



Conkin Financial Group, Inc.

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ADV Part 2A – Disclosure Brochure

Effective: March 16, 2024

This Part 2A of Form ADV (“Brochure”) provides information about the qualifications and business practices of Conkin Financial Group, Inc. If you have any questions about the contents of this Brochure, please contact Conkin Financial Group, LLC at (405) 348-6200 or steve.conkin@conkinfinancial.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration with the SEC or state regulatory authority does not imply any specific level of skill or training. This Brochure provides information about Conkin Financial Group, Inc. to assist you in determining whether to retain the Adviser.

Additional information about our Firm is available on the SEC’s website at www.adviserinfo.sec.gov. The site may be searched by a unique identifying number known as a CRD number. Our Firm’s CRD number is 328254.

ITEM 2: MATERIAL CHANGES

This Brochure is Conkin Financial Group, Inc.'s annual amendment that contains changes since its last filing on November 28, 2023. The Firm encourages all current and prospective clients to read this Brochure and discuss any questions you have with the Adviser. Should you have any additional questions regarding our Firm or the contents of this Brochure, please contact Steven Conkin, Chief Compliance Officer at (405) 348-6200.

MATERIAL CHANGES

Since our last filing, this Brochure has been updated as follows:

- Update to reflect the Firm's registration with the State of Texas
- Update value of assets under management for the Firm as of December 31, 2023
- Remove BNY Mellon Pershing as a Custodian recommended by the Firm

FULL BROCHURE AVAILABLE

From time to time, we will amend this Disclosure Brochure to reflect changes in business practices, regulations, and other routine updates as required by the respective regulators. This complete Disclosure Brochure or a Summary of Material Changes will be provided to you at least annually or when a material change occurs.

To request a complete copy of our Brochure, please contact us by telephone at (405) 348-6200 or by email at steve.conkin@conkinfinancial.com. Alternatively, you can view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our Firm name or our CRD No. 328254.

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ITEM 4: ADVISORY BUSINESS

A. FIRM DESCRIPTION

Conkin Financial Group, Inc. (referred to as “we,” “our,” “us,” the “Firm,” “Adviser,” or “CFG”) is an Oklahoma Corporation, founded in 1981, and based in Edmond, Oklahoma. The Firm is registered in Oklahoma and Texas. The Firm’s principal owner is Steven Conkin, who also acts as the Firm’s Chief Compliance Officer. Additional information about Mr. Conkin’s background may be found in the accompanying Form ADV Part 2B Brochure Supplement.

CFG offers a variety of investment management and related financial services to our clients, all of which are discussed below in further detail. The purpose of this Disclosure Brochure is to disclose the conflicts of interest associated with the investment transactions, compensation, and any other matters related to investment decisions made by our Firm or its representatives.

B. TYPES OF ADVISORY SERVICES

CFG dedicates itself to understanding the intricacies of each client. For all investment management and related services described below, we tailor our products in accordance with the client-specific needs obtained from documented discussions, a financial plan and/or risk assessment. Before providing investment management services, CFG takes multiple factors into consideration, including, but not limited to, investment objectives, investment horizon, risk tolerance, as well as any reasonable guidelines and restrictions a client may impose.

Investment Management Services

We offer discretionary and non-discretionary investment management services based on the specific needs and objectives of such persons and the suitability of products and services. We reserve the right to decline to offer our services to a client or potential client if we deem it to be in the best interest of the client, potential client, or the Firm. For discretionary accounts, the client provides our firm authorization to perform various functions, without further approval from the client, such as the determination of securities to be purchased or to be sold for the client’s account without permission from the client prior to each transaction. Clients will be required to execute instructions regarding the Firm’s trading authority as required by each custodian. For non-discretionary investment advisory services, we will obtain client approval prior to taking any action in the client’s account, including but not limited to, executing trades. We do not act as a custodian of client assets, and the client will always maintain control of their assets.

Prior to providing the client with investment management services, the Firm requires the client to execute an Investment Management Agreement (“IMA”) which outlines the services the Firm will provide and fees the client will incur for these services.

Upon execution of the IMA, CFG works closely with our clients to understand their current financial situation, existing resources, financial goals, risk tolerance, investment history, investment knowledge and time horizon. CFG uses the information provided by our clients to construct an customized investment portfolio for each client. CFG’s professional liability (“E&O”)

policy covers all of CFG's discretionary and non-discretionary investment management services and the products CFG utilizes when constructing the client's investment portfolio.

Financial Planning Services

If a client engages CFG to provide financial planning services, we require a Financial Planning Agreement ("FPA") which outlines the services we will provide and the fees the clients will incur for those services. We provide our clients with an in-depth analysis of their current financial situation, as well as detailed recommendations related to the client's financial goals. The financial plan may include one or more of the following:

- Identification of Financial Goals
- Investment Analysis
- Budgeting, Cash Flow and Debt Analysis
- College Savings Planning
- Retirement Planning and Analysis
- Risk Management & Analysis
- Estate Planning
- Tax Planning & Strategies
- Insurance Review

A copy of the written financial plan is provided to Clients. Clients retain the right to decide whether to act upon our recommendations and is under no obligation to act upon CFG's recommendations. Should the client elect to act on any recommendation made by CFG, the client is under no obligation to affect the transactions through the Firm.

Investment Advisory Consulting Services for Business Retirement Plans

CFG offers investment advisory consulting services specifically tailored to the needs and special circumstances of businesses, including their pension and retirement plans. These services are generally provided in conjunction with other professionals and include investment management services for retirement plans.

