

Haberling Financial Group

Brochure

(Part 2A of Form ADV)

Haberling Financial Group, Inc.

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This brochure provides information about the qualifications and business practices of HABERLING FINANCIAL GROUP, INC. If you have any questions about the contents of this brochure, please contact Haberling Financial Group, Inc. 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 HABERLING FINANCIAL GROUP, INC. is available on the SEC's website at www.adviserinfo.sec.gov

Updated 3/28/11

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 509-735-7507 or by email at: info@hfginvest.com

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Advisory Business

Firm Description

Haberling Financial Group, Inc. was founded in 1983.

HABERLING FINANCIAL GROUP, INC. provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client to determine financial objectives after which the consulting may include identification of financial problems, retirement planning analysis, portfolio management, estate planning, tax planning, insurance planning and education funding.

HABERLING FINANCIAL GROUP, INC. works as a fiduciary with its investment advisory clients.

HABERLING FINANCIAL GROUP, INC. is primarily a fee-based financial planning and investment management firm. The firm does not sell commissionable annuities and insurance nor does it recommend the purchase of stocks, bonds, non-traded REITs or limited partnerships for a commission. The firm provides planning services and portfolio management. The firm is affiliated with Pacific West Securities, Inc. a broker-dealer. The primary purpose for the relationship with Pacific West Securities, Inc. is to collect service fees from mutual funds for small non-advisory clients and 401k plans. The client relationships with Pacific West Securities, Inc. are legacy accounts that were primarily established prior to the firm converting to a fee based financial planning firm. The firm converted to fees from commissions in 1998. **The firm does not pay finder's fees to other professionals or to clients for referrals.**

Investment advice is an integral part of financial planning. In addition, HABERLING FINANCIAL GROUP, INC. advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

The firm provides investment management by assisting the client with selecting one of five investment models. The models are labeled 1-5, 5 being the highest risk and return. The firm consults with the client and makes a recommendation as to which model is appropriate based upon factors such as: client's objective, client's time horizon, client's return objective, client's experience, client's risk tolerance and a present value calculation to determine if the client is on track for retirement. The client makes the final decision as to their model selection. HABERLING FINANCIAL GROUP, INC. does not act as a custodian of client assets. The client always maintains asset control. HABERLING FINANCIAL GROUP, INC. places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or a financial plan. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client and to determine whether the client and the firm are a compatible fit.

Principal Owners

Ty Haberling is an 80% stockholder. Ben Messinger and T. Michael Tallman are 10% stockholders each.

Types of Advisory Services

HABERLING FINANCIAL GROUP, INC. provides investment advisory and wealth management services.

On more than an occasional basis, HABERLING FINANCIAL GROUP, INC. furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 12/31/2010, HABERLING FINANCIAL GROUP, INC. manages approximately \$230,000,000 in assets for approximately 475 clients. Approximately 99% of all relationships are managed on a discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of their wealth management objectives.

The financial plan may include, but is not limited to:

- Net worth and cash flow statement

- Determine appropriate asset allocation plan
- Review of all investment accounts
- Review of income tax return
- Review of insurance needs
- Prepare multiple retirement and contingency planning scenarios
- Estate planning review
- Review of Education Funding Analysis.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. A financial planning fee will be disclosed prior to engagement and is negotiable. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month.

Advisory Service Agreement

Most clients choose to have HABERLING FINANCIAL GROUP, INC. manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes services referenced in the above Financial Planning Agreement as well as quarterly performance reporting and client meetings.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

- 1.00% on the first \$500,000;
- 0.80% on the next \$500,000 (from 500,001 to 1,000,000); and
- 0.60% on the assets above \$1,000,000.

The minimum annual fee is \$1,000. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Retainer Agreement

In some circumstances, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement* when it is more appropriate to work on a fixed-fee basis. The annual fee for a *Retainer Agreement* is determined after the scope of the work has been determined and is *NEGOTIABLE*.

Hourly Planning Engagements

HABERLING FINANCIAL GROUP, INC. provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements ranges from \$100 hour for non-advisor staff and \$250 hour for certified financial planning staff. The actual hourly rate will be disclosed in advance of the work and is dependent upon which advisor is performing the work.

Asset Management

Assets are invested primarily in no-load or load waived mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a clearing fee for stock and bond trades. HABERLING FINANCIAL GROUP, INC. does not receive any portion of the clearing fees. HABERLING FINANCIAL GROUP, INC. may receive 12b1 fees for certain mutual funds.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through HABERLING FINANCIAL GROUP, INC.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying HABERLING FINANCIAL GROUP, INC. in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, HABERLING FINANCIAL GROUP, INC. will refund any unearned portion of the advance payment.

