

Item 1 Cover Page

Part 2A of Form ADV

Firm Brochure

Plan Group Financial, Inc.

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This brochure provides information about the qualifications and business practices of Plan Group Financial, Inc. If you have any questions about the contents of this brochure, please contact us at (405) 848-1099. 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 Plan Group Financial, Inc. is available on the SEC's website at www.adviserinfo.sec.gov

Please note that registration as an investment advisory firm does not imply a certain level of skill or training.

Item 2 Material Changes

We have made no material changes since our last filing dated March 2019.

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Item 4 Advisory Business

About the Firm

Plan Group Financial, Inc. is an investment advisory firm located in Oklahoma City, OK. We previously did business as Onstott & Associates, Inc. We offer investment management services and financial consulting services to you, our clients.

Our owner is Douglas Claycomb. We began our business in 1996.

About our Services

Plan Group Financial, Inc., (the “Company,”) offers investment advisory services to its customers through Asset Allocation and Investment Consultations as described below.

We provide our services based on your goals and objectives. Those goals and objectives are determined using a written questionnaire or through personal interviews and our services are tailored to your individual needs based upon those questionnaires and/or interviews.

For our financial consulting services, we will consult with you to help you decide upon a reasonable set of investment objectives. We typically then prepare a written asset allocation plan.

Should you wish to implement your investment plan, we may recommend you use our investment supervisory services. Based on your investment objectives, we will select investments and transfer your existing assets into appropriate asset classes. We may elect to use the services of third- party managers whose asset management services fit the needs of our clients. In these instances, we will share a percentage of our collected fee with those third-party managers. We retain the ability to hire and fire any third-party managers.

In some circumstances we offer our investment supervisory services as a sub-advisor to an unaffiliated third party. In those cases, our clients and the sub-advisory clients may receive the same or different advice and may hold the same or different investments.

Once your assets are invested, we periodically review your portfolio and make recommendations regarding your allocation or reallocation.

Subject to any written guidelines, which you may provide, we will be granted discretion and authority to manage the account. Accordingly, we are authorized to perform various functions, at your expense, without any further approval from you. Such functions include the determination of securities to be purchased/sold and the amount of securities to be purchased/sold.

For some clients, we may arrange for their income taxes to be completed by the firm with which we share office space. This is a benefit that some clients receive, and others do not. Clients are under no obligation to have their taxes completed by a firm we recommend or through which we facilitate your tax filings.

Clients may impose restrictions on investing in certain securities or types of securities.

We manage client assets. As of December 31, 2019 , our discretionary assets under management were \$101,746,491.

Item 5 Fees and Compensation

Client fees are payable monthly, in arrears, based upon a percentage of assets under management. The annual percentage rate fee schedule is listed below. All fees are negotiable.

Fees. For the services rendered to Client by Plan Group, Client agrees that it shall pay the following fees monthly, in arrears, for all assets under management:

<u>Assets Under Management</u>	<u>Annual Fee Percentage</u>
\$ 0 - \$250,000	2.00% per annum*
\$ 250,001 - \$1,000,000	1.75% per annum*
\$1,000,001 - \$5,000,000	1.50% per annum*
\$5,000,001 and above	Negotiated

**All fees can be negotiated between Plan Group Financial and client with no fee being greater than the above schedule.*

. Fees are calculated as follows: Total Assets Under Management at the end of month, by Annual Fee Percentage divided by 12 = Monthly Fee.

Additional deposits to the account are subject to the same fee procedures. No fee adjustments will be made for partial withdrawals and account depreciation.

Clients can terminate, without penalty, the Adviser's Agreement within five business days. Thereafter, either of us may serve written notice to terminate. You will have the opportunity to place reasonable restrictions on the types of investments. Either of us may terminate the advisory agreement by providing written notice. We will not accept instructions to terminate the agreement unless you provide those instructions in writing.

As a sub-advisor, we receive a portion of the advisory fee collected by the third-party advisor.