The Firm may be engaged to assist a business in ensuring its investment offerings in the Plan are consistent with the investment objective designed by the Plan, recommending investments to the Plan Sponsor and/or Investment Adviser, assist the Plan Sponsor in ensuring the investments follow the Plan's Investment Policy Statement, provide non-discretionary portfolio recommendations to Plan Participants based on a suitability analysis, and consult with Plan Participants.

In such engagements, the Firm may serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA").

C. TAILORED RELATIONSHIPS

The advisory services and recommendations offered by the Firm are based on the individual needs of our clients and the suitability of products and services. The client's investment strategy is tailored to their specific needs and is designed based on the Client's current financial situation, investment objectives, and risk tolerance.

Clients may impose reasonable restrictions on investing in certain securities or types of securities in writing. CFG will make every effort to comply with the wishes of the client but cannot guarantee absolute adherence due to the use of model portfolios, indexed products, funds, and exchange traded funds (“ETFs”). If the Firm is not able to honor the client’s request due to the nature of the investments, the make-up of the model portfolio, or because the restriction prevents CFG from properly servicing the client, CFG will notify the client accordingly and the client or Firm have the right to terminate the relationship.

D. WRAP FEE PROGRAMS

CFG does not participate in and is not a sponsor of wrap fee programs.

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions, and affiliated and unaffiliated investment advisers through which the clients of such firms receive discretionary investment advisory, execution, clearing, and custodial services in a “bundled” form. In exchange for these “bundled” services, the clients pay an all-inclusive (or “wrap”) fee determined as a percentage of the assets held in the wrap account.

E. ASSETS UNDER MANAGEMENT

When calculating regulatory assets under management, an investment adviser must include the value of any advisory account over which it exercises continuous and regular advisory or management services. As of December 31, 2023, CFG reports \$20,526,298.00 in client assets on a discretionary basis and \$0.00 on a non-discretionary basis.

ITEM 5: FEES AND COMPENSATION

The following paragraphs detail the fee structure and compensation methodology for services provided by CFG.

A. FEE SCHEDULE

Investment Management Services

CFG charges clients an annual fee for its investment management services in accordance with its standard fee schedule below. The fee is calculated based on a percentage of the value of the client’s assets under management, including all cash and other assets in the account on the last business day of the month (the “Account Value”).

The investment management fee charged may be subject to negotiation with each client based on the size of the account, prospective growth and other factors that may differ from client to client. The specific fee to be assessed will be outlined in the advisory agreement signed by the client.

CFG's Standard Fee Schedule:

Assets Under Management ¹	Annual Advisory Fee
< \$249,999.99	1.50%
\$250,000.00 - \$499,999.99	1.25%
\$500,000.00 - \$999,999.99	1.15%
\$1,000,000.00 - 1,999,999.99	0.75%
\$2,000,000.00 - \$4,999,999.99	0.50%
\$5,000,000.00 <	0.25%

CFG advisors have clients who began working with them as Investment Adviser Representatives (“IAR”) at a different Registered Investment Adviser. The fees paid by these client’s may be grandfathered in accordance with that prior relationship but will not exceed 1.50%.

Financial Planning Services

CFG offers financial planning on a fixed fee basis and our fixed fee shall not exceed \$10,000. The fee is determined based on the scope and complexity of the financial planning services Client is seeking, the client’s financial situation and objectives. At the outset, we will establish and disclose to the client all applicable fees, fee payment arrangements, and terms of the engagement in the FPA executed between the firm and the client prior to providing any financial planning services. Lower fees for comparable services may be available from other sources.

Investment Advisory Consulting Services for Business Retirement Plans

CFG offers Investment advisory services for business retirement plans on a fixed fee basis or based on the value of the Plan’s assets under management, including all cash and other assets in the account (valued as liquidation value). For retirement plans whose portfolio value is less \$500,000.00, CFG charges a flat fee of up to \$5,000.00. For retirement plans whose portfolio value exceeds \$500,000.00, CFG’s fees are calculated as a percentage of the Plan’s assets under our management and will vary depending on the specifics of each Plan, but not to exceed 1.00%. Our fees are negotiable solely at our discretion on the size and complexity of the Plan, the number of Plan participants, the scope of services requested, and other factors that may be deemed relevant by CFG.

Unless otherwise specified, fees are charged monthly, in arrears. The client’s first billing cycle will be prorated based on the number of days the adviser provided advisory services to the Plan and the value of the Plan during the first month CFG provides services to the Plan.

¹ No fee is charged for non-discretionary accounts held on the Custodian platform as a courtesy to the client. Non-discretionary accounts are identified as accounts held by the clients for which the firm does not provide advice or services on a regular basis.

B. PAYMENT OF FEES

Investment Management Services

Unless otherwise specified, fees are billed monthly in arrears based on the Account Value on the last business day of the month. The client's first billing cycle will be prorated based on the number of days the client's account was open and how much was funded into the account during their first month. The client's last billing cycle will be prorated based on the number of days the client's account was open during the month and the Account Value on the day the relationship is terminated.

Clients must provide our Firm, and the custodian where required, written authorization permitting direct payment of advisory fees from their account(s) held by an independent custodian. The custodian sends a statement to the client, at least quarterly, showing all account disbursements, including advisory fees.

CFG or the client may terminate the advisory agreement within five (5) business days of signing the investment management agreement without penalty to the client. After the five-day period, the Client may voluntarily terminate the advisory agreement at any time. CFG may voluntarily terminate the engaged advisory services for any reason with thirty (30) days written notice delivered to the Client by certified or registered mail. The effective date of the termination will be thirty (30) days from the date of receipt of the written notice.

