

Item 1 – Cover Page

Homan Wealth Advisors, LLC
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March 30, 2015

This Brochure provides information about the qualifications and business practices of Homan Wealth Advisors, LLC (“HWA”). If you have any questions about the contents of this Brochure, please contact us at (402) 763-6401. 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.

HWA 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 HWA also is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for HWA is 129433.

Item 2 – Material Changes

This Item of the Brochure will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. The most recent update of our brochure was March 30, 2015 and included the following material changes:

- The name of the firm has changed from HD Financial Services, LLC to Homan Wealth Advisors, LLC.
- Our new website address is www.homanwealthadvisors.com.
- Items 4, 5 and 13 have been amended to reflect that we no longer offer the Advisors Access™ 401k in coordination with BAM Advisor Services, LLC.
- Item 10 has been amended to reflect that Rick Braasch is no longer insurance licensed.

There were no historical changes made to our Brochure in 2014.

(Brochure Date: 3/30/2015)

(Date of Most Recent Annual Updating Amendment: 3/30/2015)

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Richard Homan, Managing Member, at (402) 763-6401.

Item 3 -Table of Contents

Item 1 – Cover Page.....	i
Item 2 – Material Changes	ii
Item 3 -Table of Contents.....	iii
Item 4 – Advisory Business	1
Item 5 – Fees and Compensation	3
Item 6 – Performance-Based Fees and Side-By-Side Management.....	6
Item 7 – Types of Clients	6
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9 – Disciplinary Information	8
Item 10 – Other Financial Industry Activities and Affiliations.....	8
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading	9
Item 12 – Brokerage Practices.....	10
Item 13 – Review of Accounts	12
Item 14 – <i>Client</i> Referrals and Other Compensation.....	13
Item 15 – Custody	14
Item 16 – Investment Discretion	14
Item 17 – Voting <i>Client</i> Securities.....	15
Item 18 – Financial Information.....	15

Item 4 – Advisory Business

HWA is owned by Richard Homan, both individually and through a legal entity, and has been providing advisory services since 2003.

As of December 31, 2014, HWA managed \$137,263,510 on a discretionary basis and \$0 on a nondiscretionary basis. In addition, we advised on \$54,822,198 in participant directed retirement plans.

Investment Management Services:

HWA manages investment portfolios for individuals, trusts, foundations, not-for-profits, businesses and pension or profit sharing plans. HWA will work with the client to determine the client's investment objectives and investor risk profile and will design a written investment policy statement.

HWA uses investment and portfolio allocation software to evaluate alternative portfolio designs. HWA evaluates the clients existing investments with respect to the clients investment policy statement. HWA works with new clients to develop a plan to transition from the clients existing portfolio to the portfolio recommended by HWA. HWA will then continuously monitor the client's portfolio holdings and the overall asset allocation strategy and hold regular review meetings with the client regarding the account as necessary.

HWA will typically create a portfolio of no-load mutual funds, and may use model portfolios if the models match the clients investment policy. HWA will allocate the clients assets among various investments taking into consideration the overall management style selected by the client. HWA primarily recommends portfolios consisting of mutual funds offered by Dimensional Fund Advisors (DFA). DFA sponsored mutual funds follow a passive asset class investment philosophy with low holdings turnover. Client portfolios may also include some individual equity securities in situations where disposition of these securities would present an overriding tax implication or the client specifically requests they be retained for a personal reason. These situations will be specifically identified in the client's Investment Policy Statement (IPS).

HWA manages mutual fund and equity portfolios on a discretionary or nondiscretionary basis. A client may impose any reasonable restrictions on HWA's discretionary authority, including restrictions on the types of securities in which HWA may invest client's assets and on specific securities, which the client may believe to be appropriate.

HWA may also recommend fixed income portfolios to advisory clients, which consist of managed accounts of individual bonds. HWA will request discretionary authority from advisory clients to manage fixed income portfolios, including the discretion to retain a third party fixed income manager. HWA will prepare a separate Fixed Income Investment Policy Statement for any client qualifying for separate fixed income portfolio services.

Pursuant to its discretionary authority, HWA will retain a fixed income securities manager. The fixed income securities manager will be provided with the discretionary authority to invest client assets in fixed income securities consistent with the clients Fixed Income Investment Policy Statement. The manager will also monitor the account for changes in credit ratings, security call provisions, and tax loss harvesting opportunities (to the extent that the manager is provided with cost basis information). The manager will obtain HWA'S consent prior to the sale of any client securities.

