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Disclosure Brochure July 15, 2012

### **Item 1 – Cover Page**

This brochure provides information about the qualifications and business practices of The Hackett Group. If you have any questions about the contents of this brochure, please contact us at 504-521-6114 or [www.hackett-group.com](http://www.hackett-group.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

**The Hackett Group** is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser. Additional information about The Hackett Group also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The CRD # is 162981

### **Item 2 - Material Changes**

As this is the firm FIRM BROCHURE (Form ADV Part 2A) prepared by The Hackett Group, no material changes exist since there have been no previous versions.

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## Item 4 - Advisory Business

**The Hackett Group** is a Sole Proprietorship organized under the laws of the state of Louisiana; the owner is Toni Hackett Antrum, President, and CRD # 1112742

**The Hackett Group** operates as a consultant to boards of trustees and investment committees who manage pension funds, endowments, private foundations, corporations, Taft-Hartley and Trusts; operates as a consultant to defined contribution retirement plans;

### Philosophy

As a consultant, we provide independent and customized investment counsel and consulting services to defined contribution retirement plan sponsors. At The Hackett Group we translate and integrate the activities of the investment advisors and money managers, the custodial bank, the transition managers and the actuary into an accessible format so that the trustee or fiduciary can make the proper decisions regarding the fund – and make these decisions with confidence. The hallmark of this approach is training and education so that a fiduciary will make the best decisions possible on behalf of the plan participants.

The Hackett Group provides the following services:

- Evaluation of the client's current investment policy guidelines to determine if they are realistic;
- Preparation of a "Statement of Investment Policy and Objectives" that integrates the client's attitudes, objectives and requirements expressed in terms of return expectations and risk tolerance;
- Complete Asset Allocation and Liability Studies when requested to determine the proper mix of assets for the client.
- Search and presentation of the top investment advisors, money managers, and custodian banks whose philosophy and performance results meet the criteria set forth in the policy guidelines;
- Annual review of the "Statement of Investment Policy and Objectives" and asset allocation;
- Monitor the investment performance on a quarterly basis and providing a performance analysis report that examines the investment results versus the client's objectives, the market averages, and other investment advisor performance;
- Review monthly statements from the custodians of all funds in order to perform an analysis of portfolio attributes, comparative characteristics and style; and peer group/universal analysis and performance comparisons;
- Trustee education seminars; and
- Attendance at client offices and board meetings.

As a consultant, we do not provide any investment management services, nor exercise any investment discretion. We present all investment recommendations to the clients' board, trustees or directors. Implementation of any and all of our recommendations is at the sole discretion of the clients' board, trustees or directors.

The Hackett Group provides a suite of services to Defined Contribution Pension Plan Sponsor, including ;

- Assistance with plan design,
- Plan expense/cost analysis,
- Provider search assistance including
- RFP construction, vendor screening and selection,
- Participant communication,
- Participant education.

## Item 5 - Fees and Compensation

We are not affiliated with any investment manager, insurance company, brokerage firm, custodian, administrator or other 3rd party service provider. We do not engage in any soft-dollar fee arrangements or other revenue generating programs. We only offer our services on a fee-only basis. Our fee is charged monthly or quarterly, chosen by you at the time your agreement is executed, in arrears. We charge either a flat fee or an asset based fee.

The minimum annual fee for **The Hackett Group's consulting** services is \$15,000 per year.

All fees are negotiable at our sole discretion.

You may authorize us to have the custodian/broker-dealer pay us directly by charging your account. This authorization must be provided in writing. One-twelfth or one-fourth of the annual fee is charged in the month following the end of the previous month or each calendar quarter, as directed, in arrears. Your custodian/broker-dealer provides you with statements that show the amount paid directly to us. You should verify the calculation of our fees. If you do not authorize your custodian/broker-dealer to deduct the fee directly from your account, **The Hackett Group** will send you an invoice. The fee is calculated in the same manner and you are responsible for sending payment to **The Hackett Group**. Should you terminate the advisory agreement we have entered into within five (5) business days from the date the agreement is executed, you will receive a full refund of any fees paid. Should either one of us terminate the advisory agreement we have entered into before the end of a billing period, any unpaid fees for services received by you become immediately due and payable. The amount owed by you is calculated by dividing the advisory fee due for the month or quarter by the total number of days in the month or quarter. This daily fee is then multiplied by the number of calendar days in the quarter that our agreement was in effect. This amount, which equals the amount we earned for the partial month or quarter, is your fee.

## Item 6 - Performance-Based Fees & Side-by-Side Management

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments.

We do not charge performance-based fees on any of our client accounts.

## Item 7 - Types of Clients

We provide advisory services to pension and profit sharing plans, state or municipal government entities, endowments, private foundations, corporations, Taft-Hartley Plans and Trusts. We do not have minimum plan size requirements for investment consulting services.

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

As noted earlier in the Advisory section of the brochure, The Hackett Group is a pension consultant. As a consultant, we do not provide any investment management services, nor exercise any investment discretion. The company's core service is providing investment recommendations to the clients' board, trustees or directors. Implementation of any and all of our recommendations is at the sole discretion of the clients' board, trustees or directors.

We focus on the asset allocation decision of the fiduciaries we assist. The decision takes into account the liabilities of the fund, the cash flow needs of the retirement system and the risk profile of the trustees. Any investment manager recommendation is consistent with the purpose of the fund, taking into account the client's risk posture and the liabilities of the fund. The principal and staff of The Hackett Group are focused on conducting due diligence and research which enable us to understand and recommend current investment strategies consistent with the Investment policies of the fund.

