

**Haven Wealth Group ADV**  
**February 26, 2019**

**Item 1 Cover Page**

- A. The name of our firm is Haven Wealth Group, LLC (HWG). It is located at 1111 North Loop West, Suite 1110, Houston, Texas 77008. The phone number for HWG is 713-980-8820. The fax number is 713-980-8053. The website for HWG is located at [www.havenwg.com](http://www.havenwg.com). The date of the writing of this brochure is February 26, 2019. Haven Wealth Group, LLC is a registered investment advisor.
- B. This brochure provides information about the qualifications and business practices of Haven Wealth Group, LLC. If you have any questions about the contents of this brochure, please contact us 713-980-8820 or email us at [haven@havenwg.com](mailto:haven@havenwg.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.
- C. Haven Wealth Group, LLC is a registered investment advisor. Registration does not imply a certain level of skill or training.

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**Item 2 Material Changes**

The following items were materially changed.

None

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**Item 4 Advisory Business**

- A. Haven Wealth Group has been in business for 10 years. The principal owners of the firm are Richea Powell and Charles Calvin.
- B. Haven Wealth Group manages money for individuals, pensions, foundations and endowment funds on a fully discretionary basis. HWG primarily invests in particular stocks and bonds as opposed to selection of funds. ETF's may be used to fill gaps between investments in individual stocks and bonds.
- C. HWG tailors their advisory services to allow for variations in risk tolerances, cash flow needs and asset mix. Clients can impose restrictions on investments in certain securities or types of securities.
- D. HWG does not participate in wrap fee programs.
- E. All HWG clients are managed on a fully discretionary basis. As of December 31, 2018, HWG had \$141,337,039 in assets under management which are all managed on a fully discretionary basis.

**Comprehensive Financial Planning**

HWG also provides comprehensive financial planning for individuals to help manage long-term goals and/or plan for retirement. This type of planning is necessary for any age client. Planning will help individuals to achieve any targets they set for any future needs. HWG considers planning to be an integral part of customer service.

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**Item 5 Fees and Compensation**

- A. Haven Wealth Group charges a fee for the discretionary management of the client's accounts based on the total value of their assets under management. The following represents HWG fee schedule based on the value of assets under management at the end of each calendar month:

<u>Portfolio Balance</u>	<u>Annual Rate</u>
1. Relationships Under \$500,000 Investments up to \$499,999	Fee 2.00%
2. Relationships Between \$500,000 and \$999,999 Investments up to \$999,999	Fee 1.80%
3. Relationships Greater than \$1,000,000 Investments up to \$2,000,000 The Next \$1,000,000 The Next \$2,000,000 Amounts exceeding \$5,000,000	Fee 1.50% 1.25% 0.80% 0.50%

Fees may be negotiable if there is a good business reason that offers justification.

- B. Fees are deducted monthly. Fees are always charged in arrears, and fees for a given month will be deducted during the first week of the following month. Example: Fees charged in February will be based on your account balance as of January 31<sup>st</sup>.
- C. In addition to the investment management fee, all stock trades incur a transaction fee of \$0.05 per share. Also, the custodian may charge a transaction fee. HWG currently custodies assets at Fidelity Investments.
- D. All client fees are collected each month in arrears. Clients are never billed or charged in advance.
- E. Neither HWG nor its supervised persons accept compensation for the sale of securities or other investment products, including asset-based products or service fees from the sale of mutual funds.

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

HWG does not charge any performance-based fees nor do any supervised persons at the company manage accounts that are charged performance based fees. HWG also does not participate in Side-by-Side Management.

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**Item 7 Types of Clients**

HWG manages investments for high net worth individuals, foundations, 401(k) plans, pensions, endowments, and some corporations. The minimum desired relationship size is \$1,000,000. However, the company will open accounts for individuals and entities with a lesser amount if there is a good prospect of obtaining additional funds in the near future. The relationship size is used by the company rather than account size, as many individual investors have investments split between taxable accounts and tax-deferred accounts of various sizes for different family members.

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

- A. Haven Wealth Group focuses on comprehensive financial planning and investment management. We use a values-based approach to craft investment plans with appropriate asset allocations tailored specifically to each client's individual financial needs and aspirations.

HWG utilizes an Absolute Return Investment Strategy. While all accounts are designed to meet individual cash flow needs and risk tolerances, we embrace the philosophy that portfolios should be designed to maximize returns during strong bull markets, while minimizing losses and protecting profits during bear markets. This does not mean that we can guarantee returns nor does it mean that we guarantee that a client avoids the risk of loss; it just implies that we evaluate each day's market conditions to determine how assets should be allocated between all asset classes given any market condition. By utilizing this strategy, the company can take prompt action to reallocate portfolios during periods of market weakness. All investments involve risk and therefore clients may incur losses.