Several of our advisory representatives are also registered representatives of Saxony Securities, Inc., ("Saxony"). Through Saxony, they will receive compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. If you elect to purchase securities through these representatives in their role as registered representatives, this will not occur in advisory accounts of Plan Group Financial, Inc. but rather in brokerage accounts held at Saxony Securities, Inc.

This presents a conflict of interest as it gives our advisory representatives incentives to recommend investment products based on the compensation received, rather than on your needs. To address this conflict, our advisory representatives will only receive compensation for the sale of securities or other investment products when selling securities at Saxony, and not for accounts advised by Plan Group Financial, Inc.

In addition to our advisory fees, you may pay additional fees associated with our advice, such as custodial fees and mutual fund fees. You will incur brokerage and other transaction costs. More information about our suggested custodian is in Item 12 of this document. You should review your agreement with the custodian carefully for more information about Schwab's fees and services.

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

We do not accept performance-based fees.

Item 7 Types of Clients

We typically work with individuals, trusts, estates, and other businesses. We have no minimum account size.

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

Investing involves risks, that you should be prepared to bear. You may lose some or all of your money.

We advise individual clients regarding the investment management of mutual funds. Investment strategies and policies of those funds as well as risks are included and described in the relevant prospectus and registration statement.

We use the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

We also use information provided to us by Frontier Analytics to aid us in analyzing securities.

We typically use the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

Our methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks.

Our primary investment strategies - Long Term Purchases and Short Term Purchases are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

Item 9 Disciplinary Information

Neither the Firm nor any of our management persons have been involved in any events that are material to a client's or prospective client's evaluation of the Firm or the integrity of its management.

Item 10 Other Financial Industry Activities and Affiliations

Several of our advisory representatives are also registered representatives of Saxony Securities, Inc., ("Saxony"). Through Saxony, they will receive compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. If you elect to purchase securities through these representatives in their role as registered representatives, this will not occur in advisory accounts of Plan Group

Financial, Inc. but rather in brokerage accounts held at Saxony Securities, Inc.

This presents a conflict of interest as it gives our advisory representatives incentives to recommend investment products based on the compensation received, rather than on your needs. To address this conflict, our advisory representatives will only receive compensation for the sale of securities or other investment products when selling securities at Saxony, and not for accounts advised by Plan Group Financial, Inc.

You have the option to purchase investment products through other brokers or agents not affiliated with our firm. These activities create a conflict of interest in that our associates have financial incentives to recommend additional products or services to you. We address these conflicts by doing the following:

We must disclose any potential or actual conflicts of interest when dealing with clients.

We are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and,
- A duty to be loyal to clients.

Clients always have the option of purchasing recommended investment and insurance products through other broker-dealers.

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

We do not, as principals, buy securities for our own accounts from any client or sell securities we own to any client or as a broker or agent effect securities transactions for compensation for any client. Plan Group and persons associated with us are allowed to invest for their own accounts or have a financial interest in the same securities or other investments that we acquire for your account.

Because we engage in transactions that are substantially the same as those made for client accounts, conflicts of interest are substantially reduced but still exist. We recognize the fiduciary responsibility to place your interests first and have established policies in this regard to avoid any potential conflicts of interest.

As a fiduciary, we have a duty of utmost good faith to act solely in the best interests of each of our clients. Our clients entrust us with their funds, which in turn places a high standard on our conduct and integrity. Our fiduciary duty compels all employees to act with the utmost integrity in all our dealings. This fiduciary duty is the core principle underlying this Code of Ethics and Personal Trading Policy, and represents the expected basis of all our dealings with our clients.

We have adopted a Code of Ethics for the purpose of instructing our personnel in their ethical obligations and to provide rules for their personal securities transactions. The Advisor and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligations to adhere not only to specific provisions of the Code but to general principles that guide the Code.

The Code covers a range of topics that may include: general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting

ethical violations, distributions of the Code, review and enforcement processes, amendments to form ADV and supervisory procedures. The Advisor will provide a copy of the Code to any client or prospective client upon request.

Item 12 Brokerage Practices

We do not receive any research or other products or services other than execution from a broker-dealer or third party in connection with your securities transactions. Nor do we receive any client referrals from a broker-dealer or third party.