Financial Planning Services

We will provide the client an invoice for our financial planning services upon the completion of the service(s). Payment must be remitted within thirty (30) days of receipt of the invoice. Financial planning fees will be paid via check, ACH, or credit card through a third-party payment processor. Additional transaction fees charged by any payment processor in the collection of these fees are borne by the Firm.

Investment Advisory Consulting Services for Business Retirement Plans

Fees due for investment advisory services for business retirement plans paying on a fixed fee basis are charged quarterly, in arrears. Adviser will invoice the Client at the end of the quarter for the fee owed and payments are due within twenty (20) days of the receipt of invoice. Payment shall be remitted via check or credit card.

Fees due for investment advisory services for business retirement plans that are calculated based on a percentage of the market value of the Plan's portfolio value under our management shall be paid monthly, in arrears, and are deducted by the custodian directly from the Plan's assets under management and remitted to CFG as appropriate. The client will provide written authorization permitting the fees to be paid directly from the Plan assets. Both CFG's retirement plan agreement and the custodial / clearing agreement may authorize the custodian to debit the account(s) for CFG's service fees and directly remit that fee to CFG in compliance with regulatory procedures.

C. OTHER FEES AND PAYMENTS

There may be additional fees or charges that result from transferring accounts to the Custodian (“ACAT fees”) and the maintenance of or trading within a client’s account. These are fees that are imposed by third parties in connection with investments made through a client’s account, such as custodial and investment fees. In addition to our advisory fees, clients are responsible for paying fees associated with the investments in their accounts. The Firm may, at its discretion, reimburse clients for any ACAT fees incurred in moving assets to the Custodian in which the Firm manages.

Clients may also pay holdings charges imposed by the chosen custodian for certain investments, such as, charges imposed directly by a mutual fund, index fund, or exchange traded fund, which shall be disclosed in the fund’s prospectus (e.g., fund management fees, and other expenses), distribution fees, surrender charges, IRA and qualified retirement plan fees, other fund expenses, mark-ups and mark-downs, spreads paid to market makers, fees for trades executed away from the custodian, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. Our Firm does not receive a portion of these fees.

D. PREPAYMENT OF FEES

Investment Management Services

CFG fees are due monthly and paid in arrears so there will be no prepayment of investment advisory fees.

Financial Planning Services

CFG does not generally charge, in advance, for financial planning services. In the event the client selects a payment plan option that requires some payments due prior to the completion of the financial plan, CFG will not require prepayment of fees of more than \$500 per client, six (6) months or more in advance.

Investment Advisory Consulting Services for Business Retirement Plans

CFG fees are due monthly, or quarterly, depending on the size of the business retirement plan, in arrears so there will be no prepayment of business retirement plan fees.

E. OTHER COMPENSATION

Steven Conkin, in his individual capacity, is licensed as an independent insurance professional to sell Life, Accident, Health, Variable Life, and Variable Annuity insurance products and may engage in product sales with clients, for which he will receive additional compensation. CFG is not an insurance agency, and any insurance recommendations are separate and apart from Mr. Conkin’s role with CFG. Any commissions Mr. Conkin may receive through the sale of insurance policies do not offset advisory fees the client may pay for advisory services from CFG. This practice presents a conflict of interest because the person providing investment advice on behalf of CFG who is also an independent insurance agent who has an incentive to recommend insurance

products to clients for the purpose of generating commissions rather than solely based on the client's needs. CFG mitigates this conflict of interest by ensuring the conflict of interest is properly disclosed to the client and ensure that our related persons follow our Firm policies and procedures related to its fiduciary duty to the clients and always putting the client's interest first. Furthermore, clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our Firm.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

A. PERFORMANCE-BASED COMPENSATION

CFG does not assess Performance Fees.

Performance-Based Fees ("Performance Fees") are based on a share of the capital gains or capital appreciation of the assets of a client. Our fees are calculated as described in Item 5 above.

B. SIDE-BY-SIDE MANAGEMENT

CFG does not provide Side-By-Side Management.

"Side-by-Side Management" refers to a situation in which the same adviser manages accounts that are billed based only on a percentage of assets under management and at the same time manages other accounts for which fees are performance-based.

ITEM 7: TYPES OF CLIENTS & ACCOUNT REQUIREMENTS

Our Firm offers advisory services to individuals and high net worth individuals, trusts, estates, charitable organizations, pension and profit-sharing plans, corporations, limited liability companies and/or other business types. The Firm does not require clients to have a minimum account balance to work with our firm.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

INVESTING IN SECURITIES INVOLVES A RISK OF LOSS THAT YOU, AS A CLIENT, SHOULD BE PREPARED TO BEAR. THERE IS NO GUARANTEE THAT ANY SPECIFIC INVESTMENT OR STRATEGY WILL BE PROFITABLE FOR A PARTICULAR CLIENT.

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

The Firm believes in goals-based fundamental investing. Fundamental investing involves the analysis of economic conditions, asset classes, sectors, and industries regarding financial quality metrics, valuation measures, management characteristics, and other qualitative and quantitative

characteristics to identify asset classes, sectors, industries, and/or companies that appear to be below fair market value. Once the asset class allocation has been determined, our Firm constructs client portfolios using a mix of individual stocks, bonds, ETFs, closed-end funds, and mutual funds to fill those asset classes. The Firm manages clients' assets through the direct purchase of securities and/or by investing in a variety of funds.