- B. HWG considers each client's overall financial position, income requirements and return expectations when structuring portfolios. Fixed income and high dividend paying stocks are used to meet client cash flow requirements, while growth stocks are used to generate capital appreciation. Since growth stocks typically pay little to no dividends, the price volatility may be higher than income producing securities and may result in more volatility. If interest rates rise materially, fixed income securities may generate losses. Since 2007, short-term and long-term interest rates have been at historically low levels. The Federal Reserve recently began to raise interest rates. As these rates continue to increase, the prices of fixed rate bonds may fall and result in a loss of principal. HWG does not endorse "frequent trading" but rather allows market conditions and stock/bond specific information to determine when trading occurs.
- C. Haven Wealth Group utilizes research from multiple sources to analyze risks, growth, and future expected returns of various investments. The company looks at both the fundamental and technical aspects of each investment and each industry in which they operate. Risks include, but are not limited to, general market risk, company specific risk, and, with respect to bonds, interest rate risk. There are far too many factors that are beyond the control of any investment advisor's decisions to eliminate risk. Therefore, all investors must understand that there is always a risk of loss.



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**Item 9 Disciplinary Information**

Neither HWG nor its supervised persons are connected with any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

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**Item 10 Other Financial Industry Activities and Affiliations**

- A. No member of HWG management is registered or has an application pending to register as a broker-dealer or as a representative of a broker-dealer.
- B. No member of HWG management is registered or has an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the forgoing entities.
- C. HWG management does not have any relationships with any outside businesses that result in any client conflict of interests.
- D. HWG does not recommend nor select any other investment advisors for its clients.

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

A. Haven Wealth Group Code of Ethics:

Haven Wealth Group, LLC maintains a policy of strict compliance with the highest standards of ethical business conduct and the provisions of applicable federal securities laws, including rules and regulations promulgated by the Securities and Exchange Commission (SEC). This Code of Business Conduct and Ethics applies to each employee of the Company, including management. It is designed to ensure compliance with all legal requirements and the keeping of the Company's strictest standards of business conduct.

HWG employees have the responsibility to place the interests of Clients first at all times and never take advantage of Client transactions. They should avoid any conflicts, or the appearance of conflicts, with the interest of Clients. The Haven Wealth Group Policy on Personal Securities Transactions provides rules concerning personal transactions in Securities that employees must follow in carrying out these responsibilities. Employees also have a responsibility to act ethically, legally, and in the best interests of Haven Wealth Group, LLC and our Clients at all times. The Code of Conduct sets forth rules regarding these obligations. HWG employees are expected, not only to follow the specific rules, but also the spirit of the Code of Ethics.

While this Code does not address every possible situation that may arise, every Employee is responsible for exercising good judgment, applying ethical principles, and bringing potential violations of the Policy to the attention of the Chief Compliance Officer, Rosalie Groendes, of Haven Wealth Group, LLC. To this end, Employees shall read and understand this Code and uphold the standards in the Code in their day-to-day activities at the Company.

For a full copy of the Code of Ethics for Haven Wealth Group, please call us at 713-980-8820 or email us at [info@havenwg.com](mailto:info@havenwg.com).

B. Participation or Interest in Client Transactions:

Haven Wealth Group and all related persons do not, will not, and have not ever bought or sold any securities for client accounts in which they have any material interest. This type of transaction is strictly prohibited.

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C. Personal Trading:

Haven Wealth Group manages portfolios for the benefit of Haven Wealth Group employees in addition to those of its clients. Therefore, Haven Wealth Group advisory personnel invest in the same securities that it recommends to clients.

Various regulations require all broker/dealers and investment advisers to establish, maintain and enforce written policies reasonably designed to prevent the misuse of inside information by the Company and its Employees, particularly with regard to personal trading activity. To comply with these regulations, the Company has adopted certain securities trading policies. Employees should read the securities trading policy closely prior to taking part in any personal securities trading activities. These policies adhere strictly to sound business principles, industry practices and the highest ethical standards. Our policies are intended to ensure full conformity with the laws, rules and regulations of the governmental bodies and self-regulatory organizations that monitor our business activities.

