

Haven Wealth Group ADV
February 27, 2024

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. The date of the writing of this brochure is February 23, 2024. 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. 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.

Haven Wealth Group ADV
February 27, 2024

Item 2 Material Changes

The following items were materially changed.

None.

Haven Wealth Group ADV
February 27, 2024

Item 3 .Table of Contents

Item 1	Cover Page
Item 2	Material Changes
Item 3	Table of Contents
Item 4	Advisory Business and Planning
Item 5	Fees and Compensation
Item 6	Performance-Based Fees and Side-by-Side Management
Item 7	Types of Clients
Item 8	Methods of Analysis, Investment Strategies, and Risk of Loss
Item 9	Disciplinary Information
Item 10	Other Financial Industry Activities and Affiliations
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading
Item 12	Brokerage Practices
	A. The Custodian and Broker we Use
	How we Select Brokers/Custodians
	B. Your Brokerage and Custody Costs
	C. Update to Prime Brokerage Fees
	D. Other considerations
	1. Extensive Broker investigations of Brokers for Equity and Bond Trading
	2. Brokerage for Client Referrals
	3. Directed Brokerage
	E. Trade Aggregation
	F. Products and Services Available to us from Schwab
Item 13	Review of Accounts
Item 14	Client Referrals and Other Compensation
Item 15	Custody
Item 16	Investment Discretion
Item 17	Voting Client Securities
Item 18	Financial Information
Item 19	Requirements for State Registered Advisers

Haven Wealth Group ADV

February 27, 2024

Item 4 Advisory Business

- A. Haven Wealth Group has been in business for 15 years. The principal owners of the firm are Richea Powell, Charles Calvin, and Crystal Hebert.
- 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 mutual funds. Exchange Traded Funds (ETFs) may be used to gain exposure to certain market caps, styles, and types of investments.
- 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. Haven manages assets for clients on a fully discretionary basis and also acts as an advisor for 401(k) plans.

For fully discretionary asset management, assets under management are \$269,611,054 as of 12/31/2023.

For 401(k)'s, Haven serves in an advisory capacity, selecting mutual fund and exchange traded fund investment choices for the plans. Haven also advises 401(k) participants on their retirement savings program and offers asset allocation suggestions. Haven does offer fully discretionary investment management to 401(k) participants in the form of models based on risk tolerance. Ultimately, it is up to the 401(k) participants to select their investments. \$15,958,447 in assets under management are in 401(k) plans.

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 an option for clients of any age. Planning helps individuals achieve goals for any future needs. HWG considers planning to be an integral part of wealth management.

Fees paid by clients for Financial Planning are billed upon completion and presentation of the Financial Plan. Should a client fail to provide enough financial data for the advisor to complete the plan, Haven reserves the right to fee the client for time spent constructing the plan. Clients sign a Financial Planning Agreement before beginning a plan which discloses the fee for the plan and Haven's ability to bill for incomplete plans. Clients pay this fee directly to Haven Wealth Group in the form of a check.

Haven Wealth Group ADV
February 27, 2024

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 Haven's fee schedule is based on the value of assets under management at the end of each calendar month:

<u>Portfolio Balance</u>	<u>Annual Rate</u>
a. Relationships Under \$500,000 Investments up to \$499,999	Fee 2.00%
b. Relationships Between \$500,000 and \$999,999 Investments up to \$999,999	Fee 1.80%
c. 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 for good business reasons. Any negotiated fee must be approved by an executive officer of the firm. The rate approved in the negotiation will be stated in writing, signed by the client.

For clients who request to hold static balances in CD's or Money Market Funds, Haven assesses a reduced fee of 0.3% on those assets.