The Firm's investment approach begins with a clear and thorough understanding of each client's goals, objectives, time horizon, risk tolerance, risk profile, and income needs. In implementing our clients' investment strategy, we attempt to identify an appropriate ratio of major asset classes (equities, fixed income, and cash) that is appropriate for the Client's unique circumstances. The understanding of our clients and the targeted ratio of major asset classes are factored in when building portfolios for our clients. The Firm, as part of Modern Portfolio Theory, believes that the design of the portfolio as a whole is more important than the selection of any particular security. The Firm utilizes a long-term strategy when providing and implementing our advice. However, should a client's situation change or the basis for making an investment change, there are occasions where we will utilize a short-term strategy, and securities are held less than one year. Additionally, some client goals may be short-term in nature. Clients are responsible for informing the Firm when their circumstances change.

We use active and passive management strategies; however, the Firm strongly believes in the value of passive investing. Passive investment management is characterized by low portfolio expenses (meaning the funds in the portfolio have low expense ratios), minimal trading costs (due to reduced turnover), and increased tax efficiency (due to greater tax efficiency in passive funds and reduced turnover). In developing our investment strategies, especially as it relates to active management, our Firm conducts both quantitative and, for certain strategies and managers, qualitative reviews in an effort to identify leading investment strategies in each asset class offered. Quantitatively driven analysis focuses on performance, sources of returns, and consistency of risk-adjusted performance attributes. A subset of strategies identified through this process is then subjected to a more detailed quantitative and qualitative analysis. Qualitative considerations can include, for example, the size, tenure, evolution, and structure of the management team; the internal management processes and controls; and the history and growth of assets under management.

From time to time, a client may transfer a legacy asset to our Firm that may be retained due to portfolio fit and/or tax considerations, even though it may not have been vetted by the process described above. In such instances, we will continue to monitor those assets and provide advice to the client on the continued retention of those assets where appropriate.

Our Firm generally invests client cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper, and/or government backed debt instruments. Ultimately, our Firm tries to achieve the highest return on client cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our Firm may debit advisory fees for discretionary investment management services.

B. RISK OF LOSS

Clients must be aware that investing in securities involves risk of loss of the principal.

Every method of analysis has its own inherent risks. To perform an accurate market analysis, the Firm must have access to current/new market information. We have no control over the dissemination rate of market information; therefore, unbeknownst to us, certain analyses may be compiled with outdated market information, severely limiting the value of our analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Firm) will be profitable or equal any specific performance level(s). The Firm does not represent, warrant, or imply that its services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Notwithstanding the Firm's method of analysis or investment strategy, the assets within the client's portfolio are subject to risk of devaluation or loss. The client should be aware that there are many different events that can affect the value of the client's assets or portfolio including, but not limited to, changes in financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

All investment programs have certain risks that are borne by the investor. Our approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Prepayment Risk:** The returns on the collateral for the deal can change dramatically at times if the debtors prepay the loans earlier than scheduled.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

- **Business Risk:** This risk is associated with a particular industry or a particular company within an industry.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Risk Factors relevant to specific securities utilized include:

- **Equity Securities:** The value of the equity securities is subject to market risk, including changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. While offering greater potential for long-term growth, equity securities are more volatile and riskier than some other forms of investment.
- **Exchange Traded Funds ("ETF"):** ETFs are a recently developed type of investment security, representing an interest in a passively managed portfolio of securities often selected to replicate a securities index, such as the S&P 500 Index or the Dow Jones Industrial Average, or to represent exposure to a particular industry or sector. Unlike open-end mutual funds, the shares of ETFs and closed-end investment companies are not purchased and redeemed by investors directly with the fund, but instead are purchased and sold through broker/dealers in transactions on a stock exchange. Because ETF and closed-end fund shares are traded on an exchange, they may trade at a discount from or a premium to the net asset value per share of the underlying portfolio of securities. In addition to bearing the risks related to investments in equity securities, investors in ETFs intended to replicate a securities index bear the risk that the ETF's performance may not correctly replicate the performance of the index. Investors in ETFs, closed-end funds and other investment companies bear a proportionate share of the expenses of those funds, including management fees, custodial and accounting costs, and other expenses. Trading in ETF and closed-end fund shares also entails payment of brokerage commissions and other transaction costs.
- **Mutual Fund Shares:** Some of the risks of investing in mutual fund shares include: (i) the price to invest in mutual fund shares is the fund's per share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase (such as sales loads), (ii) investors must pay sales charges, annual fees, and other expenses regardless of how the fund performs, and (iii) investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.
- **Index Mutual Fund Shares:** Index Mutual Funds are a type of mutual fund or ETFs that seeks to track the returns of a market by index. A market index measures the performance of a mixture of securities representative of a sector of a stock market or of an economy. Index Mutual Funds generally follow a passive, rather than active, investment strategy, aiming to maximize returns over a period of time. However, some risks associated with Index Mutual Funds include: (i) lack of flexibility to react to price fluctuation in the securities within the index compared to a non-index mutual fund; (ii) tracking error when

the index fund does not perfectly track its index; and (iii) underperformance of the index due to the fees, expenses, trading costs, and tracking error associated with the index fund.