D. Employee Trades and Trade Review:

To avoid any conflicts of interest where employee portfolios could receive favorable treatment, the following procedures are followed: Trades for employee portfolios are made at the same time as trades for client portfolios. These trades are typically "blocked" together so that all portfolios receive the same buy or sales price. In the event individual trades are made on a date when there are no block trades, these trades must be pre-approved by either the compliance officer or one of the partners of the firm. HWG maintains an employee trade book where employee and employee related trades that are not part of a blocked order are kept in date order for easy access.

Daily, the CCO receives the HWG Trade Blotter in a format listing all Buys and Sells arranged by individual tickers or CUSIPs. Daily review enables the CCO to clearly see what trades were done in large blocks encompassing specific HWG investment groups versus more individual trades (i.e., client requests to sell, specific needs to raise cash in a particular account or investing new funds received from clients).

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In this review, the CCO will question smaller trades to verify the reason for the trade and will also be able to further guard against any potential frontrunning by HWG traders. This compliance review will be noted and dated daily on the saved copy of the Daily Trade Blotter. The note will also show who performed the review on that date.

Monthly statements are also maintained and reviewed for all employee portfolios. The specific intent for this review process is to make sure that management is informed of personal trading and that no front-running occurs.

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**Item 12 Brokerage Practices**

A. Factors used in selecting or recommending broker-dealers for client transactions.

Haven Wealth Group has done extensive investigations in determining the brokers it uses in trading equities and bonds. Currently, Haven Wealth Group uses one broker to trade equities. That broker is Fidelity Investment. Fidelity Investments was chosen as a result of the pricing they offer, the timing of trade execution and most importantly, their customer service. The commission charges are shown below in Subsection 1: Research and Other Soft Dollar Benefits.

When trading bonds or Preferred Stocks, Haven Wealth Group maintains relationships with several bond Broker/Dealers to compare pricing when executing both buys and sells. Our policy is to request bids from at least two Broker/Dealers on bond transactions. Accounts with custody at Fidelity Investments with total account balances under \$105,000 are treated as an exception to this policy, as they are required to trade through a Fidelity bond broker.

If any client is interested in a list of bond Broker/Dealers used by Haven Wealth Group, they may contact the office at 713-980-8820 or mail us at Haven Wealth Group, 1111 North Loop West, Suite 1110, Houston, Texas 77008.

Best execution requires innovative technology that ensures speed, reliability and accuracy in market transactions. Haven Wealth Group has made a considerable investment in the development of an equity order-management system designed to allow us to conduct business efficiently. This system has a direct interface with the Fidelity equity trading desk. Our trading platform enables HWG to block trade accounts to ensure consistent execution prices across all managed accounts. All block trades are used to form average trade prices.

Best Execution not only means attaining the best price for a quoted bid or offer for an order, but it also means working a large order without moving the market in an adverse manner. Any thinly traded stocks are sold over time to avoid moving the market. Obtaining best execution for trades requires the best people. We understand the dynamics of both equity and bond trading, and we understand virtually every aspect of what happens to an order once it enters the market. We rely on our team to make smart decisions. Together we bring the skill, talent, and ability necessary to interact with the markets effectively. HWG conducts quarterly Best Execution reviews the 1<sup>st</sup> Monday of each quarter. In these meetings, new ideas and a review of old ideas are discussed to ensure that Haven Wealth Group is adhering to the Best Execution possible.

**Equities**

We control the explicit costs of trading by negotiating the best commission rates possible. Our blended commission rate for equity transactions is 5 basis points per share. HWG currently directs equity trades to Fidelity Investments. HWG established a soft dollar arrangement with Fidelity Investments. A

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portion of the commission flows through to the trading desk, and a portion pays for research defined by section 28(e) of the Exchange Act.

HWG believes that these commissions are reasonable in relation to the value of research and brokerage services received. We only accept services that we believe constitute true brokerage and research services. We do not accept products, consulting services, payment of exchange fees or other items that might be considered office overhead expenses from broker/dealers. The review of soft dollar expenses is an ongoing project. All soft dollar requests are reviewed for consideration before being presented.

### **Bonds and Preferred Stocks**

#### **Buys**

Haven Wealth Group (HWG) maintains relationships with several bond broker/dealers. To provide independent verification of Bond or Preferred Stock prices, we consider the following:

- Offerings from multiple dealers

- Offerings of similar bonds/stocks in terms of credit quality and maturity

- Spreads to the appropriate benchmark

- Prices available on Bloomberg

Most transactions are sent through BB&T, Morgan Stanley, Fidelity Investments, Raymond James, RBC or Mid Atlantic Capital Corporation.