- B. In September 2020, Haven Wealth Group added a Research, Trading and Service Management Fee. The following represents this fee based on the value of assets under management at the end of each calendar month:

<u>Portfolio Balance</u>	<u>Annual Rate</u>
All balances	0.10%

Haven Wealth Group will charge this fee to cover a portion of the cost of research and other services that benefit both clients and Haven Wealth Group. This may represent a possible conflict of interest. The types of product services purchased with this fee include data services, such as, real time pricing to keep managers informed of market developments; software to assist in security valuation;

Haven Wealth Group ADV February 27, 2024

software suites that analyze client portfolios and generate reports. 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 by an additional fee or be an overhead expense to be paid by HWG directly. 401(k) clients of Haven do not pay this fee but may benefit from these services. This fee may be reduced in the future as Haven Wealth Group's Assets Under Management grow.

- C. Haven Wealth Group maintains a standalone procedure for its fee billing process as outlined below:

Investment Management Fees:

- Account values used to determine fees are based on a data download from the custodian, Charles Schwab, as of the last trading day of the month.
- Fees are applied on a monthly basis, in arrears. For example, the fee deducted in February is based on the portfolio market value on January 31st of the prior month. This portfolio market value is multiplied by the Annual Fee rate for the relationship. This figure is then divided by twelve to arrive at a monthly fee. The fee assessed does not depend on the number of days in the month.
- Haven Wealth Group reserves the right to charge fees on the first day assets transfer into the account at Schwab. However, we typically charge fees based on when the client assets are rebalanced and invested in securities.
- Haven Wealth Group combines related accounts for fee billing purposes to lower overall fees for families. We use our discretion to group parents, spouses, children, grandchildren, and great grandchildren together. Grouping related accounts is discussed with clients before an account transitions to Haven Wealth Group.
- At a client's request, Haven can crossbill certain client accounts where all fees are deducted from one account.
- Haven Wealth Group does not bill fees based on margin. We do not have any margin accounts under management.
- Haven does permit negotiated fee agreements that allow for the exclusion of assets from billing, such as cash balances or highly concentrated stock positions that will not be actively managed.

Financial Planning Fees

Clients sign a Financial Planning agreement before beginning a plan. The Financial Planning agreement discloses the cost of the Financial Plan to the client. Financial Plans require clients to provide substantial information about their finances. Should a Financial Plan be incomplete due to lack of response from a client, Haven reserves the right to bill the client for the time spent constructing the plan. Clients are notified of this in the Financial Planning agreement.

For completed plans, Haven bills clients following the completion and presentation of the Financial Plan. Clients pay this fee directly to Haven Wealth Group in the form of a check.

Haven Wealth Group ADV
February 27, 2024

- D. HWG currently custodies assets at Charles Schwab and Company. Schwab does not charge transaction fees on equities.
- E. Clients are never billed or charged in advance.
- F. 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.

Haven Wealth Group ADV
February 27, 2024

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

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

Haven Wealth Group ADV
February 27, 2024

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 that the assets under management will grow over time. 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.

Haven Wealth Group ADV
February 27, 2024

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.
- B. HWG considers each client's overall financial position, income requirements and return expectations when structuring portfolios. Fixed income, dividend paying stocks, and preferred stocks are used to meet client cash flow requirements, while growth stocks and options are used to generate capital appreciation. Growth stocks often pay little to no dividends. Options pay no dividends. Options positions are extremely volatile and risk the loss of principal. The price volatility of growth stocks may be higher than income producing securities and may result in more volatility. If interest rates rise materially, fixed income securities may generate losses and equity markets may experience considerable declines.
- C. Haven Wealth Group utilizes internal research as well as research from outside 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 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 of principals.
- D. Risks of Haven's investment strategy include the risk of a sudden market drop, including a simultaneous drop in both the equity and fixed income markets; the inherent difficulty of predicting future market movements and the risk that the firm will not accurately anticipate such market movements; that a tactical asset allocation strategy has tax implications, higher trading costs associated with more frequent trading. It is possible that Haven's strategy does not reduce downside volatility in all market conditions.

Haven Wealth Group ADV
February 27, 2024

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.