- **Municipal Bond Risk:** Municipal securities issuers may face local economic or business conditions (including bankruptcy) and litigation, legislation or other political events that could have a significant effect on the ability of the municipality to make payments on the interest or principal of its municipal bonds. In addition, because municipalities issue municipal securities to finance similar types of projects, such as education, healthcare, transportation, infrastructure and utility projects, conditions in those sectors can affect the overall municipal bond market. Furthermore, changes in the financial condition of one municipality may affect the overall municipal bond market. The municipal obligations in which clients invest will be subject to credit risk, market risk, interest rate risk, credit spread risk, selection risk, call and redemption risk and tax risk, and the occurrence of any one of these risks may materially and adversely affect the value of the client's assets or profits.
- **Fixed Income Securities Risk:** Prices of fixed income securities tend to move inversely with changes in interest rates. Typically, a rise in rates will adversely affect fixed income security prices. The longer the effective maturity and duration of the client's portfolio, the more the portfolio's value is likely to react to interest rates. Some fixed income securities give the issuer the option to call, or redeem, the securities before their maturity dates. If an issuer calls its security during a time of declining interest rates, we might have to reinvest the proceeds in an investment offering a lower yield, and therefore might not benefit from any increase in value as a result of declining interest rates. During periods of market illiquidity or rising interest rates, prices of callable issues are subject to increased price fluctuation.
- **Interval Mutual Funds:** While interval mutual funds may provide limited liquidity to shareholders by offering to repurchase a limited amount of shares on a periodic basis, there is no guarantee that clients will be able to sell all of their shares in any specific repurchase offer. Also, the offer to repurchase shares may be suspended or postponed by the investment sponsor. An investment in an interval fund involves a considerable amount of risk and it is possible to lose the total investment amount. An investment in a closed-ended interval mutual fund is suitable only for investors who can bear the risks associated with the limited liquidity of the shares and should be viewed as a long-term investment.

While this information provides a synopsis of the events that may affect a client's investments, this listing is not exhaustive. Although our methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Clients should understand that there are inherent risks associated with investing and **clients may suffer loss of all or part of the client's principal investment.**

C. **RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES**

CFG does not primarily recommend a particular type of security as our recommendations are unique to each client based on their needs, goals, and risk capacity. However, investments may

include, but are not limited to, individual stocks, bonds, exchange traded funds (“ETFs”), options, mutual funds, and other public and private securities or investments.

ITEM 9: DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose any legal or disciplinary events that are material to a client’s or prospective client’s evaluation of our advisory business or the integrity of the management of our Firm. **Neither the Firm nor any of its management persons have been involved in legal or disciplinary events that are related to past or present investment clients.** Our backgrounds are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching our Firm name or our CRD No. 328254.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

As a registered investment adviser, we are required to disclose when we, or any of our principals, have any other financial industry affiliations.

A. FINANCIAL INDUSTRY ACTIVITIES

CFG is not a registered broker/dealer and does not have an application pending to register as a broker/dealer. Furthermore, none of the Firm’s management or supervised persons is a registered representative of, nor has an application pending to register as a representative of, a broker/dealer.

B. FINANCIAL INDUSTRY AFFILIATIONS

CFG is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Adviser and does not have an application pending to register as such. Furthermore, the Firm’s management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

C. OTHER MATERIAL RELATIONSHIPS

CFG does not have any arrangements that are material to its business or its clients with a related person who is a broker-dealer, investment company, other investment adviser, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships other than those already disclosed herein.

However, in his individual capacity, Steven Conkin, the Owner and Chief Compliance Officer of CFG, is an independent insurance agent licensed to sell Life, Accident, Health, Variable Life, and Variable Annuity insurance products and may engage in product sales with clients. CFG is not an insurance agency, and any insurance recommendations are separate and apart from Mr. Conkin’s role with CFG. Any commissions Mr. Conkin receives through the sale of insurance policies do

not offset advisory fees the client may pay for investment management services from CFG. As Mr. Conkin will receive additional compensation for the sale of insurance products, this creates a conflict of interest. CFG mitigates this conflict of interest by ensuring the conflict of interest is properly disclosed to the client and ensure that our related persons follow our Firm policies and procedures related to its fiduciary duty to the clients and always putting the client's interest first. Furthermore, clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our Firm.

D. SELECTION OF OTHER ADVISERS

CFG does not recommend or select other investment advisers for our clients, nor do we have any other business relationships with other investment advisers that creates a material conflict of interest.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION OF CODE OF ETHICS

All employees of CFG must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, CFG has adopted a Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or the potential for or the appearance of such conflicts), and to establish reporting requirements and enforcement procedures relating to personal trading by CFG personnel. CFG's Code of Ethics specifically addresses professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, as well as establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Neither our Firm, nor its representatives, recommend or effect transactions in securities in which any related person may have material financial interest.

C. PROPRIETARY / SIMULTANEOUS TRADING

Our Firm, or its related persons, may buy or sell securities for its own accounts that it has also recommended to clients. However, any purchase or sale of a security by the Firm or its related person will be subject to the Firm's fiduciary duty to its clients. From time to time, investment advisers of the Firm may buy or sell securities for themselves at or around the same time as the Firm's clients. In any instance where similar securities are bought or sold, the Firm will uphold its fiduciary duty by always transacting on behalf of the client before transacting for its own benefit. The Firm will always document any transactions that could be construed as a conflict of interest.

To mitigate or remedy any conflict of interest or perceived conflict of interest, the Firm will monitor its proprietary and personal trading reports for adherence to its Code of Ethics. All related persons are expected to adhere strictly to these guidelines.

ITEM 12: BROKERAGE PRACTICES

A. SELECTION AND RECOMMENDATION

Our Firm does not maintain custody of client assets (although our Firm may be deemed to have custody of client assets if given the authority to withdraw assets from client accounts. Client assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. Our Firm recommends that clients use Altruist Financial, LLC (“Altruist”) a FINRA-registered broker-dealer, member of SIPC, and qualified custodian. Our Firm is independently owned and operated and not affiliated with Altruist. Altruist will hold client assets in a brokerage account in the client’s name and buy and sell securities when instructed. While our Firm recommends that clients use Altruist as custodian/broker, clients will decide whether to do so and, if so, clients will enter an account agreement directly with Altruist to open an account.

