



HURLEY | FINANCIAL GROUP, INC.

ADV Part 2A

PURSUANT TO RULE 204-3
OF THE INVESTOR
ADVISERS ACT OF 1940
September 30, 2024

Offered by:

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ADV, PART 2A

Item 1. Cover Page (See front cover of ADV Part 2)

Item 2. Material Changes

The following is a summary of the material changes Hurley Financial Group, Inc. ("HFG") has made to this brochure since the last annual update:

- Separated Form ADV Part A from Part B. Added Daniel James Thom as Investment Advisor Representative to Part B.

Item 3. Table of Contents

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Item 4. A-E Advisory Business

Hurley Financial Group, Inc.'s ("HFG") Investment Advisor Representatives ("IAR") primarily provides comprehensive wealth management services for individuals and high net worth households in or nearing retirement as part of an advisory fee program. Our principal owner is Dorann A. Hurley. We have been in business since 1997. Our advisory fee program includes investment consulting and management, advanced planning, and relationship management. Our advanced planning services address a range of financial needs for our clients beyond investment management including wealth protection, wealth transfer, tax planning, charitable gifting and education funding. Our relationship management services involve three key elements: first, fully understanding our clients' critical needs and meeting those needs over time through a consultative process; second, assembling and managing a network of financial experts; and third, working effectively with our clients' other professional advisors such as their attorneys and accountants.

The amount of client assets under our discretionary management as of December 31st, 2023 was \$302 M.

Item 5. Fees and Compensation

We offer our advisory fee program only through Schwab Advisor Services™ (SAS) platform. (Approximately 96% of Advisory Billing). Your assets will be maintained in an account at Charles Schwab & Co., Inc. (Schwab).

The SAS program is offered on a discretionary trading basis for continuous portfolio management.

In an account with discretionary trading, the IAR may purchase or sell load-waived mutual funds, no-load mutual funds and other equity and debt securities for accounts not included in the initial asset allocation, without obtaining specific client approval for each transaction.

In addition, SAS provides the following comprehensive investment consulting services:

- Review of investor's current financial situation and analysis of future financial goals
- Review of investor's current investments and design and implementation of appropriate investments based on the nature of client's other assets, family obligations and personal needs
- Year-long, continual monitoring of investments
- In-depth meetings: to review and evaluate investor's investment performance, update overall financial objectives, and reallocate investor's portfolio, as necessary
- Commission-free transactions on most stocks, bonds or mutual funds traded in investor's account
- Recommendations regarding positioning of funds within investor's employer provided retirement plans such as 401(k)s
- Quarterly letters detailing the firm's research, analysis and view of the current state of the investment markets
- Advice on other areas including, but not limited to, tax reduction, estate planning, retirement income and charitable giving strategies

Ongoing advisory fees for the SAS program are calculated using a banded fee schedule for assets under management. For clients with multiple portfolios in the SAS program, the fee schedule will be aggregated based on the total size of all portfolios per client household. Certain holdings may be excluded from billing, for example, individual stock holdings held as a courtesy for the client. Clients may be charged a maximum of 1.60% annually. However, the actual fee schedule is set forth in the Schwab Investment Advisory Agreement which is signed by the client prior to or concurrent with their engagement into the program.

HFG maximum fee schedule is listed in the table below.

Portfolio Value	Annual Fee Schedule
\$0 - \$1 M	1.60%
\$1 M - \$2 M	1.00%
\$2 M - \$5 M	0.80%
\$5 M and over	0.60%

The fee percentages listed above are annual fees. For example, a portfolio valued at \$500,000 at the end of a quarter would be billed at 0.40% or (\$2,000). The charges to the account are on an arrears basis and are remitted quarterly. The advisory fee is debited from the client's account by Schwab on behalf of HFG. Schwab does not participate in the Advisory fee. This fee is forwarded directly to HFG. HFG then forwards a fee to Geneos Wealth Management, Inc. ("GWM"), for the functions GWM is required to carry out by FINRA, Financial Industry Regulatory Authority.

The advisory fee is subject to negotiation and may be higher or lower than the cost of similar services offered through other financial firms. The advisory fees shall continue until thirty (30) days after IAR has notified client in writing of any change in the amount of the advisory fee. At such time, the new advisory fee will become effective unless client notifies IAR in writing that the account is to be closed.

Tamarac & Schwab Fees. As compensation for HFG's cost of trading and reporting services through the Tamarac system, HFG will charge a platform fee of 0.10% per annum (.0025%) per quarter in arrears for assets under management. Schwab generally will not charge you separately for custody services, commissions or transaction fees. Schwab will be compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. See Item 12. Brokerage Practices, for more details.