On an ongoing basis, HWA will answer client's inquiries regarding their accounts and review periodically with clients the performance of their accounts. HWA will periodically, and at least annually, review client's investment policy and risk profile to discuss the re-balancing of each client's accounts to the extent appropriate. HWA will provide to investment manager any updated client financial information or account restrictions necessary for investment manager to provide sub-advisory services.

In addition to managing the client's investment portfolio, HWA, in conjunction with it's affiliated accounting firm, may consult with clients on various financial areas including income and estate tax planning, business sale structures, college financial planning, retirement planning, insurance analysis, personal cash flow analysis, establishment and design of retirement plans and trust designs, among other things.

Employee Benefit Retirement Plan Services:

HWA also provides advisory services to employee retirement benefit plans. HWA will analyze the plan's current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. HWA will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

HWA will recommend changes in the plan's investment vehicles as may be appropriate from time to time. HWA generally will review the plan's investment vehicles and investment policy as necessary.

HWA will generally recommend a third party administrator for plan administration, which may provide online bundled services and an opportunity for plan sponsors to provide diversified portfolios to their participants along with daily account access, valuation, and investment education. HWA's affiliated accounting firm described below also offers non-advisory consulting services including plan design and document services, discrimination testing and other required plan administration services. These services are separate and distinct for HWA's advisory services.

For certain retirement plans, HWA also works in coordination and support with BAM Advisor Services, LLC ("BAM"). Retirement plan clients will engage both HWA and BAM. BAM will provide to the client additional discretionary investment management services and will exercise discretionary authority to select the plan investments made available to the plans' participants by selecting and maintain the plans' investments according to the goals and investment objectives of the plan.

HWA will continue to work with plans to monitor plan investments, provide fiduciary plan advice including regular considerations of the goals and objectives of the plan, and provide participant education services to the plan.

Item 5 – Fees and Compensation

In certain circumstances, all fees, account minimums and their applications to family circumstances may be negotiable.

HWA has contracted with BAM Advisor Services, LLC (BAM), for services including trade processing, collection of management fees, record maintenance, report preparation, marketing assistance, and research. HWA has also contracted with BAM for sub-advisory services with respect to clients' fixed income accounts. HWA pays a fee for BAM services based on management fees paid to HWA on accounts that use BAM Advisor Services. The fee paid by HWA to BAM consists of a portion of the fee paid by clients to HWA and varies based on the total client assets participating in BAM Advisor Services through HWA. These fees are not separately charged to advisory clients.

The specific manner in which fees are charged by HWA is established in a client's written agreement with HWA. Investment Management and Employee Benefit Plan clients will be invoiced in advance at the beginning of each calendar quarter based upon the value (market value based on independent third party sources or fair market value in the absence of market value; client account balances on which HWA calculates fees may vary from account custodial statements based on independent valuations and other accounting variances,

including mechanisms for including accrued interest in account statements) of the client's account at the end of the previous quarter. New accounts are charged a prorated fee for the remainder of the quarter in which the account is incepted (date of first trade).

For Investment Management and Employee Benefit Plan Services, HWA will request authority from the client to receive quarterly payments directly from the client's account held by an independent custodian. Clients may provide written limited authorization to HWA or its designated service provider, BAM, to withdraw fees from the account. Clients will receive custodial statements showing the advisory fees debited from their account(s). Certain third party administrators will calculate and debit HWA's fee and remit such fee to HWA.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.

HWA's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. These fees will generally include a management fee and other fund expenses. All fees paid to HWA for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders.

Such charges, fees and commissions are exclusive of and in addition to HWA's fee, and HWA shall not receive any portion of these commissions, fees, and costs.

Advisory Fees

Investment Management Services:

The annual fee for investment management services will be charged as a percentage of assets under management, according to the schedule below:

Assets under management	Annual Fee (%)
Up to \$249,999	1.25%
\$250,000 - \$499,999	1.00%

\$500,000 - \$999,999	0.90%
\$1,000,000 - \$1,999,999	0.80%
\$2,000,000 - \$2,999,999	0.70%
\$3,000,000 - \$3,999,999	0.60%
\$4,000,000 or greater	0.50%

All accounts for members of the client's family (husband, wife and dependent children) or related businesses may be assessed fees based on the total balance of all accounts.