Our Firm seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. A wide range of factors are considered, including, but not limited to:

- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody).
- Capability to execute, clear, and settle trades (buy and sell securities for client accounts).
- Capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.).
- Breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.).
- Availability of investment research and tools that assist 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 them.
- Reputation, financial strength, and stability of the provider.
- Prior service to our Firm and our other clients.
- Availability of other products and services that benefit our Firm, as discussed below.

Altruist generally does not charge a separate fee for custodial services but is compensated by charging commissions or other fees to clients on trades that are executed or that settle into the brokerage account.

B. RESEARCH AND SOFT DOLLAR BENEFITS

CFG does not currently receive “soft dollars.”

Under “soft dollar” arrangements, brokerage firms would provide or pay the costs of certain services, equipment, or other items. These soft dollar benefits are attributed to the investment adviser by reducing its expenses; however, the amount of the fee paid to the investment adviser by the client would not be reduced. Making allocations to brokerage businesses with soft dollar arrangements could enhance the ability to obtain research, optimal execution, and other benefits on behalf of clients.

While CFG does not receive “soft dollars” from Altruist, Altruist offers certain support services to the Firm. More specifically, Altruist offers to reimburse CFG for the costs of certain technology solutions to help facilitate CFG’s practices and to streamline the Firm’s operations. The payments may be substantial and are based on CFG clients adding and/or transferring to and maintaining a certain amount in assets on Altruist’s platform should CFG choose to use these services. The benefits provided to or on behalf of CFG will not directly benefit client accounts. The fees CFG charges will not be reduced by the value of the support services received by CFG. Access to such economic benefits create a financial incentive for CFG to maintain client accounts through Altruist.

C. BROKERAGE FOR CLIENT REFERRALS

Our Firm does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

D. DIRECTED BROKERAGE

CFG offers investment management services through the custodial platform offered by Altruist. Altruist will provide custody, clearing, and execution services for CFG client accounts. By requiring clients to use Altruist as custodian, which CFG has approved, CFG seeks to achieve “best execution” of client transactions. CFG does not permit clients to direct the use of a particular brokerage firm. Clients may be able to direct brokerage with other advisers.

E. ORDER AGGREGATION

Our Firm may, at times, aggregate sale and purchase orders of securities (“block trading”) for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, lower commission expenses, or beneficial timing of transactions, or a combination of these and other factors. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. Our Firm may aggregate or “bunch” transactions for a client’s account with those of other clients in an effort to obtain the best execution under the circumstances.

F. TRADE ERROR POLICY

The Firm maintains a record of any trading errors that occur in connection with investment activities of its clients. The Firm will bear any losses due to trading errors. Gains generated as a

result from a trade error will either: (i) follow the custodian's policy; (ii) be credited to the client's account; or (iii) be donated to charity. The Firm does not retain any gains associated with trade errors.

ITEM 13: REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

The Firm reviews investment management clients' account activity with a formal review at least annually. The reviews consist of determining whether a client's investment goals and objectives are still aligned with the client's investment strategy. The Firm also reviews financial planning clients' financial plans with a formal review at least annually. The review consists of the inputs, assumptions, and other variables and are compared to prior plan results, recommendations, and advice. The reviews are overseen by Steven Conkin, Chief Compliance Officer.

B. INTERMITTENT REVIEWS

Intermittent reviews may be triggered by unusual performance, change in investment restrictions, market volatility, change in investment strategy, changes in the tax code, or changes in the client's circumstances. Clients should promptly notify the Firm of any material changes to their financial situation or investment objectives, or if other circumstances occur that might affect our Firm's investment advice, portfolio management or financial plan.

C. REPORTS

The Firm will provide clients with a consolidated written report at least on an annual basis. Clients also have access to trade confirmations from the qualified custodian, as well as custodian statements that are provided on at least a quarterly basis. The statements from the custodian will include a list of investment holdings and a description of activity in the account for the reporting period. In addition, the custodian provides tax documents to assist clients with their tax compliance filings. Clients are encouraged to review reports from our Firm as well as reports/statements from the custodian.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS FROM OTHERS

Our Firm receives economic benefits from Altruist in the form of the support products and services made available to our Firm and other independent investment advisers that have their clients maintain accounts at Altruist. These products and services, how they benefit our Firm, and the related conflicts of interest are described above (*see Item 12 – Brokerage Practices*). The availability of Altruist's products and services is not based on our Firm giving particular investment advice, such as buying particular securities for our clients.

B. CLIENT REFERRALS AND COMPENSATION TO UNAFFILIATED THIRD PARTIES

Our Firm does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. Furthermore, our Firm does not compensate any unaffiliated third parties for referrals.

ITEM 15: CUSTODY

A. CUSTODIAN OF ASSETS

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them. CFG has custody due to its authority to deduct advisory fees from client accounts. However, the Firm will not maintain physical possession of client funds and securities. Rather, client's funds and securities are held by a qualified custodian in accounts that are registered in the client's name.

While CFG does not have physical custody of client funds or securities, payments of the Firm's fees may be deducted by the custodian from the custodial brokerage account(s) which holds the client's funds pursuant to the client's account agreement. Prior to permitting the direct debiting of fees, each client must provide written authorization permitting fees to be paid directly from the custodian to the Firm.

Clients are encouraged to raise any questions with us about the custody, safety, or security of their assets and our custodial recommendations.