Upon written notification, the agreement may be terminated by either HFG or the investor. Prorated fees will be charged based on market value on the date the termination notice is received.

Clients sign an advisory fee contract with the IAR and account opening paperwork with Schwab. IAR provides to the client: HFG Form ADV, Form CRS and prospectuses are available on-line at the respective fund companies. Clients may request to receive all prospectuses in hard copy via regular mail. Clients also have the option to have the IAR receive all proxy materials and other security information.

HFG may provide investment advice through financial planning consultations (Less than 1% of total Advisory billing):

Hurley Financial Group, Inc. may receive fees for developing a detailed written financial plan or for providing consulting services for a client. Applicant will either be charged an hourly fee of between \$150.00/hour and \$250.00/hour or a flat fee of between \$250.00 and \$1,500.00. This specific fee will be communicated to the client and agreed to by the client prior to the commencement of work, through a signed Financial Planning Agreement. No financial planning fees are prepaid. Fees are due at the completion of the project or billed monthly for consulting services. The financial planning fee may be waived at IAR's discretion.

HFG may provide advice to client on matters not involving securities (Less than 1% of total Advisory billing):

Hurley Financial Group, Inc. may provide advice to its clients on matters not involving securities, such as tax reduction strategies, mortgage recommendations, estate planning strategies, and charitable giving strategies. The IAR may provide this advice for no addition fee above the investment supervisory service fees or the IAR may charge the client an hourly fee of between \$150.00/hour and \$250.00/hour. This specific fee will be communicated to the client and agreed to by the client prior to the commencement of work, through a signed Financial Planning Agreement. No consulting fees are prepaid. Fees are due at the completion of the project or billed monthly for consulting services.

HFG may provide asset allocation services for external Pension, Profit Sharing, 401k, 403b and other Retirement Plan Assets (Less than 1% of total Advisory billing):

As part of a financial planning analysis and engagement, the IAR will assist clients in determining their investment goals and objectives; risk tolerance and retirement plan time horizons. The IAR will then recommend an initial asset allocation. However, because such assets are custodied outside of the control of GWM and the IAR, the clients will be responsible for accepting and implementing the IAR's recommendations. Further, the IAR will neither provide continuous management and supervision or portfolio monitoring services for such accounts or receive ongoing, asset-based compensation. However, the IAR may offer its clients the service to conduct a review of such accounts on a periodic or annual basis for an hourly or fixed-fee.

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

Hurley Financial Group, Inc does not charge or pay performance based fees.

Item 7. Types of Clients

Hurley Financial Group, Inc. clients are primarily high net worth individuals and families at or nearing retirement. HFG has a defined household Investable Asset Minimum (IAM) of \$250,000. IAR may have lower minimums and the minimum household account size may be waived at the IAR's discretion. If a prospective client does not meet the IAM and wishes to become a client of Hurley Financial Group, Inc., IAR may charge a flat planning fee of \$500.00 per quarter in addition to any investment management service fees or product commissions, where applicable. This planning fee is reviewed at every annual client meeting and adjusted or moved as the client's assets approach and meet the IAM.

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

Hurley Financial Group, Inc. builds low-correlating global portfolios utilizing three main components; Core (US & International equities and bonds), Absolute Return Strategies (Tactical) and Non-Traded Assets (Real-Estate and Secured Notes). The Core portion provides opportunity for long-term capital appreciation by investing in large and small-sized companies into US, international and emerging markets. The Absolute Return portion of the portfolio contains several different active investment strategies designed for capital appreciation with a moderating effect on portfolio volatility. The Non-Traded assets in the portfolio provide diversification out of the stock market. This allocation may contain US real-estate investments in high quality commercial buildings, multi-family housing, raw land, and/or secured notes backed by various real-estate assets. This diversification provides the portfolio with an attractive current yield which maintains an opportunity for capital appreciation. The focus of our strategy is to provide long-term growth with lower market volatility.

Core – involves market risk based on asset allocation and can be more or less aggressive. Under our core philosophy, where appropriate, we utilize variable annuities with living benefits to protect from stock market losses. Where appropriate, death benefits may be used to protect assets from stock market losses for heirs. HFG continuously monitors the opinions of economists and analysts to determine the allocation of these assets.