We suggest clients utilize Schwab Institutional, the institutional division of Charles Schwab & Co., Inc., (“Schwab”), a registered broker-dealer for custody of their assets and to effect trades for their accounts. We are independently owned and operated and not affiliated with Schwab. We have selected Schwab as it has been working independent investment advisory firms like ours for close to 20 years. By serving as custodian for client assets managed by independent advisory firms, Schwab Institutional offers an infrastructure that helps advisors to be independent Schwab provides us with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor’s client’s assets is maintained in accounts at Schwab Institutional, it is not otherwise contingent upon us committing to Schwab any specific amount of business (assets in custody or trading) Schwab’s services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For your accounts maintained in its custody, Schwab generally does not charge separate fees for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle in Schwab accounts.

Schwab makes available to us other products and services that benefit us but may not benefit your accounts. Some of these products and services assist us in managing and administering your accounts. These include software and other technology that provides access to your account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of our fees from your accounts; and assist with back-office functions, recordkeeping, and client reporting.

Many of these services are used to service all or most of our accounts, including accounts not maintained at Schwab. Schwab also makes available to us other services intended to help us manage and further develop our business enterprise. These services may include consulting, publications and conference on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange, or pay for these types of services rendered to us by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or will pay all or part of the fees of a third-party providing these services to us.

While as a fiduciary, we endeavor to act in your best interests, our recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a conflict of interest.

You are responsible for all fees and/or expenses charged by the custodian of your assets. You may pay fees more expensive than those obtainable from other custodians in return for these services. If you direct us to manage assets with a specific broker/dealer or custodian, you have the sole responsibility for negotiating commission rates and other costs. If you select a specific broker/dealer or custodian, we will not be required to effect any transaction through them if we reasonably believe that to do so may result in a breach of our fiduciary duty.

We may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account. We engage in block trading when it is consistent with the duty to seek best execution and is consistent with the terms of our investment advisory agreements.

Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day.

Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. We may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

Item 13 Review of Accounts

We furnish performance measurement services to you in the form of annual evaluation reports. The reports show how your accounts have varied in value and composition. You are invited to the office for an annual meeting. The level of the specifics involved in the review of accounts is determined by how volatile the investments are in the portfolio. The accounts are reviewed by the Principal Officer of the Company, Douglas Claycomb.

Item 14 Client Referrals and Other Compensation

We do not pay anyone for client referrals for our accounts. As a sub-advisor, we receive compensation for managing customer accounts. The unaffiliated advisor collects the fee and shares a portion of the collected fee with us for our services.

Item 15 Custody

We have custody of client funds in that we deduct fees from your accounts. The qualified custodian of your assets, typically Schwab, sends monthly statements directly to you. You should carefully review those statement and compare them to any statements you receive from us. We will also send you an invoice at the time we deduct fees. You should review these invoices carefully.

Item 16 Investment Discretion

We request that you give us discretionary authority to manage your accounts by signing a written power of attorney. You may place reasonable restrictions on the types of securities or on specific securities that we may purchase or sell.

Item 17 Voting Client Securities

We do not vote proxies on your behalf. You retain that right unless you make other arrangements with the custodian of your assets. You will receive proxies or other solicitations directly from the custodian of your assets. You may contact us with questions about proxies.

Item 18 Financial Information

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you.

Item 19 Requirements for State-Registered Advisors

Douglas Claycomb **DOB:** 11/25/1980

Education

Oklahoma City University 2003- BS Business

Business Background

Merrill Lynch 04/04 - 06/06
Financial Advisor

Signal Securities, Inc. 03/08 - 07/11

FSC Securities Corporation 07/11 - 09/12

St. Bernard Financial Services, Inc. 09/13 – 04/15

Saxony Securities, Inc. 06/15 -Present

Plan Group Financial, Inc. (Formerly known as Onstott & Associates, Inc.)

Operations and Financial Advisor 06/06 - 03/2017

President/Chief Compliance Officer 03/17 - Present