Employee Benefit Retirement Plan Services:

The annual fee for plan services will be charged as a percentage of assets within the plan. Certain pre-existing employee benefit plan services clients may be on a different fee schedule.

Homan Wealth Advisors, LLC Fee Schedule

Assets under advisement	Annual Fee (%)
On the first \$1 million	.50%
On the next \$1 million	0.40%
On the next \$1 million	0.30%
On the next \$2 million	0.25%
On all amounts \$5 million or greater	0.18%

BAM Advisor Services Fee Schedule

Assets under advisement	Annual Fee (%)
On the First \$1,000,000	0.20%
On the Next \$4,000,000	0.15%
On the Next \$5,000,000	0.08%
On all amounts above \$10,000,000	0.05%

Example Calculation at \$1,500,000 of Assets:

HWA Fee = \$1,000,000 x .50% += \$5,000.00

\$500,000 x 0.40% = \$2,000.00

BAM Fee = (\$1,000,000 x 0.20%) + (\$500,000 x 0.15%) = \$2,750

Total Plan Fee = \$7,000.00 + \$2,750 = \$9,750.00

Item 6 – Performance-Based Fees and Side-By-Side Management

HWA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). All fees are calculated as described above and are not charged on the basis of income or capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

Item 7 – Types of Clients

HWA provides services to individuals, trusts, foundations, not-for-profits, businesses and pension or profit sharing plans.

A minimum of \$500,000 of assets under management is required for Investment Management Services. A minimum of \$300,000 is generally required for management services of portfolios of individual fixed income securities. These minimum account sizes may be negotiable under certain circumstances.

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

Methods of Analysis and Investment Strategy

HWA's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. HWA's investment approach is firmly rooted in the belief that markets are "efficient" over periods of time and that investors' long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. HWA recommends diversified portfolios, principally through the use of passively managed, asset class mutual funds. HWA selects or recommends to clients portfolios of securities, principally broadly-traded open end mutual funds or conservative fixed income securities to implement this investment strategy.

Although all investments involve risk, HWA's investment advice seeks to limit risk through broad diversification among asset classes and, as appropriate for particular clients the investment directly in conservative fixed income securities to represent the fixed income class. HWA's investment philosophy is designed for investors who desire a buy and hold strategy. Frequent trading of securities increases brokerage and other transaction costs that HWA's strategy seeks to minimize.

In the implementation of investment plans, HWA therefore primarily uses mutual funds and, as appropriate, portfolios of conservative fixed income securities. HWA may also utilize Exchange Traded Funds (ETFs) to represent a market sector.

Clients may hold or retain other types of assets as well, and HWA may offer advice regarding those various assets as part of its services. Advice regarding such assets will generally not involve asset management services but may help to more generally assist the client.

HWA's strategies do not utilize securities that we believe would be classified as having any unusual risks, and we do not recommend frequent trading, which can increase brokerage and other costs and taxes.

HWA receives supporting research from BAM Advisor Services and from other consultants, including economists affiliated with Dimensional Fund Advisors ("DFA"). HWA utilizes DFA mutual funds in client portfolios. DFA mutual funds follow a passive asset class investment philosophy with low holdings turnover. DFA provides historical market analysis, risk/return analysis, and continuing education to HWA.

Analysis of a Client's Financial Situation

In the development of investment plans for clients, including the recommendation of an appropriate asset allocation, HWA relies on an analysis of the client's financial objectives, current and estimated future resources, and tolerance for risk. To derive a recommended asset allocation, HWA may use a Monte Carlo simulation, a standard statistical approach for dealing with uncertainty. As with any other methods used to make projections into the future, there are several risks associated with this method, which may result in the client not being able to achieve their financial goals. They include:

- The risk that expected future cash flows will not match those used in the analysis
- The risk that future rates of return will fall short of the estimates used in the simulation
- The risk that inflation will exceed the estimates used in the simulation
- For taxable clients, the risk that tax rates will be higher than was assumed in the analysis

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs and individual bonds), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is

greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs utilized by HWA may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include large capitalization, medium capitalization and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in HWA's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities, or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds utilized by HWA may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses managing assets within each applicable sector.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of HWA or the integrity of HWA's management. HWA has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Affiliated Accounting Firm

Individuals of HWA are also Shareholders and/or Managers of the accounting firm, Hancock & Dana, P.C. (hereinafter "H&D"). H&D provides accounting services and non-advisory pension consulting services including plan design and document preparation, discrimination testing and other required plan administrative tasks.

