets including investments and insurance to help you achieve stated financial planning objectives; and
  - Providing you with an *Executive Summary* outlining your personal financial planning goals and our recommendations.

General financial planning does not focus on written comprehensive plans, but can assist you with the various components of your overall planning needs. These services can be limited to specific financial planning areas by request. You should consult your personal tax advisor, legal counsel, or other professionals for expert opinions on issues relating to matters outside of investment advisory topics. Financial planning services are not ongoing and terminate upon the conclusion of services.

- Investment Management services involve ongoing and continuous portfolio management. There is an initial data-gathering process and a review of your current financial situation including both short-term and long-term objectives. Depending upon the nature of services desired we will

recommend certain strategies and asset allocations that primarily invest in mutual funds and exchange traded funds. The strategies recommended are normally managed by us, though from time to time we may recommend strategies managed by an independent manager or wrap fee program unaffiliated with our company. Such may be the case when an independent manager or wrap fee program offers investment platforms and services that may be of interest to you and/or provide access to institutional style services.

### Advisor Services

In addition to services to private clients, Optimus Advisory Group provides services to unaffiliated investment professionals via Strategy License Agreements and Sub-Advisory services. These services are not offered directly to the investing public. These services are limited in scope as we do not act as the primary advisor for investors utilizing these programs through their own investment professionals.

We own certain technology that processes financial market data using proprietary mathematical algorithms and produces periodic instructions to buy or sell certain securities. We have created several investment strategies based on these periodic instructions. These investment strategies are offered to investment professionals in the following ways:

- Strategy License Agreement - We provide a non-exclusive license to Registered Investment Advisors and other financial professionals that wish to utilize our investment strategies in their practice.
- Sub-Advisor - We provide portfolio management to Registered Investment Advisors that wish to hire us as a sub-advisor for their client accounts. In such cases, the referring Registered Investment Advisor retains the role of primary advisor to their client. These sub-advisor relationships are established through various Separately Managed Account platforms, Unified Managed Account platforms, and Turnkey Asset Management Programs that we participate in as a model portfolio manager.

In addition to the above, Optimus Advisory Group is contracted as a wrap fee program manager as described in Item 4.D. The model portfolio development and management services do not involve individualized services to investors unless a contracted Optimus Advisory Group client elects to participate in one or more of the wrap fee programs. Please see Item 4.D for additional information.

### **Item 4.C Client-Tailored Services and Client-Imposed Restrictions**

We believe that each client presents a unique set of needs, goals, and experiences. We focus on providing individualized services and can tailor services to focus only on certain portfolio components and/or advice, depending upon the client's wishes and/or the nature of the engagement. You may impose reasonable restrictions on investing in certain securities or types of securities if agreed in writing between you and us. Where these services or information are limited, you must understand that your comprehensive investment needs and objectives may not be fully considered due to your desire to receive limited services.

We require you to play an active role in the formation of the investment plan and recommendations. Our advice and recommendations will be based on information you provide and we are not required to verify the data or financial information. During the course of the engagement, you may call the office to discuss your portfolio or ask questions. We recommend you initiate a meeting with us no less than annually. You are obligated to immediately inform us of any changes in your financial situation to provide us the opportunity to review your portfolio to ensure it is still structured to help meet the stated needs and objectives.

Where Financial Planning Services only focus on certain areas of client interests, needs, or are otherwise limited, you must understand that your overall financial and investment needs and objectives may not be considered as a result of time and/or service restraints placed on our services and/or the limited disclosure of information you provide.

If additional services are desired outside the scope of an engagement, we may be available to provide additional services. In such cases, we may request a new or amended Client Agreement and additional advisory fees may apply. We will not engage in services that will result in additional fees without your direction.

#### **Item 4.D Wrap Fee Programs**

A wrap fee program is an investment advisory program in which you pay one fee for both investment services and transaction costs in your account. The wrap fee is not based directly upon the actual transaction or execution costs for the transactions within your account. Investors in wrap fee programs remain the owner of all securities held in their account(s) and have all ownership rights associated with these securities.

When an investor participates in a wrap fee program, their personal Investment Advisor will charge an advisory fee for the personalized services the Advisor provides to investor pursuant to the agreement between the investor and the Advisor. The wrap fee program sponsor and the program manager do not receive any portion of the investment advisory fee as it relates to your account.

The services of the wrap fee program are provided under a written agreement with the program sponsor(s). The program sponsor charges investors a fee that wraps its charges for administration, investment services, trading costs, custody, and reporting fees, in addition to the fees it pays to the managers who run the various model portfolios that are utilized in the program.

As a manager to wrap fee programs, Optimus Advisory Group is contracted by the Sponsors, such as Orion Portfolio Solutions, to provide services only to the program. As a wrap fee program manager, we are contracted to provide development, strategy design, and management of model portfolios within the respective programs. The services provided by a wrap fee manager do not and are not intended to consider the individual needs of the investors. For its role as a wrap fee program manager, Optimus Advisory Group receives an asset-based management fee from the Sponsors. This fee represents a portion of the wrap fee charged to the investors for participation in their programs.

These wrap fee programs are Advisor-directed in that investors in the programs utilize the advice and services of their own Registered Investment Advisor who assists them with ongoing individualized advice, customized recommendations, monitoring, rebalancing, etc. The only exception exists when Optimus Advisory Group's private clients elect to participate in these wrap fee programs and have executed an individual Investment Management Agreement to receive personalized services directly from us. In such case, our private clients can expect to execute an agreement with Optimus Advisory Group for our personalized investment management services and a separate agreement with the program sponsor to participate in the wrap fee programs.

