

**Item 1: Cover Page**

**Halter Ferguson Financial, Inc.**

**13080 Grand Blvd., Suite 130**

**Carmel, Indiana 46032**

**317-875-0202**

**<http://www.hffinancial.com>**

**March 1, 2024**

**This brochure provides information about the qualifications and business practices of Halter Ferguson Financial, Inc. If you have any questions about the contents of this brochure, please contact us at 317-875-0202 or [info@hffinancial.com](mailto:info@hffinancial.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.**

**Halter Ferguson Financial, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.**

**Additional information about Halter Ferguson Financial, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Halter Ferguson Financial, Inc.'s CRD number is 109563.**

**Item 2: Summary of Material Changes**

There have been no material changes since the February 9, 2023, Form ADV filed on the IARD system.

### Item 3: Table of Contents

Item 1: Cover Page .....	1
Item 2: Summary of Material Changes.....	2
Item 3: Table of Contents.....	3
Item 4: Advisory Business .....	4
Item 5: Fees and Compensation.....	4
Item 6: Performance-Based Fees and Side-By-Side Management.....	6
Item 7: Types of Clients.....	6
Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss .....	6
Item 9: Disciplinary Information .....	7
Item 10: Other Financial Industry Activities and Affiliations.....	7
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	8
Item 12: Brokerage Practices .....	8
Item 13: Review of Accounts.....	11
Item 14: Client Referrals and Other Compensation .....	11
Item 15: Custody .....	11
Item 16: Investment Discretion.....	12
Item 17: Voting Client Securities .....	12
Item 18: Financial Information.....	12
Privacy Policy.....	12
Form ADV Part 2b for Each Supervised Person .....	14

**Item 4: Advisory Business**

Halter Ferguson Financial, Inc. ("Halter Ferguson Financial") was founded in Indianapolis, Indiana in 1986. The principal and sole shareholder is Bradford S. Ferguson, CFA.

Halter Ferguson Financial is a fee only financial planning and investment advisory firm that provides these services to individuals as well as businesses. These services are tailored to the individual needs of clients. Halter Ferguson Financial provides discretionary portfolio management services. The portfolio management clients give discretion to Halter Ferguson Financial to act in buying and selling securities, selection of the custodian, selection and retention of separate account managers, and transaction rates in managing the client's account. After developing an investment management policy with the client, Halter Ferguson Financial receives written authority by the client to buy and sell securities on behalf of the client within the stated parameters of that policy. Clients may impose in writing restrictions on investing in certain securities, types of securities or the sale of securities presently owned by the client.

For limited, specific clients, we manage concentrated investments with the selective use of options strategies. We have deemed these clients "REBELLIONAIRES" since they tend to have a more non-diversified approach of investing in a single asset, small number of assets, or a single asset class. As a result of this non-diversified approach, these clients typically have a higher risk tolerance and are in a position to incur significant short-term losses or illiquidity.

Financial planning services are described in the Halter Ferguson Financial, Inc. Financial Planning Engagement Agreement. This Agreement is provided to you before your first planning meeting and is also available on request. Halter Ferguson Financial is a fiduciary and is required to act in a client's best interest at all times.

Halter Ferguson Financial uses a third-party platform to facilitate management of held away assets, which are primarily 401(k) accounts, HSAs, and other assets. The platform allows Halter Ferguson Financial to avoid being considered to have custody of client funds since Halter Ferguson Financial does not have direct access to client log-in credentials. Halter Ferguson Financial is not affiliated with the platform in any way and receives no compensation from them for using their platform. A link will be provided to the client allowing them to connect an account(s) to the platform. Once client account(s) is connected to the platform, Halter Ferguson Financial regularly reviews the available investment options in these accounts, monitor them, and rebalance and implement Halter Ferguson Financial's strategies.

As of December 31, 2023, Halter Ferguson Financial had \$378,241,750 of assets under discretionary management.

**Item 5: Fees and Compensation**

Halter Ferguson Financial's fees are stated in the Investment Management Agreement. The fee for discretionary portfolio management services is based upon the following fee schedule:

<u>Household Assets</u>	<u>Quarterly Fee</u>	<u>Annualized Fee*</u>
First \$1,000,000	0.2500 %	1.00 %
Over \$1,000,000	0.1250 %	0.50 %

\*Minimum annual fee of \$2,000 and minimum account size of \$200,000.

This fee includes financial planning services, is assessed in arrears, accrued daily, and billed quarterly based on the market value of the Household Assets, including cash, on the last day of the previous quarter as valued by the Custodian. Although we have established the aforementioned fee schedule, we retain the discretion to negotiate alternative fees or waive the minimum fee/minimum account size

on a client-by-client basis. Client facts, circumstances, and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client. We may group certain related client accounts for the purposes of achieving the minimum account size requirements to determine the Household Assets.

For limited, specific clients, we manage concentrated investments with the selective use of options strategies. We charge a fixed fee of 1% annually for this discretionary management service. The fee is assessed in arrears, accrues daily, and is billed quarterly based on the market value of the account, including cash, on the last day of the previous quarter as valued by the Custodian. There is no minimum account size or minimum annual fee for this service.

Clients may pay Halter Ferguson Financial fees directly. Fees may also be directly deducted from the client's custodian account. Halter Ferguson Financial does not and will not have physical custody of client funds or securities.