H&D may recommend HWA to accounting and pension consulting clients in need of advisory services; and HWA may recommend H&D to advisory clients in need of accounting and plan administrative services. Services provided by H&D are provided for separate and typical compensation. There are no referral fee arrangements between HWA and H&D for these recommendations. No HWA client is obligated to use H&D for any services.

These individuals will allocate portions of their time according to the business demands of both the accounting firm business and HWA business. .

BAM Advisor Services, LLC

As described above in Item 4, HWA may exercise discretionary authority provided by a client to select an independent third party investment manager for the management of portfolios of individual fixed income securities. HWA selects BAM Advisors Services, LLC for such fixed income management. HWA also contracts with BAM Advisor Services, LLC for back office services and assistance with portfolio modeling. HWA has a fiduciary duty to select qualified and appropriate managers in the client's best interest, and believes that BAM Advisor Services, LLC effectively provides both the back office services that assist with its overall investment advisory practice and fixed income portfolio management services. The management of HWA continuously makes this assessment. While HWA has a contract with BAM Advisor Services, LLC governing a time period for back office services, HWA has no such fixed commitment to the selection of BAM Advisor Services, LLC for fixed income management services and may select another investment manager for clients upon reasonable notice to BAM Advisor Services, LLC.

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

HWA has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. HWA's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth HWA's practice of supervising the personal securities transactions of employees with access to client information. Individuals associated with HWA may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of HWA that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, HWA requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities

holding reports and quarterly transaction reports to the firm's principal. HWA also requires such access persons to receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements (limited offerings).

HWA's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information and protecting the confidentiality of client information. HWA requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

HWA will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

It is HWA's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. HWA will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an advisor, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated private fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment advisor in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an advisor is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

HWA arranges for the execution of securities transactions with the assistance of BAM Advisor Services. Through BAM, HWA participates in the Schwab Advisor Services (SAS) program offered to independent investment advisers by Charles Schwab & Company, Inc., member FINRA/SIPC, and the TD Ameritrade Institutional ("TDA") services program offered to independent investment advisers by TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. Charles Schwab & Company, Inc., and TD Ameritrade are unaffiliated SEC-registered broker dealers and FINRA member broker dealers.

The Schwab or TD Ameritrade brokerage program will generally be recommended to advisory clients for the execution of mutual fund and equity securities transactions. HWA

regularly reviews these programs to ensure that its recommendations are consistent with its fiduciary duty. This trading platform is essential to HWA's service arrangements and capabilities, and HWA may not accept clients who direct the use of other brokers. As part of these programs, HWA receives benefits that it would not receive if it did not offer investment advice (See the disclosure under Item 14 of this Brochure).

As HWA will not request the discretionary authority to determine the broker dealer to be used or the commission rates to be paid for mutual fund and equity securities transactions, clients must direct HWA as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that HWA will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. Not all investment advisers require clients to direct the use of specific brokers.

HWA will not exercise authority to arrange client transactions in fixed income securities. Clients will provide this authority to a fixed income manager retained by HWA on client's behalf by designating the portfolio manager with trading authority over client's brokerage account. Clients will be provided with the Disclosure Brochure (Form ADV Part II) of portfolio manager.

SAS and TDA do not generally charge clients a custody fee and are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through the broker or that settle into the clients' accounts at held at the brokers. Trading client accounts through other brokers may result in fees (including mark-ups and mark-downs) being charged by the custodial broker and an additional broker. While HWA will not arrange transactions through other brokers, the authority of the fixed income portfolio manager includes the ability to trade client fixed income assets through other brokers.

HWA does not have any arrangements to compensate any broker dealer for client referrals.

HWA does not maintain any client trade error gains. HWA makes client whole with respect to any trade error losses incurred by client caused by HWA. For clients utilizing TD Ameritrade for brokerage services, TD Ameritrade maintains a policy that any trade error gains will be donated by TD Ameritrade to charity.