Our receipt of an asset-based fee paid by the program sponsor(s) would represent a conflict of interest with our private clients who wish to participate in these wrap fee programs. In an effort to alleviate this conflict of interest, Optimus Advisory Group reduces the investment management fee charged to its private clients to offset the fee it receives from the program sponsor(s). In preparing the advisory fee

deduction, the Advisor considers the assets to be invested in the wrap fee program, other managed assets, the nature and complexity of the services to be provided, time and effort, and any other factors that impact the individualized services to be provided.

#### **Item 4.E Assets Under Management**

As of December 31, 2020, we managed approximately \$54,322,000 in client assets on a discretionary basis and \$428,000 in client assets on a non-discretionary basis.

### **Item 5 Fees and Compensation**

#### **Item 5.A Fee Schedules**

##### Client Services

- General Financial Planning - Fees for financial planning services are a non-negotiable \$175 per hour and due at the time of service.
- Investment Management Services - Advisory fees are agreed upon at the time of engagement and are based upon the assets to be managed and services to be provided. Fees are negotiable and may be modified at our discretion based upon certain factors such as the nature and complexity of services to be provided and/or portfolio to be managed, pre-existing relationships, family members of our firm and its representatives, etc. As described at Item 4.D, fees may be waived or modified on the portion of a managed portfolio that is invested in a wrap fee program that is managed by Optimus Advisory Group, depending upon the level, scope, and nature of services associated with those assets. Fees are charged quarterly in advance unless the managed accounts are managed through Orion Portfolio Solutions as these accounts are invoiced monthly in arrears.

Advisory fees are based upon the market value of the assets managed, set forth by the custodian, as of the last market day of the previous billing period except for funds managed through Orion Portfolio Solutions where the fees are calculated using the account's average daily balance. Where services are initiated or terminated at any time other than the beginning of a billing period, advisory fees will be pro-rated. We reserve the right to provide modified or *pro bono* services to certain clients, which may include but are not limited to, family members of our firm and its representatives, and certain charitable organizations. Our advisory fee schedule is as follows:

##### Standard Fee Schedule

Client A.U.M.	Advisor Fee
\$0.00 - \$99,999.99	1.500%
\$100,000.00 - \$249,999.99	1.400%
\$250,000.00 - \$499,999.99	1.300%
\$500,000.00 - \$999,999.99	1.200%
\$1,000,000.00 - \$1,999,999.99	1.100%
\$2,000,000.00 +	1.000%

## Advisor Services

- Strategy License Agreement - Registered Investment Advisors shall pay a royalty based on the dollar value of the assets under management of their clients, employees, investment advisor representatives, and officers, which are managed using the strategy license. Royalties are pro-rated and paid on a monthly basis.
- Sub-Advisor - Fees for sub-advisory services are negotiable as determined by written agreement between the unaffiliated advisory firm and Optimus.

### **Item 5.B Payment of Fees**

Payment of advisory fees may be made directly to us or through a debit directly to your account by the qualified custodian holding your funds and securities. We adhere to the following criteria when payment is made via a qualified custodian as required by the State of California's Corporation Code:

1) The client provides written authorization permitting the fees to be paid directly from the client's account held by the independent qualified custodian and the authorization is limited to withdrawing contractually agreed upon Investment Advisor fees; 2) The Advisor will send to the client a statement showing the calculation of the proposed advisor fee in conjunction with each proposed deduction; 3) The client will directly receive regular (monthly or quarterly) reports directly from the qualified custodian which reflect the Advisor's fee deduction; 4) The frequency of fee withdrawal shall be specified in the written authorization; 5) The custodian of the account shall be advised in writing of the limitation on the Advisor's access to the account and; 6) The client shall be able to terminate the written billing authorization or agreement at any time.

It is important to note that custodial firms do not verify advisory fees. Therefore, you should review your custodial statements and our fee calculations. If you should have any questions or concerns in connection with an advisory fee deduction, you should promptly contact us. You must also ensure that the custodial firm has your current address. If at any time during the engagement, you fail to receive the regular statements produced by the custodian, it is important for you to promptly notify us and the custodial firm.

### **Item 5.C Clients are Responsible for Third-Party Fees**

All fees paid to us for advisory services are separate from any management fee charged by the wrap fee manager (including Optimus) selected to manage assets.

In addition to advisory fees, you may pay transaction fees and brokerage commissions to the broker/dealer, custodian, or other service providers as well as any fees associated with your particular accounts (e.g., account opening, maintenance, transfer, termination, wire transfer, retirement plan, trust fees, custodial fees, overlay fees, and all such applicable third party fees, deferred sales charges, odd lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions).

All fees paid to us for advisory services are separate from the fees and expenses charged to shareholders of ETF's or mutual funds. If a mutual fund previously purchased by or selected by you should impose a sales charge, you may pay an initial or deferred sales charge. We do not receive any portion of these fees. A complete explanation of the expenses charged by a mutual fund or ETF is



contained in the prospectus. You are encouraged to read each fund prospectus and securities offering document before investing. We do not receive any portion of these investment-related fees. You should read all disclosure documents before investing.

When providing retirement plan-related services, the advice and recommendations are limited to plan service providers and their offerings. The advice provided by us may include recommendations for updates and reviews.

### **5.D Prepayment of Fees**

Fees are charged quarterly in advance unless the managed accounts are managed through Orion Portfolio Solutions as these accounts are invoiced monthly in arrears.

Clients are welcome to terminate services at any time by providing us with written notice. Where our ADV 2 has not been delivered at least 48 hours prior to the execution of the Client Agreement, services may be terminated within 5 days with no fees due (or any prepaid fee will be promptly refunded). Alternatively:

If Financial Planning Services are terminated prior to the conclusion of services, we will prepare an invoice for hourly services provided up until the effective date of termination.