Haven Wealth Group ADV
February 27, 2024

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 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 utilizes Charles Schwab & Co., Inc. to custody client assets. This results in a conflict of interests. Complete details of this conflict can be found on Pages 19-20 of this document under the heading Services that Generally Benefit Only Us
- D. HWG does not recommend nor select any other investment advisors for its clients.

Haven Wealth Group ADV
February 27, 2024

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 haven@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.

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.

Haven Wealth Group ADV

February 27, 2024

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 "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).

In this review, the CCO will question smaller unblocked 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 available and maintained for all employee portfolios. Employees with investment accounts outside of Haven Wealth Group's authority are required to provide copies of their investment statements monthly to the CCO for her review.

Haven Wealth Group ADV

February 27, 2024

Item 12 Brokerage Practices

A. The Custodians and Brokers we Use:

Haven Wealth Group does not maintain custody of your assets that we manage. Although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account.

Your assets must be maintained in an account at a “qualified custodian”, generally a broker-dealer or bank. From our firm’s inception in 2008 to August 2020 we required that our clients use Fidelity Investments or Moody National Bank as their qualified custodian. From 2014 to 2016, we migrated client assets from Moody National Bank to Fidelity Investments. Beginning in August 2020 we required that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we require that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in item 14 (Client Referrals and Other Compensation). You should consider these conflicts of interest when selecting your custodian.

We will assist you with opening accounts at Schwab. If you do not wish to place your assets with Schwab, then we cannot manage your account. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, and we anticipate that most trades will be executed through Schwab, we can use other brokers to execute trades for your accounts as described below (see “Your Brokerage and Custody Costs”).

B. How We Select Brokers/Custodians:

Haven Wealth Group selects Schwab, a custodian/broker, to hold all client assets and execute most transactions. When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody).
- Capability to execute, clear, and settle trades (buy and sell securities for your account).
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, preferred stocks, options, exchange traded funds (ETFs), etc.
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices

Haven Wealth Group ADV

February 27, 2024

- Reputation, financial strength, security, and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below (see “Products and Services Available to us from Schwab”)

C. Your Brokerage and Custody Costs

1. Custody:

Our clients’ accounts will custody at Schwab. Schwab generally does not charge separately for custody services but is compensated by charging you commissions on bonds, options, and prime brokerage trades. Certain trades (for example, certain Mutual Funds, all ETFs, and all Equities) do not incur commissions or transaction fees at Schwab. Schwab is also compensated by earning interest on the un-invested cash in your account in Schwab’s Cash Features Program. Schwab’s fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$170 million of their assets in accounts at Schwab. This commitment benefits you because the overall fees you pay are lower than they would be otherwise.

In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a broker-dealer other than Schwab. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. In order to minimize your trading costs, we have Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How We Select Brokers/Custodians”). By using another broker or dealer you may pay lower transaction costs.

2. Brokerage:

Haven Wealth Group has completed extensive due diligence in determining the brokers it uses in trading securities (equities, bonds, preferred stocks, and options).

For equity trades, Haven Wealth Group uses the custodian of client assets as broker to trade equities. Schwab will act as the broker for equity trades. Factors considered in selecting a custodian/broker are detailed above (see “How We Select Brokers/Custodians”).

Haven Wealth Group ADV

February 27, 2024

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 total account balances under \$100,000 are treated as an exception to this policy, as they are required to trade through their custodian as broker pursuant to FINRA minimum equity requirements for Prime Brokerage trading.

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 Schwab trading desks. 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, ensuring that all clients receive the same execution pricing.

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, bond, preferred stock, and options 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 on the 1st 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.

a. Equities

Schwab: Client accounts custodied with Schwab will receive equity trades at \$0 commission rates.

b. 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

Haven Wealth Group ADV

February 27, 2024

- Offerings of similar bonds/stocks in terms of credit quality and maturity
- Spreads to the appropriate benchmark
- Prices available on Bloomberg, recently provided by Schwab
- Most transactions are sent through Schwab, DA Davidson Fixed Income Capital Markets, or Morgan Stanley-

Sales

- When selling a bond position, we typically place the bond out for bid to obtain multiple bids. We are often able to obtain enough bids from Schwab's Bond Platform. If this is not the case, we will put the bond out for bid with outside brokers including DA Davidson Fixed Income Capital Markets, or Morgan Stanley.