#### **Sales**

When selling a bond position, we typically place the bond out for bid with at least two broker/dealers. Normally, these dealers are either BB&T, Morgan Stanley, RBC, Raymond James, or Fidelity Investments. In 2011, HWG established a relationship with Institutional Trading Services (ITS) which enhanced its best execution capability. ITS, now part of Mid Atlantic Capital Corporation, is a fully electronic trading system that allows buyers and sellers to obtain bids and offers from many different buyers and/or sellers, usually within minutes.

Small custodial accounts at Fidelity Investments are required to use the Fidelity bond trading desk to buy and sell bond positions. Fidelity defines small accounts as those accounts with balances under \$105,000. Although we are required to buy and sell bonds for these accounts with Fidelity, we still make sure that the bids/offers represent the best value for the client by considering other investment alternatives.

#### **B. Update to Prime Brokerage Fees**

In August, 2016, HWG renegotiated Prime Brokerage Fees charged to our clients by Fidelity Investments. Fidelity was charging each HWG client \$20 per transaction when we purchased or sold

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bonds through brokers other than Fidelity Investments. This transaction charge has now been reduced to \$5.

C. Other considerations

1. Research and Other Soft Dollar Benefits: Haven Wealth Group (HWG) controls the explicit costs of trading by negotiating the tightest commission rates possible. Our current commission rate for equities is 5 basis points per share. Equity trades are directed with Fidelity Investments. HWG has established a soft dollar arrangement with Fidelity Investments. Under this arrangement, a portion of commissions flow through to the trading desk as payment for brokerage and custodial services, and a portion pays for research defined by section 28(E) of the Exchange Act. This breakdown is split between 1 ½ cents paid to Fidelity Investments for trading fees and 3 ½ cents used for HWG soft dollar research.

HWG conducted extensive investigations in selecting the brokers currently used for trading equity and bond securities.

- a. HWG feels that the research services purchased with the proceeds from soft dollar commissions are an invaluable asset used in making investment management decisions on behalf of clients. This research is equally valuable to all Haven Wealth Group clients.
- b. Use of client commissions to pay for research and brokerage services creates a conflict of interest which must be disclosed to our clients. These conflicts include an incentive to disregard best execution obligations when directing orders and incentives to trade client securities inappropriately to earn credits for client commission services. HWG mitigates these conflicts by reviewing best execution policies and procedures including commission arrangements on a quarterly basis. During this review, HWG makes a good faith determination that the amount of client commissions paid are reasonable considering the value of products and services provided. HWG never negotiates any trades solely for the purpose of obtaining soft dollars.
- c. Although lower commission rates may be available from other brokers, HWG feels that the commission rate negotiated is competitive given the timing of trade



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execution and high level of customer service provided by Fidelity Investments. Further, HWG feels that the research services purchased with the proceeds from soft dollar commissions are an invaluable asset used in making investment management decisions on behalf of clients. Finally, HWG has consistently lowered the trading fees as the company has grown in assets under management.

- d. HWG's use of soft dollars for research and brokerage services benefits all client accounts equally. HWG allocates the cost of each product according to its use and makes every effort to exclude costs for non-eligible use of products and services provided by soft dollar vendors.
- e. During 2018, Haven Wealth Group negotiated with Vendor William O'Neil for better pricing on research products. HWG management was able to lower their annual payments to this vendor from \$140,724 per year to \$100,000 per year. This is significant to HWG's Best Execution Plan and to this ADV section because less expenses paid for current research frees up additional soft dollars to be spent on other research to benefit all HWG clients.
- f. The types of product services acquired with client soft dollar commissions include subscriptions to research publications which cover economic trends, data services such as real time pricing to keep managers informed of market developments, software suites utilized to conduct research on individual securities, software to obtain security specific and industry news, software which provides logarithmic charting of past and real time stock performance, software to assist in security valuation, and software suites which analyze client portfolios and generate reports. Examples of research providers include William O'Neil, Bloomberg, Thomson Reuters, Morning Star, and Ned Davis Research. Data providers include NYSE Group, Interactive Data, and Advent.

HWG obtains mixed use services from some research vendors. The availability of mixed use services from research vendors creates a conflict of interest as a determination must be made regarding whether a service or product constitutes research to be paid from soft dollar commissions or an overhead expense to be paid by HWG directly. Advent is a mixed-use research vendor. Advent is a software program that provides individual security analysis for client portfolios. This

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program is also used to calculate performance returns for client portfolios. The Axys Software also creates management reports that facilitate HWG's compliance with SEC regulations.