If Investment Management Services are terminated, we will only charge for services provided up until the effective date of termination. Where fees were prepaid quarterly, we will return a pro-rated refund of fees along with a statement of how the refund was calculated. If services were invoiced monthly in arrears, we prepare an invoice for services provided, on a pro-rated basis, up until the effective date of termination.

### **5.E Outside Compensation for the Sale of Securities**

We do not accept commissions in exchange for advice and recommendations pertaining to securities. We are only compensated in the form of hourly and asset-based advisory fees paid by our clients and entities that contract our services.

Optimus Advisory Group is not a broker/dealer and its Advisory Representatives are not Registered Representatives of any broker/dealer.

## **Item 6 Performance-Based Fees and Side-by-Side Management**

We do not accept performance-based advisory fees (fees that are based upon a share of capital gains or capital appreciation, or performance, for any portion of funds under an advisory contract).

Side-by-side management occurs when an Advisor is engaged in providing performance-based portfolio management for the performance-based fees while providing non-performance portfolio management for other clients. This blend of services can pose conflicts of interests. Since our fees are not performance-based, we do not engage in side-by-side management services.

## Item 7 Types of Clients

We offer general financial planning and investment management services to non-professional individuals, families, trusts, estates, pension and profit sharing plans, corporations, and other business entities. We do not require a minimum portfolio size. However, we reserve the right to decline to offer services to any person or firm at our sole discretion.

If the Account assets for which we provide services represent only a portion of the assets of an employee benefit plan, the client will remain responsible for determining an appropriate overall diversification policy for the assets of such plan.

We also offer investment signals and sub-advisory services to Registered Investment Advisors and other financial professionals.

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

### Client Services

- Investment Management - We attempt to measure your risk tolerance, time horizon, goals, and objectives through an interview and data-gathering process in an effort to determine an investment plan and/or portfolio to best fit your profile, based on information you provide. Your participation and delivery of accurate and complete information are critical to the process.

The portfolios we manage range from conservative to aggressive. Investing in securities involves risk of loss and you should be prepared to bear that loss.

- Optimus Tactical ETF Portfolios use our tactical investment strategies that are based on proprietary mathematical algorithms and technical analysis. Assets are invested primarily in ETFs though tradeable mutual funds can be used. Some Tactical ETF Portfolios are not diversified and most experience frequent trading. Leveraged inverse ETFs and/or mutual funds are used in some portfolios. Optimus Tactical ETF Portfolios may be suitable for investors who seek a managed, diversified portfolio and have a minimum three-year to five-year time horizon.
- Optimus Tactical Mutual Fund Portfolios are predominately based on the same proprietary mathematical algorithms and technical analysis as our Tactical ETF Portfolios and are generally reserved for accounts of less than \$50,000. Assets are invested primarily in mutual funds though ETFs can be used. Leveraged inverse ETFs and/or mutual funds are used in some portfolios. Optimus Tactical Mutual Fund Portfolios may be suitable for investors who seek a managed, diversified portfolio and have a minimum three-year to five-year time horizon.

In this section of our disclosure, we attempt to discuss the main drawbacks and limitations of our strategies and analysis methods. As this brochure is a publicly available document, we are pleased to provide additional information regarding our proprietary algorithms separately.

*Technical Analysis* is a method of evaluating securities by analyzing the statistics generated by market activity, such as past prices and volume. There are multiple technical analysis methods that can be employed. Generally speaking, technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. The

field of technical analysis is based on three assumptions: 1. The market discounts everything; 2. Price moves in trends; and 3. Historical performance of stocks and markets are likely indications of future performance.

Technical Analysis can be difficult at the onset, as analysts need to learn various indicators and patterns and understand how they relate to investor sentiment and behavior then devise methods of how these issues may impact stock price. Like other analysis methods, technical analysis is not 100% percent accurate or reliable. Relative success depends on the analyst, the analysis tools and the stock or market itself. Often there can be contradicting results (such as when the overall market is heading in one direction and the particular share price is pointing to the opposite direction).

The interpretation of technical indicators is subjective. The same indicator could be interpreted as bullish by one side of the camp and as bearish by the other side. The subjective aspect gives way to another drawback of technical analysis which is the validation of a biased view. The analyst may have already formed a view based on the state the economy is currently or the situation of the market and sector the company is operating in. An example of this is investors who are entrenched in the idea that gold (or some other investment) may perform in a certain way. This is obviously not a wise use of technical analysis but human nature as it is, it can happen.

*Market Trend Analysis* can be very simply described as an aspect of technical analysis that tries to predict the future movement of a stock based on past data. Trend analysis is based on the idea that what has happened in the past gives traders an idea of what will happen in the future. Trend analysis can be difficult to master because of the need to understand the various indicators and patterns and how they relate to investor sentiment and psychology in addition to how these factors could impact the investment prices. As with any investment strategy, this analysis is not 100% reliable especially since the interpretation of the data depends upon the analyst.

*Economic Analysis* looks to business cycles, monetary policies, fiscal policies, economic indicators, national events, global events, trade, inflation, public sentiment, GDP growth, unemployment, productivity, capacity utilization, etc. Economic indicators are almost exclusively backward looking, while the stock market (market indicators) is forward looking. The stock market may react to economic forces (unemployment, retail sales, etc.), in shaping future earnings and stock prices. There are some limitations as to how indicators will impact the market (such as may be the case with a particular week's unemployment figures that have no impact on the stock market). It is difficult for even the most seasoned economic analysts to prepare market forecasts using various sets of correlating and non-correlating economic indicators. Therefore, economic analysis is utilized to enhance other investment analysis methods since many other factors contribute to the movement of the equity market.