Small custodial accounts are required to use their custodian's bond trading desk to buy and sell bond positions pursuant to FINRA minimum balance requirements for Prime Brokerage. FINRA defines small accounts as those accounts with balances under \$100,000. Although we are required to buy and sell bonds for these accounts with the custodian, we still make sure that the bids/offers represent the best value for the client by reviewing bids from other sources.

D. Prime Brokerage Fees

Schwab assesses a fee of \$25 per transaction for Prime Broker / Trade Away transactions.

E. Other considerations

1. HWG conducted extensive investigations in selecting the brokers currently used for trading equity and bond securities.
2. 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.
3. Directed Brokerage:
 - a. HWG does not recommend, request, or require clients to direct us to execute transactions through a specified broker-dealer.
 - b. HWG does not have any clients that direct us to execute transactions through a specified broker-dealer.

F. Trade Aggregation

Haven Wealth Group ADV

February 27, 2024

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.

It is understandable that individual employees may need cash or have excess cash to be invested from time to time. 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. During this review, all employee trade activity is analyzed to ensure that block trade and pre-approval procedures were followed. The HWG compliance officer or a principle of the firm reviews and approves a trade sheet for each unblocked trade and that transaction is entered into a log. 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.

G. Products and Services Available to us from Schwab

Schwab does not have a Soft Dollar Arrangement with advisors whereby they provide Hard Dollar Credits to an account for the advisor or make payments to vendors on behalf of the advisor. They do, however, provide Soft Dollar benefits to their advisors by providing them with additional benefits and services outside the realm of custody and trading to help them manage and serve their customers. Some of these benefits might be educational webinars and seminars, newsletters, specific wealth management calculators, and staff support and training. These benefits are considered a conflict of interest. If they were not provided by Schwab, the advisor would have to produce or pay for these benefits. However, we believe the overall benefits to the client coming from the decision to use Schwab as our custodian outweigh the detriment from this conflict of interest.

Haven Wealth Group will charge a fee to cover the cost of research and other services that benefit all clients. The types of product services purchased with this fee include data services, such as, real time pricing to keep managers informed of market developments; software to assist in security valuation; software suites that analyze client portfolios and generate reports. 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 by an additional fee or be an overhead expense to be paid by HWG directly. 401(k) clients of Haven do not pay this fee but may benefit from these services.

Haven Wealth Group ADV

February 27, 2024

Schwab Advisor Services TM is Schwab's business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services.

Services that Benefit You: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that Do Not Directly Benefit You: Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our client's accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use the research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data (such as duplicate trade confirmations and account statements).
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts
- Provides pricing and other market data
- Facilitates payment of our fees from our clients' accounts
- Assists with back-office functions, recordkeeping, and client reporting.

Services that Generally Benefit Only Us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and compliance related needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Haven Wealth Group ADV
February 27, 2024

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of third party's fees. If you did not maintain your account with Schwab, we would be required to pay for those services from our own resources. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel.

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services.

These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to use Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Brokers/Custodians") and not Schwab's services that benefit only us.

Haven Wealth Group ADV

February 27, 2024

Item 13 Review of Accounts

- A. Annually, Haven Wealth Group clients are encouraged to schedule an Investment Review Meeting. At the meetings, discussion topics include, but are not limited to, a performance review of the portfolio as compared to the appropriate benchmark indices, client risk tolerance, and our market outlook. We also ask clients about new investment goals and objectives, and any anticipated future changes in cash flow requirements. We offer both in-house and virtual meetings to clients.