HWA generally does not aggregate any client transactions in mutual fund or other securities. Client accounts are individually reviewed and managed, and transaction costs are not saved by aggregating orders in almost all circumstances in which HWA arranges transactions. BAM Advisor Services, LLC, in the management of fixed income portfolios, will aggregate certain

transactions among client accounts that it manages, in which case an HWA client's orders may be aggregated with an order for another client of BAM Advisor Services, LLC who is not an HWA client. See BAM Advisor Services, LLC Form ADV Part 2.

Employee Benefit Retirement Plan Services:

HWA does not arrange for the execution of securities transactions for plans as a part of this service. Transactions are executed directly through employee plan participation.

Item 13 – Review of Accounts

Reviews:

Investment Management Services:

Account assets are supervised continuously and formally reviewed quarterly by Richard Homan, Managing Member of HWA. The review process contains each of the following elements:

- a. assessing client goals and objectives;
- b. evaluating the employed strategy(ies);
- c. monitoring the portfolio(s); and
- d. addressing the need to rebalance.

Additional account reviews may be triggered by any of the following events:

- a. a specific client request;
- b. a change in client goals and objectives;
- c. an imbalance in a portfolio asset allocation; and
- d. market/economic conditions.

For fixed income portfolios, certain account review responsibilities are delegated to a third party investment manager as described above Item 4.

Employee Benefit Retirement Plan Services

Plan assets are reviewed on a quarterly basis or as otherwise agreed between the parties, and according to the standards and situations described above for investment management accounts.

Reports:

Investment Management Services

All clients receiving investment management services will receive quarterly performance reports, prepared by BAM and reviewed by HWA that summarize the clients account and asset allocation. Clients will also receive at least quarterly statements from their account custodian, which will outline the clients current positions, and current market value. Employee Benefit Retirement Plan clients generally receive statements only from their account custodian.

Employee Benefit Retirement Plan Services

Plan sponsors are provided with quarterly information and annual performance reviews from HWA. In addition, plan participant education information may also be provided to the Plan Sponsor or Administrator for distribution to the participants of the plan.

Item 14 – *Client Referrals and Other Compensation*

Other Compensation

As indicated under the disclosure for Item 12, SAS and TDA each respectively provide HWA with access to institutional trading and custody services, which are typically not available to retail investors. The 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.

SAS and TDA also make available to HWA other products and services that benefit HWA but may not benefit its clients' accounts. Some of these other products and services assist HWA in managing and administering clients' accounts. These include software and other technology 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 HWA's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of HWA accounts. The recommended brokers also makes available to HWA other services intended to help HWA manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory

compliance, and marketing. In addition, SAS may provide reimbursement and/or event subsidies for educational/informational seminars and conferences that HWA may host for clients. HWA does not, however, enter into any commitments with SAS or TDA for transaction levels in exchange for any services or products from brokers. While as a fiduciary, HWA endeavors to act in its clients' best interests, HWA's requirement that clients maintain their assets in accounts at SAS or TDA may be based in part on the benefit to HWA 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 SAS or TDA, which may create a potential conflict of interest.

HWA also receives software from DFA, which HWA utilizes in forming asset allocation strategies and producing performance reports. DFA also provides continuing education for HWA personnel. These services are designed to assist HWA plan and design its services for business growth.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. HWA urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

HWA usually receives, pursuant to an investment advisory contract, discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. For fixed income securities, this authority will include the discretion to retain a third party money manager for fixed income accounts. Any limitations on this discretionary authority shall be provided in writing. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

When selecting securities and determining amounts, HWA observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to HWA in writing.

Item 17 – Voting *Client* Securities

Proxy Disclosure: As a matter of firm policy and practice, HWA does not accept the authority to and does not vote proxies on behalf of advisory client. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive applicable proxies directly from the issuer of securities held in clients' investment portfolios. HWA, however, may provide advice to clients regarding the clients' voting of proxies.

Class Actions, Bankruptcies and Other Legal Proceedings: Clients should note that HWA will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held or previously were held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct HWA to transmit copies of class action notices to the client or a third party. Upon such direction, HWA will make commercially reasonable efforts to forward such notices in a timely manner

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about HWA's financial condition. HWA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.