*Fundamental Analysis* involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. This method of analysis primarily uses real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security. For example, an investor can perform fundamental analysis on a bond's value by looking at economic factors, such as interest rates and the overall state of the economy, and information about the bond issuer, such as potential changes in credit ratings. For assessing stocks, this method uses revenues, earnings, future growth, return on equity, profit margins, and other data to determine a company's underlying value and potential for future growth. In terms of stocks, fundamental analysis focuses on the financial statements of the company being evaluated. Very broadly described, this type of analysis involves a method of evaluating a security that entails attempting to measure its intrinsic value by examining related economic, financial, and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economic and industry conditions) and company-specific factors (like financial

condition and management). The end goal is to produce a value that an investor can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

This method of security analysis is considered to be the opposite of technical analysis.

Fundamental analysis is performed on historical and present data, but with the goal of making financial forecasts. There are several possible objectives:

- to conduct a company stock valuation and predict its probable price evolution;
- to make a projection on its business performance;
- to evaluate its management and make internal business decisions;
- to calculate its credit risk.

Fundamental analysis is not without its drawbacks and it can be tedious and time consuming. Once a trend in the fundamentals of the company is established, normally the future growth will be extrapolated using that trend. The extrapolation is a subjective exercise and should be cautiously assessed. There is also a time delay when doing fundamental analysis as the financial data that the analyst is reviewing is always from the previous year or previous quarter. Additionally, the analyst has to rely on data that is in part prepared by the company itself and there is always a risk that it is inaccurate.

Moreover, even if a fundamentally strong company at the right price is identified, it does not mean that the company shares are going to move anytime soon. Therefore, some holdings may need to be held for quite some time. The share market can also be driven by investor sentiment and it can sometimes swing in extremes. There is always danger that an analyst will miss the opportune buy/sell times.

*Strategic Asset Allocation* in a range (% of total assets) is a relatively passive investment style, wherein the assets and weightings are set and are carefully monitored to maintain risk control. Selected asset classes and their weightings focus on the overall investment objective and risk tolerance of the client. This strategy places a great emphasis on minimizing portfolio turnover and trading/transaction costs. Of course the asset allocation mix for an individual investor is depending upon a number of factors including data that is provided by the investor in terms of objectives, goals, time horizon, risk tolerance, etc. and these factors change over time.

Recommendations for or purchases of investments will be based on publicly available reports and analysis. In the case of funds, recommendations will be based on reports and analysis of performance and managers, and certain computerized models for asset allocation and investment timing. Portfolio holdings or recommendations are generally judged by (managers' or investments') experience, track record, and performance of like-kind investments. We will actively manage each portfolio and investors should generally expect to remain fully invested within the ranges of their selected asset allocation plan at all times unless restated by the client. However, at times we will not find attractively priced investments and may hold cash until we deem appropriate.

It is important that you promptly notify us of any change in your financial condition so we have the opportunity to assess any possible changes needed in the advice, recommendations, or investment strategies. Changing conditions in your financial life or significant changes in market conditions may warrant a collaborative effort with you to modify their strategic investment framework, which consequently may also trigger changes to investment holdings within the portfolio.

We attempt to be conscious and sensitive to tax-related investment considerations. However, Optimus Advisory Group is not a tax professional. You are encouraged to seek the guidance of your tax professional in an effort to understand how their investments (proposed or implemented) will affect their overall tax situation.

Please review the aforementioned section which discusses the strategies utilized and their drawbacks and limitations. While clients receive individualized advice, we take the general position that investors with diverse portfolios have a better chance of making a profit because it is difficult to accurately predict all variables that affect marketable securities. It is important to understand that no single strategy can be relied upon to outperform the market.

Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a chance of material risk of loss using any of those strategies.

You may make additions to and withdrawals from the account at any time, subject to our right to terminate an account. You may withdraw account assets on notice to us, subject to the usual and customary securities settlement procedures. We generally design our client portfolios as long-term investments and asset withdrawals may impair the achievement of your investment objectives. Additions may be in cash, cash equivalents, and securities provided that we reserve the right to liquidate any transferred securities, or decline to accept particular securities into a your account. We may consult with you about the options and ramifications of transferring securities when provided pre-notification of your intentions. In such cases, you are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (*i.e.*, contingent deferred sales charge), and/or tax ramifications.

You may choose to make self-directed securities transactions, which are investments not reviewed and/or not recommended by us. In such cases, we have not passed on the suitability of said investments and while we may assist with client-directed implementation as a value-added service at your request, we will not manage these types of investments unless agreed in writing. We generally seek investment strategies that do not involve significant risk or unusual risk beyond that of the general domestic and/or international equity and bond markets.

Investments in individual stocks and bonds (and even mutual funds and ETFs) can be risky. Some risks can be controlled and some risks can be guarded against but no investment strategy can carry guarantees from loss. Certain market risks cannot be controlled, such as market or economic conditions. Certain strategies may be employed to adjust portfolios as market conditions change or the Advisor and client may agree to hold the portfolio's course. Thoughtful investment selections that meet your stated goals and risk profile may help keep individual stock and bond risks at an acceptable level.

