

**Silver Oak Securities, Inc.**  
Registered Investment Adviser  
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Form ADV Part 2B  
Brochure Supplement  
November 15, 2021

This brochure supplement provides information about Andrew D Martin that supplements the Silver Oak Securities, Inc. Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact Mr. Doug Baxley at (731) 668-3825 if you did not receive Silver Oak Securities, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Andrew D Martin is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Educational Background and Business Experience**

Name: Andrew D Martin

Year of Birth: 1960

### **Educational Background:**

Belmont University, BBA, Economics, 1982

Vanderbilt University, MLAS, 2006

### **Business Background:**

Silver Oak Securities Inc., Registered Representative and Investment Advisor Representative, 11/2017 to Present

Portfolio Investment Advisors, Owner, 11/2017 to Present

7Twelve Advisors, LLC, Co-founder, President, 11/2008 to Present

Girard Securities, Registered Principal, 07/2008 to 10/2017

## **Item 3 Disciplinary Information**

Andrew D Martin has no disciplinary information to disclose.

## **Item 4 Other Business Activities**

Your Financial Professional is actively engaged as a registered representative of Silver Oak Securities, Inc. In this capacity, they have a conflict of interest when recommending Silver Oak Securities, Inc. over other investment advisors and broker/dealers because they are licensed as a Registered Representative with Silver Oak Securities, Inc. and can only receive fees or commissions from clients when clients use the programs available through Silver Oak Securities, Inc. Silver Oak Securities, Inc. has placed certain limitations on their advisory and investment activities. A conflict of interest may arise as these commissionable securities sales may create an incentive to recommend products based on the compensation instead of acting as an investment adviser. It may not necessarily be in the best interests of the client.

Your Financial Professional is actively engaged as an insurance agent. In this capacity, they may receive commissions for the recommendation/sale of insurance products. The receipt of this compensation may affect their judgment when recommending insurance products to clients. While they endeavor at all times to put the interest of clients first as a part of Silver Oak Securities, Inc.'s fiduciary duty, you should be aware that the receipt of commission and additional compensation itself creates a conflict of interest and may affect their judgment when making recommendations. Your Financial Professional attempts to control for this conflict by recommending insurance products based on the individual needs of clients first and then considering any commissions they may earn for selling the insurance policy.

Your Financial Professional is actively engaged as the owner of an independent Registered Investment Adviser ("RIA"), 7Twelve Advisors, LLC. Your Financial Professional provides institutional advisory services through this RIA. Silver Oak and the independent RIA are not affiliated entities.

## **Item 5 Additional Compensation**

Certain product sponsors provide your Financial Professional with economic benefits as a result of your Financial Professional's recommendation or sale of the product sponsors' investments. These other products and services can benefit Silver Oak Securities, Inc. ("SOSI") and/or your Financial Professional but may not benefit you. The economic benefits received can include but are not limited to, financial assistance or the sponsorship of national or regional conferences, client meetings or other events. It can also include educational sessions, marketing support, payment of travel expenses, occasional business entertainment, including meals, virtual entertainment and

invitations to sporting events, including golf tournaments, educational opportunities and tools to assist your Financial Professional in providing various services to clients. These services can include but are not limited to, software and other technology (and related technological training) that provide access to client 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 fees from clients' accounts, and assist with back-office training and support functions, record-keeping and client reporting. Some of these services may be used to service all or some substantial number of accounts, including those that are not specifically maintained by an individual product sponsor. These services are intended to help manage and further develop the business of SOSI and your Financial Professional and can include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. Some product sponsors may make available, arrange and/or pay vendors for these types of services or discount or waive fees it would otherwise charge. These economic benefits may be received directly by your Financial Professional or indirectly through SOSI who have entered into specific arrangements with product sponsors. A recommendation/requirement that clients maintain their assets in accounts based in part on the benefit to your Financial Professional or SOSI or the availability of some of these products and services and other arrangements and not solely on the nature, cost or quality of custody services provided create a potential conflict of interest. These economic benefits could influence your Financial Professional to recommend certain products/programs over others.

#### **Item 6 Supervision**

Andrew D Martin is supervised by Doug Baxley, Chief Compliance Officer of Silver Oak Securities, Inc. Firm policies and procedures have been designed to ensure appropriate recordkeeping and supervision, and all Financial Professionals are required to adhere to our firm's Code of Ethics and procedural guidelines. Mr. Baxley, as Chief Compliance Officer, will monitor firm activities and the advice provided by performing the following ongoing reviews:

- Account opening documentation when the relationship is established
- Review of account transactions
- Assessments of the client's financial situation, objectives, and investment needs
- A review of client correspondence on an as needed basis
- Periodic internal firm review

Questions relative to the firm, its services or this brochure supplement may be made to the attention of Mr. Baxley at (731) 668-3825.