If any client is interested in a list of Soft Dollar Vendors used by Haven Wealth Group and the allocation of costs associated with their use, they may contact the office at 713-980-8820 or mail us at Haven Wealth Group, 1111 North Loop West, Suite 1110, Houston, Texas 77008.

- g. On a quarterly basis, HWG reviews soft dollar vendors and the use of the products and services offered by each vendor.

HWG makes a good faith effort to allocate the cost of each product according to its use and makes every effort to exclude costs for non-eligible use of products and services provided by soft dollar vendors. The payment of some products and services are split between soft dollars and HWG firm expenses based on the percentage use and benefit to all clients.

- 1. Brokerage for Client Referrals: Neither the HWG firm nor any of their related persons receive referrals from a broker-dealer or third party when selecting broker-dealers.

- 2. Directed Brokerage:

- h. HWG does not recommend, request, or require clients to direct us to execute transactions through a specified broker-dealer.
- i. HWG does not have any clients that direct us to execute transactions through a specified broker-dealer.

- D. Aggregation of the purchase or sale of securities for various client accounts:

HWG advisory personnel do invest in the same securities recommended to its clients. As a result, it is the policy of the company to avoid conflicts of interest where employees could receive favorable treatment. To avoid such conflicts, HWG trades employee portfolios at the same time it trades client portfolios. By honoring this policy, HWG employees will receive the same stock purchase prices as their clients and avoid front-running.

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It is understandable that individual employees may need cash or have excess cash to be invested from time to time. In these cases, if there is no client trade activity occurring on the same day, employee trades may be processed as individual orders after pre-approval has been obtained from an officer of the firm. No one will have the authority to approve their own trades. HWG maintains a book on all unblocked employee trades and trade dates.

The CCO reviews transaction activity reports generated by each custodian daily. In addition, employee investment account statements and employee transaction history are reviewed monthly. During this review, all employee trade activity is analyzed to ensure that block trade and pre-approval procedures were followed. No employee can review his or her own statements or transaction history, The HWG compliance officer or a firm principal reviews trade summaries for each employee. The specific intent of this review process is to ensure that management was informed of all trade activity and to ensure that no front-running has occurred.

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**Item 13 Review of Accounts**

- A. Haven Wealth Group has an Investment Review Program in place whereby it reaches out to all clients at least annually in an attempt to schedule a review. Every December, notices are emailed to every client, delivery receipt required, who has not had a review during the current year. Many clients respond to this mailing and schedule their annual review. Clients that do not respond will receive follow-up requests during the year by mail, email or phone call from our staff. An Excel spreadsheet is kept current to show the date of the last annual review for each client.

For many larger accounts, meetings are held more often: semi-annually or quarterly, depending on the client's needs and desires. These reviews are normally held by both partners of the firm. In the event one of the partners is not available, the other partner will conduct the review. Crissy Hebert conducts reviews on small portfolios and also presents individual planning results to clients of any size portfolios.

- B. In addition, client relationship meetings are held whenever a client requests a meeting or wants to discuss his or her portfolio.
- C. The content of Investment Reviews includes a summary of the portfolio's performance relative to the appropriate benchmark indices, performance attribution (i.e. sources of portfolio returns), economic and various other research reports that may be pertinent to the current investment climate and outlook. Our client reviews also contain a cash flow summary. Therefore, each investment review includes a summary of the client portfolio beginning balance, cash flow contributions and/or withdrawals, and actual net of fee investment dollar return for each year.

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**Item 14 Client Referrals and Other Compensation**