Fixed income investments generally are utilized as a portfolio diversification element as well as for income deriving investments outside of equity exposure. There are certain risks involved in investing in all types of bonds: Government; Municipal; and Corporate. The following is an overview of the types of risks that one should consider: interest rate risk; reinvestment risk; inflation risk; market risk; selection risk; timing risk; and price risk. Additional risks for some government agency, corporate, and municipal bonds may include: legislative risk (a change in the tax code could affect the value of taxable or tax-exempt interest income); and call risk (some corporate, municipal and agency bonds have a "call provision" entitling their issuers to redeem them at a specified price on a date prior to maturity. Declining interest rates may accelerate the redemption of a callable bond, causing an investor's

principal to be returned sooner than expected. In that scenario, investors have to reinvest the principal at the lower interest rates. Additional risks for corporate and municipal bonds may include: credit risk; default risk; event risk; and duration risk.

Most leveraged and/or inverse ETFs and mutual funds "reset" daily, meaning that they are designed to achieve their stated objectives on a daily basis. Their performance over longer periods of time—over weeks or months or years—can differ significantly from the performance (or inverse of the performance) of their underlying index or benchmark during the same period of time. This effect can be magnified in volatile markets. There is always a risk that not every leveraged and/or inverse ETF or mutual fund will meet its stated objective on any given trading day. Leveraged and/or inverse ETFs and mutual funds may be more costly than traditional ETFs and mutual funds, and may be less tax-efficient than traditional ETFs and mutual funds, in part because daily resets can cause the ETF or mutual fund to realize significant short-term capital gains that may not be offset by a loss. Be sure to check with your tax advisor about the consequences of investing in a leveraged and/or inverse ETF or mutual fund.

You are hereby advised to read each offering document carefully before investing.

*Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that all clients should be prepared to bear.*

#### Advisor Services

- Sub-Advisor and Investment Signals - We developed several tactical and alternative model portfolios for use by other Registered Investment Advisors.

The model portfolios invest in mutual funds and exchange traded funds ("ETFs"). These funds may be long or inverse, leveraged or unleveraged. Decisions to buy or sell the funds are based solely on our proprietary mathematical algorithms. These algorithms use trend-following and technical analysis.

We expect significant trading activity in these portfolios. Frequent trading may increase brokerage costs, transaction charges, and taxes. The higher cost associated with frequent trading may reduce an investor's performance. The use of leveraged mutual funds or ETFs increases risk of loss.

### **Item 9 Disciplinary Information**

There are no legal or disciplinary events associated with the Advisor and its Advisory Representatives.

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

We have various relationships or arrangements that are material to our business and you. These relationships or arrangements may create a conflict of interest as described below.

- Insurance Agent - Paul Hewitt and Steve Rumsey are licensed insurance agents with the State of California and are appointed with various insurance companies. We may recommend, on a fully disclosed commission basis, the purchase of life insurance, health insurance, disability insurance, and long-term care insurance. Receipt of commissions does not present a conflict of interest. Insurance products are often recommended to minimize your exposure to identifiable risks and to meet personal and/or business needs. Although you are under no obligation to purchase insurance products recommended, you may do so when needs arise. You are always welcome to utilize the insurance provider of your choice and may implement recommendations in whole or in part, entirely at your discretion. We spend less than five hours per week on this business.



We do not have any material relationships to this advisory business that would present a possible conflict of interest other than the fact the Advisory Representatives are separately engaged as licensed insurance agents as described in this Brochure. We do not maintain registration relationships with any of the following:

- Broker-dealer;
- Municipal securities dealer;
- Government securities dealer or broker;
- Investment company;
- Other pooled investment vehicle (such as a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund);
- Other investment advisor or financial planner;
- Futures commission merchant;
- Commodity pool operator or commodity trading advisor;
- Banking or thrift institution;
- Lawyer or law firm;
- Insurance company or agency;
- Pension consultant;
- Real estate broker or dealer;
- Sponsor or syndicator of limited partnerships.

We do not operate and do not have a material relationship with a hedge fund or other type of private pooled investment vehicle.

Please reference Item 4.D of this brochure for information about our duties as portfolio manager for unaffiliated wrap fee programs.

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

We take the issue of regulatory compliance seriously and are committed to maintain compliance with state and applicable federal securities laws. Additionally, we have a position of public trust and it is our goal to maintain that trust, and to provide excellent service and advice that is suitable. We place great value on ethical conduct. Therefore, the ultimate goal of our internal policies is not only to the letter of the law, but also to the ideals we set forth.

You may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered Investment Advisor, Optimus Advisory Group is a fiduciary to each and every client. As fiduciaries, Investment Advisers owe their clients several specific duties. According to the United States Securities Commission ("SEC"), to which state regulators defer on this subject, an Investment Advisor's fiduciary duties include:

- Advice that is suitable;
- Full disclosure of material facts and potential conflicts of interest (such that the client has complete and honest disclosure in order to make an informed decision about our services and investment recommendations);
- Utmost and exclusive loyalty and good faith;
- Best execution of transactions under the available circumstances;

- Reasonable care to avoid ever misleading clients;
- Only acting in the best interests of clients.

It is our policy to protect your interests and to place your interests first and foremost in each and every situation. We will abide by honest and ethical business practices including, but is not limited to:

- We will not induce trading in your account that is excessive in size or frequency in view of the financial resources and character of the account.
- We will make investment decisions with reasonable grounds to believe that the decisions are suitable for you on the basis of information furnished by you and we will document suitability.
- We will not borrow money from you.
- We will not recommend the purchase of a security without the reasonable belief that the security is registered, or the security or transaction is exempt from registrations in states where we provide investment advice and based upon information that we receive.
- We will not recommend that you place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of a broker/dealer that is not licensed, based upon information available to us.
- All personal securities transactions will be reported to Paul D. Hewitt, Chief Compliance Officer of Optimus Advisory Group as required by securities rules and regulations.
  - Reportable trades are all securities with these exceptions:

Transactions effected pursuant to an automatic investment plan;

Securities held in accounts over which we have no direct or indirect influence or control;

Transactions and holdings in direct obligations of the Government of the United States;

Money market instruments - bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments;

Shares of money market funds;

Transactions and holdings in shares of mutual funds, because we have no material relationship with an investment company which would otherwise require reporting;

Transactions in units of a unit investment trust if the unit investment trust is invested exclusively in unaffiliated mutual funds.