HABERLING FINANCIAL GROUP, INC. may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, HABERLING FINANCIAL GROUP, INC. will refund any unearned portion of the advance payment.

Fees and Compensation

Description

HABERLING FINANCIAL GROUP, INC. bases its fees on a percentage of assets under management, hourly charges, fixed fees and 12b1 fees.

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are *NEGOTIABLE*.

Fee Billing

Investment management fees are billed quarterly, in *ARREARS*, meaning that we invoice you *AFTER* the three-month billing period has *ENDED*. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed in advance, with the balance due upon delivery of the financial plan. The firm will not collect more than \$1,000 in advance.

Other Fees

Custodians may charge transaction/clearing fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

HABERLING FINANCIAL GROUP, INC., in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future

earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Expense Ratios of Mutual Funds and Exchange Traded Funds

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to HABERLING FINANCIAL GROUP, INC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted. The firm attempts to use mutual funds and exchange traded funds with low operating expenses in most instances. There are occasions where the firm believes it is beneficial to use a fund that has higher than normal operating expenses. This is the exception and not the rule.

Past Due Accounts and Termination of Agreement

HABERLING FINANCIAL GROUP, INC. reserves the right to stop work on any account that is more than 30 days overdue. In addition, HABERLING FINANCIAL GROUP, INC. reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in HABERLING FINANCIAL GROUP, INC.'s judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 30 days.

Performance-Based Fees

HABERLING FINANCIAL GROUP, INC. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment or portfolio that may carry a higher degree of risk to the client.

Types of Clients

Description

HABERLING FINANCIAL GROUP, INC. provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations and business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$1,000,000 of assets under management, which equates to an annual fee of \$9,000.

HABERLING FINANCIAL GROUP, INC. has the discretion to waive the account minimum.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

The firm's primary method of analysis is fundamental and quantitative.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that HABERLING FINANCIAL GROUP, INC. may use include Morningstar Principia mutual fund information, Morningstar Principia stock information and Standard & Poor's.

Investment Strategies

Haberling Financial Group's portfolio management strategy utilizes a core and satellite approach. This means that we use managed and indexed global large cap mutual and exchange-traded funds as the core investments, and then add actively-managed funds where we believe there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets. The firm uses a multi-asset class approach. This means that we use fixed income, equities, real estate, commodities and hedging strategies to manage risk.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations and executed by the selection of one of five models called HFG Model 1 to HFG Model 5. Model 1 is the lowest risk and Model 5 is the highest risk. The client may change Model strategy with written confirmation.

In some instances Haberling Financial Group has created a customized portfolio consistent with the client's objective.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment 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 any investment security 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 today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **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:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it. This lengthy process must be completed before a profit can be generated. The drilling company carries a higher business risk than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **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.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Affiliations

The firm's advisors are registered with Pacific West Securities, Inc. (PWS) as registered representatives. As stated earlier in section FIRM DESCRIPTION the primary purpose for the affiliation with PWS is to collect service fees and commissions from legacy relationships that have not converted to a fee based relationship. **The firm doesn't actively seek new commission relationships.**

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

Code of Ethics

The employees of HABERLING FINANCIAL GROUP, INC. have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

Participation or Interest in Client Transactions

HABERLING FINANCIAL GROUP, INC. and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the HABERLING FINANCIAL GROUP, INC. *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of HABERLING FINANCIAL GROUP, INC. is Ty Haberling. He reviews all employee trades each quarter. His trades are reviewed by Steve Palm. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Conflicts of Interest

HABERLING FINANCIAL GROUP, INC. (THE FIRM) has three primary potential conflicts of interest. First, Mr. Haberling is a significant shareholder and director of a community bank located in the Tri-Cities named Community First Bank. Mr. Haberling receives approximately \$5,000 per year in director fees that are based upon his meeting attendance. Even though Mr. Haberling is not paid for referring individuals to the bank there is a potential conflict of interest in the event Mr. Haberling does refer clients to the bank. Per the HABERLING FINANCIAL GROUP, INC. compliance manual and the firm's Code of Ethics he is required to disclose his relationship with the bank to clients. The second potential conflict of interest relates to the relationship of the firm to Pacific West Securities, Inc. (PWS). As stated earlier the purpose

of the relationship with PWS is to service legacy accounts that have not converted to fee based relationship. In many cases there is not a financial reason for the client to convert to a fee based relationship. In order for the firm to continue servicing the client the firm needs to maintain a relationship with a broker dealer. As stated earlier the firm is not seeking commission based accounts. However even though it is the firm's policy not to seek commissions, the advisors of the firm could have a motivation to recommend commission products. Per the HABERLING FINANCIAL GROUP, INC. compliance manual and Code of Ethics any firm advisor is required to disclose if there is a recommendation of a commissionable product. The recommendation must be approved by the firm's compliance officer Ty Haberling. The third potential conflict of interest is standard for most fee-based advisory firms. Because the firm's revenues are based upon assets there is a potential conflict of interest recommending clients not to pay-off debt or to keep excess capital in their investment account.