Financial Planning clients are also encouraged to schedule annual Financial Planning meetings. Such meetings require the client to provide information to update the financial plan.

- B. For many larger accounts, meetings are held more often: semi-annually or quarterly, depending on the client's needs and desires. Reviews are normally by a partner of the firm. Crystal Hebert conducts Financial Planning presentations.
- C. In addition, client relationship meetings are held whenever a client requests a meeting or wants to discuss his or her portfolio.
- D. 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, a portfolio appraisal and actual net of fee investment dollar return.

The content of Financial Planning presentations include a review of Total and Liquid net worth, projected future cash flows, probability of success and scenario analysis. Financial Planning presentations are customized to each client's situation, goals, and questions they are seeking answers for, advice on.

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Haven Wealth Group ADV
February 27, 2024

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. 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 prospective 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.
 - 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 complied.
 - 3. The solicitor shall be compensated as agreed and as stated within his Solicitor's Agreement.

Haven Wealth Group ADV
February 27, 2024

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 Solicitor Disclosure Form.
- C. We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices).

Haven Wealth Group ADV
February 27, 2024

Item 15 Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct the custodian to deduct our advisory fees directly from your account or if you grant us authority to move money to another person's account.

Haven Wealth Group has a qualified, third-party custody relationship with Charles Schwab. Schwab maintains actual custody of your assets. As of October 26th, 2020, Haven Wealth Group transitioned client assets from Fidelity Investments to Schwab and will maintain one custodian (Schwab) following the completion of this transition.

This relationship allows for qualified, third-party custody of client's assets, as well as reporting of asset valuation. Custodians generate monthly statements reporting 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 by utilizing the custody agent's on-line systems. The custody relationship removes direct access to client's money from the investment advisor. The independent third-party custodial relationship is a positive for the clients. While there are conflicts of interest in this arrangement (see "How We Select Brokers/Custodians"), the benefits to the client outweigh these conflicts.

Charles Schwab produces monthly statements for all Haven Wealth Group investment accounts. They are available on the Schwab website and Schwab app soon after the end of the month. Schwab sends an email notification of statement availability to the email address on file. You should carefully review these statements promptly when notified of their availability. If preferred, there is an option to have these statements mailed or emailed to you each month.

Haven Wealth Group ADV
February 27, 2024

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.

In connection with assets held in an IRA, Roth IRA, Archer Medical Savings Account, a Plan covered by Title I of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), or a plan described in Section 4975(e)(1)(A) of the Internal Revenue Code ("Code"), we provide the following disclosure to our clients:

We, as your Advisor, act as "fiduciaries" under ERISA or Section 4975 of the Internal Revenue Code (the "Code") (to the extent applicable) with respect to any investment advice we provide in connection with your Account and its holdings. When providing any such fiduciary advice to you, we will adhere to the standards of care described below (the "Impartial Conduct Standards"):

- A. When providing investment advice to you, we provide investment advice that is, at the time of the recommendation, in your "Best Interest." Advice meeting the "Best Interest" standard is advice that reflects the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on your investment objectives, risk tolerance, financial circumstances, and needs, without regard to the financial or other interests Haven Wealth Group.
- B. Transactions that we recommend will not cause Haven Wealth Group to receive, directly or indirectly, compensation for their services that is in excess of reasonable compensation within the meaning of ERISA Section 408(b)(2) or Section 4975(d)(2).

Haven Wealth Group ADV
February 27, 2024

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. HWG has no preference as there is no benefit 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 recommendations 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.

Haven Wealth Group ADV
February 27, 2024

Item 18 Financial Information

- A. HWG does not require any prepayment of fees on their services. All investment management fees are paid monthly in arrears. No financial information is given to clients. Financial Planning fees are charged and paid following completion and presentation of the Plan. HWG reserves the right to assess clients who do not provide enough information to complete the Plan for the time spent constructing the Plan
- 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 since inception of the firm in 2008.

Haven Wealth Group ADV
February 27, 2024

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.