We emphasize your unrestricted right to decline to implement any advice rendered, in whole or part. Where we are granted discretionary authority of your accounts, you are welcome to set investment parameters and/or limitations in writing and such direction is followed until such time your instructions are amended in writing.



We have established written policies and procedures for staff persons who may invest personal monies. Individuals associated with our firm may have similar investment goals and objectives and as a result may buy or sell securities for their personal accounts that may be identical to or different from those recommended to clients. Thus, at times the interests of our personnel members' accounts may coincide with the interests of clients' accounts. However, at no time will our firm or any related person receive an added benefit or advantage over clients with respect to these transactions, nor will we place ourselves in a position to have added benefit as a result of advice given to clients. Our personnel 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. The Chief Compliance Officer of Optimus Advisory Group is responsible for the monitoring of personal trading conducted by staff and instituting controls relating to such activities.

All applicable securities rules and regulations will be strictly enforced. We will not permit and have instituted controls against insider trading. Advisory Representatives and administrative personnel who do not follow our Code of Ethics or who in any way violate securities rules and regulations, or who fail to report known or suspected violations will be disciplined or terminated. Such persons could also face action by the SEC and/or state securities regulators.

## **Item 12 Brokerage Practices**

Our Advisory Representatives are not registered with any broker/dealer firm and do not accept commissions as a result of securities recommendations.

Clients who engage us for financial planning services are welcome to implement advice and recommendations, in whole or in part, via the financial services provider(s) of their choice.

We recommend the services of TD Ameritrade Institutional, a division of TD Ameritrade, Inc., Member FINRA/SIPC, ("*TD Ameritrade*") which provides custodial and account services to independent advisors and their clients. We also recommend the services of Orion Portfolio Solutions.

### **12.A Factors in Selecting Custodial and Brokerage Service Providers**

When recommending these preferred service providers, we consider their respective financial strength, reputation, execution, pricing, research, and service. The larger brokerage operations enable us to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by your selected service provider may be higher or lower than those charged by other broker-dealers. We believe that excellent customer service and trade execution available through our preferred services provider is superior to most non-service oriented and internet-based brokers that may otherwise be available to the general public. Our recommended service providers feature a broad line of products and services that may be suitable to many types of investors with varying investable assets.

We recognize our duty to obtain best price and execution for you under the circumstances available. The decision to recommend the preferred service providers is also based upon the customer service provided to investors and the services available to us, and providing such recommendation is consistent with our fiduciary duty to you. We also consider our experience with the service providers, the providers' reputation, and the quality of execution services and costs. You should also evaluate these service providers before opening an account. While fees may vary via the preferred service providers, we have determined these firms currently offer the best overall value to us and you for the brokerage and technology provided.

In fulfilling our duties to you, we endeavor at all times to put your interests first. You should be aware; however, that our receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence our choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services. Such services are associated with our participation in the brokerage/custodial firms' institutional services provided to independent investment advisors and include the following:

*Services received that benefit clients* include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through the recommended service providers include some which we might not otherwise have access or that would require a significantly higher minimum investment by our clients. These services generally benefit you and your account.

*Services that may not directly benefit clients* are those products and services that our recommended service providers make available to our firm but may not directly benefit our clients or their accounts. These products and services assist us in managing and administering our clients' accounts and include investment research (both the broker/dealers' and that of third parties). We may use this research to service all or some substantial number of our clients' accounts, including those maintained away from the broker/dealer providing the research. In addition to research, these service providers also make available software and other technology that provides access to client account data (such as duplicate trade confirmations and account statements); facilitates trade execution and allocation of orders for multiple accounts; provides pricing and other market data, facilitates payment of advisory fees from client accounts, and assists with back-office functions, recordkeeping and client reporting.

*Services that generally benefit only the Advisor* are those other benefits intended to help us manage and further develop our business enterprise. These services include access to educational conferences and events as well as technology. Additionally, the custodial firm may provide additional services relating to general compliance news and information, general legal data and business consulting, as well as publications and conferences on practice management and business succession. The service provider may also offer access to employee benefits providers, human capital consultants, and business insurance providers. The service providers may provide these services themselves and in other cases, they will arrange for third-party vendors to provide services to our firm. The recommended custodial firms may also discount or waive fees for some services or pay all or a portion of a third-party's fees. Rarely, the service providers may also provide us with other benefits such as occasional business entertainment of our personnel such as may occur during trade conferences. The Chief Compliance Officer monitors all gifts and other considerations. We will not permit the acceptance of any entertainment related events including, but not limited to, sporting events, concerts, or shows without written pre-approval from the Chief Compliance Officer.

Our recommended custodial firms generally do not charge our clients separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through the service provider or that settle into the service provider's accounts (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions).

If you request us to arrange for the execution of securities brokerage transactions via limited discretionary authority of your managed account, we shall direct such transactions through broker-dealers that we recommend and reasonably believe will provide best execution. We will not accept client directed brokerage. We shall periodically and systematically review our policies and procedures regarding recommending broker-dealers to you in light of our duty to obtain best execution.

On rare occasions, trade errors may occur. Our process is to correct trade errors via trade error accounts established with our preferred custodial firms. If there is a loss from the trade error, we will reimburse you for the loss. Conversely, if there is any gain from the trade error, the custodial firm will deposit the funds into our trade error account which can be used to offset any future trading errors.