- A. Haven Wealth Group does not receive any economic benefits from non-clients for providing investment advice.
- B. Haven Wealth Group entered a Solicitor Agreement with Richard Wiesner on October 7, 2013. The named solicitor and Haven Wealth Group signed and agreed to the following:
  - 1. General: The investment adviser and the solicitor are registered under the Investment Adviser's Act of 1940 (The Act).
    - a. The solicitor is not a person (A) subject to a Commission order issued under section 203(f) of the Act, or (B) convicted within the previous ten years of any felony or misdemeanor involving conduct described in section 203(e)(2)(A) through (D) of the Act, or (C) who has been found by the Commission to have engaged, or has been convicted of engaging, in any of the conduct specified in paragraphs (1), (5) or (6) of section 203(e) of the Act, or (D) is subject to an order, judgment or decree described in section 203(e)(4) of the Act.
    - b. An agreed fee will be paid pursuant to this written agreement to which the adviser and the solicitor are parties.
    - c. The solicitor, at the time of any solicitation activities for which compensation is paid or to be paid by the investment adviser will provide the client or prospect with a current copy of the investment adviser's Written Disclosure Statement required by Rule 204-3 ("brochure rule") and a separate written disclosure document.
  - 2. Such cash fee will be paid to the solicitor with respect to solicitation activities for the provision of impersonal advisory services only.
    - a. Haven Wealth Group agrees to compensate the solicitor for any prospect or existing client solicitations that produce new investment opportunities resulting in new account balances or an increase in existing portfolio balances. Solicitor agrees to perform his duties under the agreement in a manner consistent with the instructions of the investment adviser and the provisions of the Act and the rules there under.
    - b. The investment adviser must receive from the client or prospect, prior to, or at the time of, entering into any written or oral investment advisory contract with such client, a signed and dated acknowledgment of receipt of the investment adviser's written disclosure statement (ADV Part II, sections A and B) and the solicitor's written disclosure document.

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- c. The investment adviser will make a bona fide effort to ascertain whether the solicitor has complied with this agreement, and has a reasonable basis for believing that the solicitor has so complied.
- 3. The solicitor shall be compensated as agreed and as stated within his Solicitor's Agreement.
- 4. The solicitor has been provided with copies of his or her own Solicitor Disclosure Form. A solicitor is required to give a copy of this Disclosure to all prospects that they solicit for Haven Wealth Group.
- 5. When prospects execute documents to become clients of HWG, they will be asked to sign a document stating that they have been given a copy of the aforementioned Solicitor Disclosure Form.

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**Item 15 Custody**

Haven Wealth Group has one qualified, third-party custody relationship with Fidelity Investments. This relationship allows for qualified, third party custody of client's assets, as well as providing qualified, third party reporting of asset valuation and generation of monthly statement reporting of all transactions, fees, and balances. All clients should carefully review the account statements they receive from the independent custodian. In addition, the custodian enables the client to monitor their investments daily, if they so choose, by utilizing the custody agent's on-line systems. Finally, the custody relationship removes direct access of client's money from the investment advisor. Therefore, the independent third party custodial relationship is a positive for the clients and offers no conflict of interest.

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**Item 16 Investment Discretion**

HWG provides investment management on a fully discretionary basis. If the client has any limitations that they wish to impose on HWG, they note those in the Investment Policy Statement that they sign when they open their relationship. These notes are placed either in the Restriction Section or the Special Circumstances Section depending on the limitation. If any existing client wishes to add any limitations on HWG after opening an account, they may do so by calling the firm at 713-980-8820 or sending this in the form of a written request by mail or email to the firm address in Item I.



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**Item 17 Voting Client Securities**

A. It is the policy of Haven Wealth Group (HWG) to give the client's their option of voting their own proxies for their investment accounts or offering to vote their proxies for them. It makes no difference to HWG which way the clients choose as there is no benefit one way or the other to our firm. If the clients choose for our firm to vote their proxies for them, HWG will make every effort to determine which way to vote considering the best interests of the client. HWG will consider each company's management recommendation, but will vote for or against those recommendations pending their opinion of which way offers the best value to the client's holdings.

B. The following procedures will be used for Proxy Voting:

When HWG receives and votes on proxies for the clients, the voting will be approved by one of the HWG partners (Richea Powell or Charlie Calvin) to ensure that the best decisions are made for the clients. A proxy form may be found on the HWG server. This form will be filled out by one of the partners and initialed, then given to the CCO to enter the votes.

The CCO will vote the shares as directed at: <https://central.proxyvote.com/pv/web.do>

After voting the shares, the Proxy Form should be scanned and filed electronically.

If requested, a copy of the proxy voting may be printed out to be picked up or mailed to the client. Clients requesting a copy of the voting can call Haven Wealth Group at 713-980-8820 or mail in a request at 1111 North Loop West, Suite 1110, Houston, Texas 77008.

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**Item 18 Financial Information**

- A. HWG does not require any prepayment of their fees on their services. As mentioned previously, all investment management fees are paid monthly in arrears. Therefore, no financial information is given to clients.
- B. Although HWG has discretionary authority of client portfolios, the firm does not require any clients to pay any fees in advance of services rendered.
- C. HWG has not been subject to a bankruptcy petition at any time during the past ten years.

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**Item 19 Requirements for State Registered Advisers**

Haven Wealth Group is registered with the Securities and Exchange Commission and notice files with the States of Texas and Georgia.