Brokerage Practices

Selecting Brokerage Firms

Haberling Financial Group recommends that our clients use the Bank of New York/Pershing LLC as a custodian for their brokerage account. The client is free to select any custodian. HABERLING FINANCIAL GROUP, INC. recommends custodians based on the proven integrity and financial responsibility of the firm, the best execution of orders at reasonable clearing fees and the accuracy in providing electronic downloads into our portfolio management system. The firm receives no portion of the clearing fees from custodians. The firm prefers Pershing LLC because it passes through 12b1 service fees that are paid by participating mutual fund companies to the firm. The firm factors the receipt of these service fees in pricing the client's advisory agreement. Most other custodians keep the 12b1 fees thus increasing the cost of asset management to the client. The firm attempts to be diligent in reducing all expenses incurred by the client. The firm also custodies assets at TIAA-CREF for IRA and Roth accounts and with Advisors Resources for those clients that require no load annuities.

Clearing & Execution Fees

Since HABERLING FINANCIAL GROUP, INC. uses primarily open end investment vehicles such as mutual and exchange traded funds and listed securities HABERLING FINANCIAL GROUP, INC. reviews trading fees from each custodian annually for competitiveness. HABERLING FINANCIAL GROUP, INC. does not receive any portion of the trading fees.

Soft Dollars

HABERLING FINANCIAL GROUP, INC. believes its soft dollar benefits from TD Ameritrade and Bank of New York/Pershing is non-material in value. The firm receives free stock research from TD Ameritrade and Bank of New York/Pershing. We may have an incentive to select a brokerage firm that provides free research and thus this could be viewed as a conflict of interest. HABERLING FINANCIAL GROUP, INC. estimates that it saves \$2,000 per year by not paying for research. This is an immaterial expense to our business operations.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit. In the event HABERLING FINANCIAL GROUP, INC. purchases a listed security for multiple clients it is generally completed through a group purchase so that all clients receive the same price.

Review of Accounts

Quarterly Reviews

Account reviews are performed quarterly by advisors Haberling, Messinger, Tallman, Lagonegro and Palm. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

Clients receive periodic communications at least annually and clients receive performance reports at the end of each calendar quarter. The quarterly reports include a performance report, holdings report and an allocation report. Reports generated for a client review generally include an Executive Summary Report that has commentary on every wealth management subject the firm is examining for the client. Other reports generated for a review may include a net worth statement, unrealized and realized gains reports, on track retirement analysis report, beneficiary update report, and a summary of objectives.

Client Referrals and Other Compensation

Incoming Referrals

HABERLING FINANCIAL GROUP, INC. has been fortunate to receive many client referrals over the years. The referrals came from current clients, attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does NOT compensate referring parties for referrals.

Referrals Out

When the firm refers clients to other professionals such as attorney, accountants, insurance agents, bank lending officers the firm does NOT accept referral fees or any form of compensation from other professionals when a prospect or client is referred to them.

Custody

Account Statements

All assets are held at qualified custodians, which means, the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by HABERLING FINANCIAL GROUP, INC.

Net Worth Statements

Clients are frequently provided net worth statements. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.

Investment Discretion

Discretionary Authority for Trading

HABERLING FINANCIAL GROUP, INC. accepts discretionary authority to manage securities accounts on behalf of clients. HABERLING FINANCIAL GROUP, INC. 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.

The client approves the custodian to be used and the clearing fees paid to the custodian. HABERLING FINANCIAL GROUP, INC. does not receive any portion of the transaction fees or clearing fees paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

HABERLING FINANCIAL GROUP, INC. does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, HABERLING FINANCIAL GROUP, INC. will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

HABERLING FINANCIAL GROUP, INC. does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because HABERLING FINANCIAL GROUP, INC. does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Business Continuity Plan

General

HABERLING FINANCIAL GROUP, INC. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters

such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, phone and data communications outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

The firm has buy-sell agreements funded with life insurance to provide for a smooth transition of ownership in the event of a death of an owner. The firm employs multiple advisors so a client would not be without advisory services. The firm employs a team approach to working with clients.