## **12.B Aggregation (Block Trading) for Multiple Client Accounts**

Your transactions generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among our clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among our clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that we aggregate client orders for the purchase or sale of securities, including securities in which our Advisory Representatives may invest, we will generally do so in accordance with applicable rules promulgated under the Advisors Act and no-action guidance provided by the regulatory staff. We will not receive any additional compensation or remuneration as a result of the aggregation.

In the event that we determine that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include:

- when only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates;
- allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts;
- if an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed);
- with respect to sale allocations, allocations may be given to accounts low in cash;
- in cases when a pro rata allocation of a potential execution would result in a *de minimis* allocation in one or more accounts, we may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or
- in cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

## Item 13 Account Reviews and Reports

Investment Management Services are continuous and ongoing services to include frequent monitoring and internal reviews of portfolio assets no less than quarterly. The frequency of and processes for the internal portfolio reviews are dependent upon the nature and complexity of the portfolio and at our discretion. Reviews may also occur at the time of significant deposits or withdrawals. Reviews generally entail analyzing securities, sensitivity to various markets, investment results and other factors. We may also review a portfolio if your asset allocation deviates over the target acceptable limits, at which time rebalancing is considered. Steve Rumsey, Portfolio Manager, and Paul Hewitt, Portfolio Manager, each conduct reviews for their respective clients.

Individual portfolio reviews with you are conducted at your request, at our discretion, or according to the interval agreed upon in the engagement letter. The timing of portfolio reviews conducted with you is guided by your stated objectives or at our discretion. However, we prefer you initiate meetings at least annually. In all cases, *you are obligated to promptly contact us when there exists a real or potential change in your financial condition so we can review the portfolio along with your new information to ensure the investment strategies continue to be appropriate.*

We are also available to provide General Financial Planning services on an hourly or project basis. These services are not ongoing in nature and terminate upon the conclusion of services. While the advice provided may include a recommendation for review or meeting at a later date, you are never obligated to engage us for additional and/or future services, but are welcome to do so under a new or amended agreement.

You can expect to receive confirmation statements for all transactions and regular account statements, directly from the broker/dealer or custodian. The custodian's regular reports detail account value, net monthly change, portfolio holdings, and all account activity.

## Item 14 Client Referrals and Other Compensation

From time to time we may compensate certain individuals for referring clients to us. The referral fees we pay vary, depending upon the size of the account established by the client referred to us. The persons referring the clients do not engage in the management of client's accounts, but are deemed to be investment advisory representatives or maintain registration separately. The State of California requires registration of persons who receive compensation for referrals. We may register those persons providing these limited services or the solicitors will be registered under another entity. These referral services are via a written agreement between the solicitor and us. The payment of referral fees is disclosed to the clients via a compensation disclosure document that is delivered at the time of the referral along with our then-current ADV Part 2. These fees do not affect the advisory fees paid by clients.

## Item 15 Custody

We do not provide custody services for your funds or securities. Your funds and securities are held at your selected custodial services provider(s). We have limited access to your accounts held at qualified custodial firms to a) deduct contractually agreed investment management fees with your authorization and/or b) to execute transactions in securities where limited discretionary authority is granted. In all cases, you have a direct and beneficial interest in your securities (individual ownership), rather than an undivided interest in a pool of securities.

You can expect to receive regular and customary account statements directly from your custodian(s) and you should carefully review these statements. If you find that statements are not being received or if you find any discrepancies in statement information, you must promptly communicate this information to us and your custodial firm.

## **Item 16 Investment Discretion**

We may maintain limited power of attorney to execute trades as evidenced by the Client Agreement. We do not have authority to withdraw funds or securities and will not take custody of the same, except where we are authorized to deduct advisory fees and facilitate transactions with the client's authorization. In each case, the fee deductions will be coordinated through a qualified custodian.

## **Item 17 Voting Client Securities**

We do not vote proxies. Clients must ensure that proxy materials are sent directly to them or their assigned third party. We do not take action with respect to any securities or other investments that become the subject of any legal proceedings, including bankruptcies.

We are willing to consult with clients who have questions about proxies. In the event that our proxy advice is solicited, we shall only furnish voting advice to existing clients. We will not solicit proxies from non-clients.

When providing proxy advice to clients, we will disclose any significant relationship with the issuer, its affiliates or a security holder proponent of the matter on which proxy voting advice is given, as well as any material interest of ours in the matter. We will not accept any special fee or remuneration for furnishing the voting advice from any person other than the security holder recipient thereof.

Our voting advice will not be provided on behalf of any person soliciting proxies, or on behalf of a participant in an election contest subject to SEC Rule 14a-11. We will never communicate with the press concerning a particular proxy. We do not solicit proxies and we recognize that any deviations from these stated policies may require us to comply with SEC Proxy Registration Rules.

## **Item 18 Advisor Financial Information**

Our firm does not have any financial condition that would be likely to impair our ability to meet contractual commitments to clients, nor have we ever been the subject of a bankruptcy petition.

We do not require nor solicit prepayment of more than \$500 in advisory fees per client, six months or more in advance of services and therefore are not required to include a balance sheet with this Brochure.

## **Item 19 Disclosure for State - Registered Advisors**

The principal executive officer is Paul Hewitt. His formal education and business background is described in Part 2B of Form ADV: Brochure Supplement. Additionally, an ADV 2B is prepared for each Advisory Representative that is engaged in the delivery of financial and investment advisory services for Optimus Advisory Group. The applicable ADV 2B Brochure is delivered to the client who receives the benefit of the particular Advisory Representative's advice and recommendations.