## Item 9 - Disciplinary Information

The Hackett Group has not had any legal or disciplinary events in the past. The firm has not been the subject of any legal or disciplinary events that would be material to your evaluation of our business.

We are required to disclose disciplinary events that are material for our clients' evaluation of our advisory practices; therefore, pursuant to item 9C of the Form ADV Part 2A; Firm Brochure, question 9.C.2 asks that we disclose;

"A self-regulatory organization (SRO) proceeding in which your firm or a management person was found to have been involved in a violation of the SRO's rules and was: 1. Barred or suspended from membership or from association with other members, or was expelled from membership; or otherwise significantly limited from investment –related activities; or fined more than \$2,500"

In 1997, the introducing broker/dealer, WH Securities was suspended from membership by the National Association of Securities (NASD) for failure to file its' annual audited financial report. Toni Hackett Antrum was an owner and principal of the firm. The suspension resulted from the fraudulent behavior of the firms' Chief Financial Officer, CFO. It was subsequently determined that the CFO illegally converted in excess of \$50,000 from the Company. Upon this discovery and the dismissal of the employee, the Firm immediately filed the required financial audits and was reinstated to NASD. Ms. Antrum was fined for failure to properly supervise the employee.

On May 5, 1998, Toni Antrum, in connection with the above referenced violation, fulfilled her obligation to FINRA by paying the fine in full of \$10,000. Reference numbers are CO596005 and CO59600o32.

## Item 10 - Other Financial Industries Activities and Affiliations

We are a fee for service registered investment advisor. The owner of the firm, Toni Hackett Antrum is voluntarily terminated registration through FINRA. not currently licensed by FINRA and hold s a Series 7 and 63 licenses. She is currently no actively engaging in securities activities and was (U-5) on October 2010.

## Item 11 - Code of Ethics (“Code”), Participation or Interest in Client Transactions & Personal Trading

We have adopted a Code of Ethics (“Code”) to address the securities-related conduct of all personnel and representatives of The Hackett Group. The Code includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of our advisory representatives and employees be conducted in a manner consistent with the Code and avoid any actual or potential conflict of interest, or any abuse of an advisory representative’s or employee’s position of trust and responsibility;
- that advisory representatives may not take inappropriate advantage of their positions;
- that information concerning the identity of your security holdings and financial circumstances are
- confidential; and
- That independence in the investment decision-making process is paramount.

Furthermore we strive to deter any inappropriate behavior and encourage what is fair, right and just. We promote

- Honest and ethical conduct
- Full, fair and accurate disclosure
- Compliance with applicable rules and regulations
- Reporting of any violation of the Code
- Accountability to the client

We will provide a copy of the Code to you or any prospective client upon request.

### Insider Trading

The Company is in compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988. We do not share any non-public information with anyone who does not need to know and has set-up internal controls to guard non-public information.

## Item 12 - Brokerage Practices

We do not manage the assets of any pension or retirement plan or an asset based account and therefore we do not maintain a relationship for custody or trading with any licensed broker-dealer. The

focus of our practice is to evaluate performance of selected investment managers and the overall performance of the plan.

## **Item 13 - Review of Accounts**

### Performance Reports

ON a periodic basis (monthly or quarterly) we will provide clients with a performance evaluation of the investments or a performance report. The performance report reviews the performance of the pension/retirement plan using various modern portfolio statics that compare the performance of the investment managers to the guidelines called for by the Investment Policy Statement (IPS). The Performance Report provides historical and comparative information, and is not to be relied upon as a forecast or predictor of future performance returns.

### Investment Manager Reports

The Hackett Group will review fund data for all the investment managers on at least an annual basis, evaluating the managers' performance in achieving the desired objectives to the IPS. The review is directed to whether the investment manager's performance and discipline is consistent with the intent and objectives of the IPS. We will provide information to facilitate comparisons of the investment managers' overall performance benchmarks described in the plan's IPS

The client is responsible for reviewing and understanding the information and analysis provided and assessing the adequacy of any particular investment managers' overall performance. We will assist the client in fulfilling this responsibility.

## **Item 14 - Client Referrals and Other Compensation**

We do not receive any economic benefit from an independent party for our investment consulting services. In addition, we do not compensate persons/firms for client referrals.

## **Item 15 - Custody**

We do not take possession of or maintain custody of any funds, assets or securities, but will simply monitor the holdings within the retirement plan. Possession and custody of the funds, assets or securities shall be maintained by an independent custodian selected by the client.

## **Item 16 - Investment Discretion**

Most of our services under ERISA are provided as a 3(21) fiduciary. Under this arrangement we are a fiduciary to the plan, but do not have discretionary authority to make investment selections or replace investment option within the plan. We provide extensive investment toots to the trustees and/or administrators of the plan to guide them in their duty to implement, maintain, administer and provided fiduciary oversight of their investment programs.

There are no circumstances currently, nor do we expect there to be any circumstances in the future, where we will accepts discretionary authority over direct investment or client or participant assets.

**Item 17 - Voting Client Securities**

We are hereby expressly precluded from voting proxies. The client agrees that they will retain the right to vote all proxies or delegate that right to the investment managers hired to manage their assets.

**Item 18 - Financial Information**

We are not required to include financial information in our Disclosure Brochure since we will not take custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$1,200. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.

**END OF DISCLOSURE BROCHURE**