Information Security Program

Information Security

HABERLING FINANCIAL GROUP, INC. maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

HABERLING FINANCIAL GROUP, INC. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

HABERLING FINANCIAL GROUP, INC. requires that advisors in its employ have a bachelor's degree in either: finance, accounting or economics and demonstrate knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- Conform to the CFP Board of Standards Code of Ethics
- Complete ongoing continuing-education requirements

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.

- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

J. Tyler Haberling, CFP®**Personal and Educational Background:**

- Date of birth: 12/14/1959
- Graduate of Central Washington University 1983 with degrees in Accounting and Finance and minor in Economics.
- CFP (Certified Financial Planner) designation-completed in 1986
- CIMA (Certified Investment Management Analyst) designation in 1999 from Wharton Business School

Business Experience:

- Financial Planning Profession (1983 to present)
- Served as Chairman of Community First Bank from 1997-2008 and continues as a director and board member.

Disciplinary Information: None

Additional Compensation: Mr. Haberling earns less than \$5,000 per year as a director for Community First Bank.

Supervision:

J. Tyler Haberling is supervised by Stephen Palm, Operations Officer. Stephen Palm reviews Mr. Haberling's activities through our client relationship management system.

SUPERVISOR'S contact information:

509-735-7507 steve@hfginvest.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Benjamin D Messinger, CFP®**Personal and Educational Background:**

- Date of birth: November 30, 1970
- Graduate of Eastern Washington University, BA Finance, Economics minor
- Certified Financial Planner designation awarded June 2008

Business Experience:

- Financial Planning professional since February 1997

Disciplinary Information: NONE**Other Business Activities: NONE****Additional Compensation: NONE****Supervision:**

Benjamin D. Messinger is supervised by J. Tyler Haberling, Chief Compliance Officer. He reviews Benjamin's work through frequent office interactions. He also reviews Benjamin's activities through our client relationship management system.

J. Tyler Haberling's contact information:
(509)735-7507 ty@hfginvest.com

Arbitration Claims: None**Self-Regulatory Organization or Administrative Proceeding: None****Bankruptcy Petition: None**

T. Michael Tallman, CFP®**Personal and Educational Background:**

- Date of birth: 03/30/1972
- BS in Finance, University of Wyoming-1995

Business Experience:

- Financial Planning. (2004 – present)
- Bank Loan Officer (1998 – 2004)
- Bank Assistant Trust Administrator (1994 – 1997)

Disciplinary Information: none**Other Business Activities:**

- Mr. Tallman is a Registered Representative of Pacific West Securities and a minority (10%) owner of Haberling Financial Group, Inc.

- Mr. Tallman has registered with Haberling Financial Group and Pacific West Securities an outside business activity.

Additional Compensation:

- Mr. Tallman earns less than \$1,000 per year in outside business activities.

Supervision:

- T. Michael Tallman is supervised by, J. Tyler Haberling who reviews Mike Tallman's work through frequent office interactions. He also reviews Mike's activities through the client relationship management system.

SUPERVISOR'S contact information:
509-735-7507 ty@hfginvest.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Robert Lagonegro, CFP®

Educational Background:

- Date of birth: 09/07/1964
- Graduate of University of Washington, 1987 with degree in Business and a Finance concentration.
- CFP (Certified Financial Planner) designation-completed in 2010

Business Experience:

- Financial Planning Profession (2005 to present)
- Insurance and Banking (1990 to 2005)
- Sporting News (1989-1990)
- Banking (1987 to 1988)

Disciplinary Information: None

Other Business Activities: No

Additional Compensation: None

Supervision:

Bob Lagonegro is supervised by Ty Haberling. He reviews Mr. Lagonegro's work through frequent office interactions. He also reviews Mr. Lagonegro's activities through our client relationship management system.

SUPERVISOR'S contact information:
509-735-7507 ty@hfginvest.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Stephen Palm

Educational Background:

- Date of birth: April 6, 1974
- Graduate of The Master's College, 1997 with degree in Business Administration with emphasis in Finance.

Business Experience:

- Financial Planning Profession (2007 to present)
- Commercial Banking and Finance (1997 to 2007)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Stephen Palm is supervised by Ty Haberling. Ty reviews Mr. Palm's work through frequent office interactions and through our client relationship management system.

SUPERVISOR'S contact information:
509-735-7507 ty@hfginvest.com

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None