Optimus Advisory Group is solely engaged in the business of providing investment management services. As previously disclosed in this Brochure, the advisory Representatives are separately engaged as licensed insurance representatives.

We do not accept performance-based fees in connection with its advisory services.

We do not accept commissions for securities recommendations.

We do not have any relationship or arrangement with any issuers of securities.

We have not been involved in any arbitration claims or any civil, criminal, regulatory, or self-regulatory proceedings. We have not had a registration or license suspended or revoked.



**Part 2B of Form ADV: Brochure Supplement**

**Paul D. Hewitt**  
Optimus Advisory Group  
6 Venture, Suite 200  
Irvine, CA 92618  
(949) 727-4734

May 19, 2015

This brochure supplement provides information about Paul D. Hewitt that supplements the Optimus Advisory Group brochure. You should have received a copy of that brochure. Please contact Paul Hewitt if you did not receive Optimus Advisory Group's brochure or if you have any questions about the contents of this supplement.

Additional information about Paul Hewitt is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Hewitt's CRD number is: 2477273



## Item 2 Educational Background and Business Experience

**Paul D. Hewitt** - Born 1972

*Post-Secondary Education:*

- Pitzer College - B.A. Economics
- Claremont Graduate University - MBA Finance

*Examinations and Licenses:*

- FINRA: Series 6, 7, 24, 63 (*inactive* - not affiliated with a broker/dealer)
- NASAA: Series 65 Investment Adviser Law Exam
- State of California: Insurance Licensed

*Business Background:*

- Optimus Advisory Group, LLC, Managing Member & Chief Compliance Officer, 2008 - Present (formerly known as "Hewitt Investment Advisory")
- Sammons Securities Company, Registered Representative, 2006 - 2009
- Hewitt Investment Advisory, Owner, 1998 - 2008
- Royal Alliance Associates, Inc., Registered Representative, 1994 - 2006

## Item 3 Disciplinary Information

There are no legal or disciplinary events.

## Item 4 Other Business Activities

Other than salary, Mr. Hewitt does not receive any economic benefit from any person, company, or organization, either directly or indirectly, in exchange for providing clients with advisory services through Optimus Advisory Group other than as previously disclosed in our ADV Part 2A. Mr. Hewitt is also engaged as an independently licensed insurance agent and as such will earn normal commissions paid by insurance companies if clients purchase insurance through him.

## Item 5 Additional Compensation

There is no additional compensation other than as noted above.

## Item 6 Supervision

Paul Hewitt is the Managing Member and Chief Compliance officer of Optimus Advisory Group and supervises all Investment Advisor Representatives and the firm's day-to-day operations.

Our firm's supervisory system establishes clear lines of authority, accountability, and responsibility. Our firm takes the issue of compliance and risk management seriously. Clients are welcome to contact Mr. Hewitt with questions or concerns in connection with our services, staff monitoring, or our internal compliance program. Mr. Hewitt's contact information is listed on the cover page of ADV Part 2A and ADV 2B.

## Item 7 Requirements for State Registered Advisers

There are no additional disclosures.





**Part 2B of Form ADV: Brochure Supplement**

**Steve K. Rumsey**  
Optimus Advisory Group  
6 Venture, Suite 200  
Irvine, CA 92618  
(949) 727-4734

May 19, 2015

This brochure supplement provides information about Steve K. Rumsey that supplements the Optimus Advisory Group brochure. You should have received a copy of that brochure. Please contact Paul Hewitt if you did not receive Optimus Advisory Group's brochure or if you have any questions about the contents of this supplement.

Additional information about Steve Rumsey is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Mr. Rumsey's CRD number is 2572676.

## Item 2 Educational Background and Business Experience

**Steve K. Rumsey** - Born 1961

*Post-Secondary Education;*

- University of Redlands - B.S. Business Management
- Pepperdine University - MBA

*Examinations and Licenses:*

- FINRA: Series 6, 7, 22, 63 (*inactive* - not affiliated with a broker/dealer)
- NASAA: Series 65 Investment Advisor Law Exam
- State of California: Insurance Licensed

*Business Background:*

- Optimus Advisory Group, LLC, Advisory Representative, 2008 - Present (formerly known as "Hewitt Investment Advisory")
- Sammons Securities Company, Registered Representative, 2006 - 2009
- Rumsey Asset Management, Owner, 1997 - 2008
- Royal Alliance Associates, Inc., Registered Representative, 1996 - 2006

## Item 3 Disciplinary Information

There are no legal or disciplinary events.

## Item 4 Other Business Activities

Other than salary, Mr. Rumsey does not receive any economic benefit from any person, company, or organization, either directly or indirectly, in exchange for providing clients with advisory services through Optimus Advisory Group other than as previously disclosed in our ADV Part 2A. Mr. Rumsey is also engaged as an independently licensed insurance agent and as such will earn normal commissions paid by insurance companies if clients purchase insurance through him.

## Item 5 Additional Compensation

There is no additional compensation other than as noted above.

## Item 6 Supervision

Paul Hewitt is the Managing Member and Chief Compliance officer of Optimus Advisory Group and supervises all Investment Advisor Representatives and the firm's day-to-day operations.

Our firm's supervisory system establishes clear lines of authority, accountability, and responsibility. Our firm takes the issue of compliance and risk management seriously. Clients are welcome to contact Mr. Hewitt with questions or concerns in connection with our services, staff monitoring or our internal compliance program. Mr. Hewitt's contact information is listed on the cover page of ADV Part 2A and his ADV 2B.

## Item 7 Requirements for State-Registered Advisers

There are no additional disclosures.