B. ACCOUNT STATEMENTS

While the Firm is the client's adviser, as part of the billing process, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period, on at least a quarterly basis. It is important for clients to carefully review their custodial statements carefully and compare asset values, holdings, and fees to the account statement issued for the previous period. At its sole discretion, the Firm may send other updates or periodic reports, as it deems appropriate, to clients. Clients should contact the Firm directly if they believe that there may be an error in their account statement.

ITEM 16: INVESTMENT DISCRETION

It is the Firm's customary procedure to have full discretionary authority that allows our firm to transact portfolio securities accounts on behalf of clients. Discretionary authority is granted either by the advisory agreement and/or by a separate limited power of attorney where such document is required.

Other than advisory fees due to the Firm, which the Firm will receive directly from the Custodian, the Firm's discretionary authority does not grant us the authority to take or have possession of any

assets in the client's account or to direct delivery of any securities or payment of any funds held in the account to the Firm. Furthermore, the Firm's discretionary authority by agreement does not allow it to direct the disposition of such securities or funds to anyone except the account owner.

By granting our Firm investment discretion, our Firm has the authority to determine, without obtaining specific client consent, the securities to be bought or sold and the amount of the securities to be bought or sold in accordance with the client's stated investment objectives. The Firm's discretionary authority regarding investments may, however, be subject to certain limitations. These limitations are recognized as the restrictions and prohibitions placed by the Client on transactions in certain types of business or industries. All such restrictions are to be agreed upon in writing at the inception of the account.

ITEM 17: VOTING CLIENT SECURITIES

CFG does not vote nor advise clients how to vote proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Our Firm does not give any advice or take any action with respect to the voting of these proxies. For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts.

From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. The Firm has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. The Firm also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the Firm has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by clients.

Where the Firm receives written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by a client, we will forward all notices, proof of claim forms and other materials, to the client. For clients who have authorized electronic communication from the Firm, we will forward the notices, proof of claim forms and other materials to the client via electronic mail, where appropriate.

ITEM 18: FINANCIAL INFORMATION

A. BALANCE SHEET REQUIREMENT

Our Firm is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client and six months or more in advance.

B. FINANCIAL CONDITION

Our Firm does not have any financial impairment that will preclude the Firm from meeting contractual commitments to clients.

C. BANKRUPTCY PETITION

Our Firm meets all net capital requirements that it is subject to, and the Adviser has not been the subject of a bankruptcy petition in the last 10 years.

ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Please refer to the Form ADV Part 2B (“Brochure Supplement”) for background information about our Firm’s principal executive officers, management personnel, and those giving advice on our Firm’s behalf. Please refer to Item 10 of this Firm Brochure for information regarding our Firm’s outside business activities. Our Firm does not receive performance-based fees. Neither our Firm nor any of our management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings, or administrative proceedings. Neither our Firm nor its management persons have any relationships or arrangements with any issuers of securities.

A. BACKGROUNDS OF PRINCIPAL OFFICERS

The education and business background of the Firm’s Chief Compliance Officer and Investment Adviser Representative, Steven Conkin, can be found in his Form ADV Part 2B (“Brochure Supplement”).

B. OTHER ACTIVELY ENGAGED BUSINESSES BY FIRM OR ITS PERSONNEL

Other business activities for each relevant individual can be found on the ADV Part 2A Brochure Supplement for each such individual and set forth in Item 10 of this Disclosure Brochure.

C. PERFORMANCE-BASED FEES

CFG 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.

D. MATERIAL DISCIPLINARY DISCLOSURES OF MANAGEMENT PERSONS

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. OTHER MATERIAL RELATIONSHIPS

There are no additional relationships or arrangements to report under this section.

PRIVACY POLICY

An important part of the relationship we have with our clients is the information they share with us. We want each client to know how we treat their private information. We keep personal information such as social security numbers and account balances confidential. We take steps to safeguard this data from anyone who should not have access to it. We do not sell this information to anyone. In dealing with Conkin Financial Group, Inc., clients can expect that we will take the steps outlined below to keep all their information confidential and secure.

OUR PRIVACY POLICY

In providing financial services and products to our clients, we collect certain non-public information about them. Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to our clients, or as permitted by law. Protecting your privacy is important to us.

INFORMATION WE COLLECT

The non-public personal information we have about clients includes what they give us when opening an account or communicating with us. This could include:

- Name and address
- Social Security Number
- Investment objectives and experience
- Financial circumstances
- Employment history
- Account balance and account transactions

HOW WE SHARE YOUR PERSONAL INFORMATION

We do not sell personal client information to anyone.

Affiliates. We may share personal information about you with our affiliated companies for everyday business purposes, however, our affiliated companies are not permitted to use this information to market their products or services to you.

We do not disclose personal information about our clients to non-affiliated third parties, without expressed written consent. We may disclose anonymous information that cannot be linked to an individual client on occasion, but only to companies that we hire to help us provide products and services to our clients, or as required by law, or as authorized by the client personally, or as otherwise described in this Privacy Policy.

Service Providers. Companies and individuals that provide services on our behalf or help us operate our services and business (such as IT, hosting, investment trading, customer relationship management and support, print and mail fulfillment, data management, email delivery, etc.).

Service-Related Third Parties. Brokers, custodians, administrators, transfer agents, investment funds and their respective managed and other non-affiliated third parties as necessary to provide our services to you.

HOW INFORMATION IS USED

We use your personal information for the following purposes:

Service Delivery. We use your personal information to provide, operate, and improve the Service; execute your transactions; provide support for the service; and respond to your inquiries, questions and feedback.