Tactical – utilizes mathematical-based processes to adjust asset allocations between cash, bonds (both government and corporate), equities (including sector allocations such as biotech, natural resources, real estate and technology), gold and commodities. The objective of this strategy is to participate in growth opportunities in up markets and, more importantly, to be defensive during down markets.

Real Assets – utilizes non-traded real estate investment trusts (REITS) as well as private placement and limited partnership investments. These assets can be managed on a fee basis or the client can choose to waive asset management fees in lieu of commissions. HFG performs ongoing due diligence with investment providers and also utilizes the due diligence of GWM in assessing and monitoring these investment providers.

There is no guarantee that a low-correlating diversified portfolio will outperform a non-diversified portfolio in any given market environment. Investing involves risks including loss of principal. International and emerging markets may contain additional risks such as currency fluctuations and political and economic instabilities. Non-traded assets may experience periods of illiquidity.

Item 9. Disciplinary Information

Hurley Financial Group, Inc. has no disciplinary events, which include theft, fraud, bribery, perjury, forgery, counterfeiting, extortion or violations of security laws.

Item 10. Other Financial Industry Activities and Affiliations

None.

Item 11. Codes of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics:

HFG's Code of Ethics is based on the principle that all IARs and employees ("Access Persons") of HFG have a fiduciary duty to place the interest of our clients ahead of their own and the adviser's. Access persons must avoid activities, interests, and relationships that might interfere with making decisions in the best interests of the client.

A complete copy of Hurley Financial Group's Code of Ethics may be obtained upon request from the IAR or by writing to Hurley Financial Group, Inc., 111 SW 4th Street, Corvallis, OR 97333

Participation or interest in client transactions and personal trading:

HFG IAR's do not recommend securities or investment products in which Hurley Financial Group, Inc. has a financial interest.

Any recommendation of a security in which either IARs may have a financial interest is purely coincidental and IAR's would fully disclose any such interest to clients at once.

In the unlikely event that the interests of the IAR's account would happen to correspond with an advisory client's interests, full disclosure would be made to the client at once.

Related persons of HFG may buy or sell the same securities as those recommended to clients for their personal accounts. They may have an interest or position in certain securities, which may also be recommended to clients. IARs will not put their interests before a client's interest. It is Hurley Financial Groups, Inc.'s policy that IARs provide investment opportunities to clients before themselves. IARs and/or related persons may not trade ahead of their clients or trade in such a way to obtain a better price for themselves than for their clients, thus preventing them from benefiting from transactions placed on behalf of advisory accounts.

It is further noted that HFG is in and shall continue to be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, HFG has adopted a firm wide policy statement outlining insider trading compliance for its employees and associated persons. This statement has been distributed to all employees and associated persons of HFG and has been signed and dated by each such person. A copy of HFG's firm wide policy is maintained in a master file. Further, HFG has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm wide policy. These materials are also distributed to all employees and associated persons of HFG, and are signed, dated and filed with the insider trading compliance materials. There are provisions adopted for (1) restricting access to files, (2) providing continuing education, (3) restricting and/or monitoring trading on those securities of which HFG's employees may have non-public information, (4) requiring all of HFG's employees to conduct their trading through a specified broker or reporting all transactions promptly to HFG, and (5) monitoring the securities trading of HFG's employees and associated persons.

Item 12. Brokerage Practices

The custodian and brokers we use:

HFG does not maintain custody of your assets that we manage although if you give us authority to withdraw assets from your account we may be deemed to have custody of your assets. See Item 15 - Custody, below. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We require 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 do so. 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. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Schwab, then we cannot manage your account. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below. (See "Your brokerage and custody costs")

How we select brokers/custodians:

We seek to use a custodian/broker that will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider 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, 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.)
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Schwab")

Your brokerage and custody costs:

Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades for example, many mutual funds and ETFs may not encourage Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of 170M of HFG assets in accounts at Schwab. This commitment benefits you because the overall commission rates 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 different broker dealer but where the security spot or the funds from the securities sold or deposited settled into your Schwab account these fees are in addition to the commissions or other compensation you pay the executing broker dealer. Because of this in order to minimize your trading costs, we have Schwab execute most trades for your account. 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").

Products and services available to us from Schwab:

Schwab Advisor Services™ (SAS) 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. 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 a significantly higher minimum initial investment by our clients. Schwab services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you:

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our client's accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

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

Services that generally only benefit 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, compliance, legal and business 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

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

Our interest in Schwab's services:

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. Schwab has also agreed to pay up to \$68K we would otherwise incur for technology, research, marketing and compliance consulting products and services once the value of our clients' assets in accounts at Schwab reaches \$170M. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. This creates an incentive to require that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business and Schwab's payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interest 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 "Services that benefit you").