Compliance and Operations. We may use your personal information to: comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities; protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); audit our internal processes for compliance with legal and contractual requirements and internal policies; and prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

HOW INFORMATION IS SAFEGUARDED

We have procedures in place that we believe are reasonably designed to protect the security and confidentiality of client information. These include confidentiality agreements with companies we hire to help us provide services to clients, password-protected user access to our computer files, and strict confidentiality policies that apply to all Firm personnel, vendors, and contractors.

YOUR DATA CHOICES

You have the following choices with respect to your personal information:

Decline to provide information. We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

How to contact us. You can reach us in the following ways:

- Office Location: 1616 E. 19th St., Suite 404, Edmond, OK 73013
- Email: steve.conkin@conkinfinancial.com
- Phone: (405) 348-6200



Conkin Financial Group, Inc.

1616 E. 19th Street, Suite 404
Edmond, Oklahoma 73013
(405) 348-6200
www.conkinfinancial.com

ADV Part 2B – Brochure Supplement

Effective: November 28, 2023

Steven Conkin, CFP[®]

Chief Compliance Officer and Investment Advisor Representative
Individual CRD No. 3230634

This Form ADV Part 2B (“Brochure Supplement”) provides information about Steven Conkin that supplements Conkin Financial Group, Inc’s (“Firm,” “we,” “us”) Form ADV Part 2A (“Firm Brochure”). You should have received a copy of the Firm Brochure. If you did not receive our Firm Brochure or if you have any questions about the contents of this Brochure Supplement, please contact us by telephone at (405) 348-6200 or by email at steve.conkin@conkinfinancial.com.

Additional information about Steven Conkin is available on the SEC’s website at www.adviserinfo.sec.gov. The site is searchable by a unique identifying number known as a CRD number. Steven Conkin’s CRD number is 3230634.

Item 2: Education Background and Business Experience

Steven Conkin

CRD No. 3230634

Born: 1976

Educational Background

2001; Oklahoma State University; Master of Business Administration

1999; Oklahoma State University; Bachelor of Science in Business Administration, Finance

Business Experience

11/2023 – Present	Investment Adviser Representative & Chief Compliance Officer	Conkin Financial Group, Inc.
03/2011 – Present	President	Conkin Financial Group, Inc.
10/2017 – 11/2023	Investment Advisor Representative & Registered Representative	Woodbury Financial Services, Inc.
01/2011 – 10/2017	Registered Representative	Voya Financial Advisors, Inc.

Professional Designations

Certified Financial Planner, CFP®

The CFP® certification is obtained by completing an advanced college-level course of study addressing the financial planning subject areas that the CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, passing a comprehensive certification exam, and agreeing to be bound by the CFP® board's Standard of Professional Conduct. As a prerequisite, the individual must have a bachelor's degree from a regionally accredited United States college or university (or foreign university equivalent) and have at least 3 years of full-time financial planning experience (or equivalent measured at 2,000 hours per year). This designation requires 30 hours of continuing education every 2 years and renewing an agreement to be bound by the Standards of Professional Conduct.

Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. The ChFC® is issued by The American College, which is accredited by the Commission on Higher Education of the Middle States Association of Colleges and Schools. The ChFC® is issued to professionals who have three (3) years of full-time business experience within the five (5) years preceding the awarding of the designation. The designee is then required to complete nine (9) required and three (3) elective college-level courses from The American College. The required course of study includes insurance and financial planning, income taxation, planning for retirement needs, investments, and estate planning. The average study time to earn the ChFC® exceeds 450 hours. Designees must then pass

a series of written examinations as well as attest and adhere to The American College's Code of Ethics. In addition, the designee is required to complete 30 hours of continuing education every two years through The American College.

Item 3: Disciplinary Information

Steven Conkin does not have any legal, civil, or disciplinary events to disclose. Steven Conkin has never been involved in any investment related regulatory, civil, or criminal action. Steven Conkin has not received any client complaints, lawsuits, arbitration claims, or administrative proceedings.

Securities laws require investment advisers to disclose any instances in which the investment adviser or its advisory persons were liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices.

However, our Firm encourages you to independently view Steven Conkin's background on the Investment Adviser Public Disclosure website ("IAPD") by searching with his full name or his individual CRD 3230634.

Item 4: Other Business Activities

Steven Conkin is licensed to sell Life, Accident, Health, Variable Life, and Variable Annuity insurance products and may engage in product sales with clients, for which he will receive additional compensation. Any commissions received through the sales of insurance policies do not offset advisory fees the client may pay for investment management or financial planning services offered by Conkin Financial Group, Inc. Clients are not required to purchase insurance products from Mr. Conkin and may seek similar services elsewhere. This is an investment related activity. Mr. Conkin does not actively prospect insurance business.

Item 5: Additional Compensation

Steven Conkin does not receive any economic benefit from any person, company, or organization, other than our Firm in exchange for providing advisory services through our Firm. However, Mr. Conkin may receive commissions from sales of insurance products generated as an insurance agent.

Item 6: Supervision

Steven Conkin supervises himself in his capacity as our Firm's Chief Compliance Office. To this end, we have implemented a Compliance Manual and Code of Ethics that guides Conkin Financial Group, Inc. and its supervised persons in meeting their fiduciary obligations to clients when providing investment advisory services. As our Chief Compliance Officer, Steven Conkin is responsible for implementing the Compliance Manual and Code of Ethics. Steven Conkin may be contacted at (405) 348-6200.

Our Firm is also subject to regulatory oversight by various agencies. These agencies require registration by the Firm and its supervised persons. As a registered entity, our Firm is subject to examinations by regulators, which can be announced or unannounced. We are required to periodically update the information provided to these agencies and to provide various reports regarding its business activities and assets.

Item 7: Requirements for State-Registered Advisors

Steven Conkin has not been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.