Item 13. Review of Accounts

For advisory services, securities are reviewed on an ongoing basis by the adviser, and if any changes are needed, they will be made when appropriate. Triggering factors include but are not limited to, the state of the markets, price momentum, relative strength, group relative strength, volume, accumulation, distributions, earnings and earning potential. For investments in mutual funds, the funds are compared to their respective indices to see if they are meeting expectations on a basis of risk versus reward. If funds are not meeting their objective, they are placed on a watch list for possible replacement. For advisory accounts with discretion, the IAR will implement changes in the portfolios as needed. For accounts managed on a non-discretionary basis, the IAR will contact the client to make recommendations.

The only reviewer is the advisor and is the sole decision maker for all financial accounts. Client's account performance is reviewed on an ongoing basis by the IAR. Systematic reports are generated monthly and more often as needed based on market conditions. Client meetings are scheduled annually or more often based on client's individual needs. Accounts that do not meet HFG's household minimum of \$500K may not receive annual performance reports and meetings are scheduled on an as needed basis.

Item 14. Client Referral and Other Compensation

We receive an economic benefit from Schwab in the form of support products and services it makes available to us and other independent investment whose clients maintain their accounts at Schwab. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain amount. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 - Brokerage Practices).

HFG may use product offerings including but not limited to Reg. D Private Placements and Structured Products in advisory accounts. If these products are priced with an upfront and/or trailing concession which can not be discounted to the client at the time of trade, HFG will use these concessions to offset brokerage costs on an aggregate client basis. It is possible for HFG to have more concessions than total costs on an annual basis.

Advisors of HFG sell insurance and investment products and will receive commission income on the sale of such products. In our registered representative capacity we could receive 12b-1 fees as a result of placing clients with mutual funds. Full disclosure will be made prior to such a sale. HFG may receive commissions for referring clients to other specialty insurance agents.

Hurley Financial Group, Inc. may receive financial support from product sponsors for advertising and/or client appreciation events which may appear to be a conflict of interest. Hurley Financial Group, Inc. does not base its decisions on choosing an investment product on whether or not a product sponsor chooses to participate in these costs. (An example of this financial support is a mutual fund company paying for a seminar advertisement or helping to pay for a portion of the cost of a client appreciation event.)

Item 15. Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct from your account or if you grant us authority to move your money to another person's account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We

also urged you to compare Schwab's account statements with the periodic portfolio reports you will receive from us.

Outside of the deemed custody as referenced in the above paragraph, Hurley Financial Group, Inc. does not have custody of client's funds held at bank, insurance or trust companies.

Item 16. Investment Discretion

For clients in the SAS program, IARs will be granted written discretionary authority via the client services agreement. IARs will have authority to determine the securities to be purchased or sold and the amount of securities that are purchased or sold.

Clients have the right to restrict this discretionary authority by notifying the IAR and/or Hurley Financial Group, Inc. in writing of any and all limitations.

Item 17. Voting Client Securities

HFG can accept authority to vote securities from clients in the SAS program. HFG votes proxies in the best economic interests of clients. HFG votes proxies in accordance with HFG's Proxy Voting Guidelines (the "Guidelines"). The Guidelines set forth the manner in which HFG will vote on matters that may come up for shareholder vote. HFG will review each matter on a case-by-case basis, and vote the proxies in accordance with the Guidelines. For example, the Guidelines provide that HFG will vote in favor of proposals to require shareholder ratification of any poison pill, shareholder proposals that request companies to adopt confidential voting, and for management proposals to do so, and shareholder social, workforce, and environmental proposals that create good corporate citizens while enhancing long-term shareholder value, and will vote against director nominees (or a Board) if it believes that a nominee (or the Board) has not served the economic long-term interests of shareholders.

HFG may obtain the client's consent to voting in the manner different from the stated Guidelines (or otherwise obtains instructions from the client as to how to vote on the proposal).

For each proxy, HFG maintains all related records as required by applicable law. A client may obtain a copy of HFG's Policy and Procedures, or a copy of the specific voting record for their account, by calling HFG at 1-541-757-2331, or writing to HFG at 111 SW 4th Street, Corvallis, OR 97333, or by emailing to dorannah@hurleyfinancial.com.

Item 18. Financial Information

HFG does not require pre-payment of advisory fees. All advisory fees are billed in arrears on a prorated basis, therefore a financial statement is not required.