In addition to the fee paid directly to Halter Ferguson Financial, the client will pay fees for custodial services, and for brokerage and other costs associated with client account transactions. Custodial fees vary by the size of the account and account type. Brokerage and other transactions costs also vary based on the level of account activity. Halter Ferguson Financial may recommend that clients establish brokerage accounts with Charles Schwab & Co., Inc. ("Schwab") or with Fidelity Institutional Wealth Services ("Fidelity") to maintain custody of clients' assets and to effect trades for their accounts. Schwab and Fidelity are independent and unaffiliated registered broker-dealers and members of FINRA and SIPC. For Halter Ferguson Financial client accounts maintained in their custody, Schwab and Fidelity generally do not charge separately for custody but are compensated by account holders through transaction-related fees for securities trades that are executed through Schwab or Fidelity or that settle into their accounts.

Clients may also incur other fees and costs. If client assets are invested in mutual funds, the client will pay indirectly to the mutual fund company management and other fees for those funds (the mutual fund fees are described in the funds' prospectuses). If a separate account manager is retained for a client's account, the client will also be responsible for paying directly to any separate account manager (and the custodian of that account) any separate account fees required for that account. Separate account fees vary by the size of the account and type of account, and will be disclosed to the client. The services may cost the client more or less than purchasing such services separately depending upon account fees, trading costs, and/or active management fees.

Clients will incur brokerage and other transaction costs. Please see Item 12 for more information about Halter Ferguson Financial's brokerage practices.

### **SELECTION AND MONITORING OF THIRD-PARTY MONEY MANAGERS**

We also offer advisory management services to our clients through our Selection and Monitoring of Third-Party Money Managers programs (hereinafter, "Programs").

We provide the client with an asset allocation strategy developed through personal discussions in which goals and objectives based on the client's particular circumstances are established. Based on the client's individual circumstances and needs we will then perform management searches of various unaffiliated registered investment advisers to identify which registered investment adviser's portfolio management style is appropriate for that client. Factors considered in making this determination include account size,

risk tolerance, the opinion of each client and the investment philosophy of the selected registered investment adviser. Clients should refer to the selected registered investment adviser's Firm Brochure or other disclosure document for a full description of the services offered. We are available to meet with clients on a regular basis, or as determined by the client, to review the account.

We monitor the performance of the selected registered investment adviser(s). If we determine that a particular selected registered investment adviser(s) is not providing sufficient management services to the client, we may suggest that the client contract with a different registered investment adviser and/or program sponsor. Under this scenario, we assist the client in selecting a new registered investment adviser and/or program. However, any move to a new registered investment adviser and/or program is solely at the discretion of the client.

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

We do not charge performance-based fees nor do we engage in side-by-side management.

#### **Item 7: Types of Clients**

Halter Ferguson Financial provides financial planning and investment advice to individuals, families, small businesses, trusts, charitable organizations and profit sharing plans. Portfolio management clients must initiate an account with a minimum deposit of \$200,000. There is no requirement to maintain a minimum account balance, but the minimum portfolio management fee is \$500 dollars per quarter. All fees and minimums are negotiable depending on size, number and type of accounts, and for family members.

Clients eligible to enroll in the Program include individuals, IRAs, and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the Program. The minimum investment required to open an account in the Program is \$5,000. The minimum account balance to enroll in the tax-loss harvesting feature is \$50,000.

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

Fundamental analysis is the primary method used to select investments. Halter Ferguson Financial follows the market on a regular basis and does a significant amount of reading and research to form an overall view of the market. Research resources include in-house research and various independent analysis reports and reporting services. Analysis also includes interpretation of indicators that are related to market sentiment (bullishness, bearishness, money flows). Halter Ferguson Financial uses these views to aid in determining an initial asset allocation. Market expectations are then merged with client objectives and risk tolerance to create a strategic asset allocation.

After developing an Investment Policy Statement with the client, the Advisor is given written authority (Investment Management Agreement) by the client to buy and sell securities on behalf of the client within the stated parameters of the Investment Policy Statement. The Investment Policy Statement can be changed to reflect changes in the client's objectives and risk tolerance. Typically, diversification of investments based on the client's objectives will be part of the recommendations. This type of investing utilizes themes to invest for the intermediate to long term. Halter Ferguson Financial invests client dollars and overweight's areas that it believes have favorable risk-return characteristics. Halter Ferguson Financial considers all of client's investments with the goal that the investments work together to either enhance return and/or reduce risk.

Investment recommendations may include mutual funds (including commodity, arbitrage and bond-backed derivative mutual funds), stocks, bonds, notes, bills, separate account managers, publicly traded REITs, options, annuities, certificates of deposit, cash or money market accounts.

As part of our investment strategy, we may recommend allocating portions of a client's assets to mutual funds, publicly traded REITs, or separate accounts managed by third party investment managers. Those other independent managers will have total investment discretion over the assets allocated to them. We annually conduct due diligence and monitor the performance on an ongoing basis of the investment vehicles and separate accounts managed by other managers. Nonetheless, they may conduct business with different custodians, banks, brokers, dealers and counterparties than those we utilize. Moreover, we have no direct ability to ensure that those other managers act in accordance with the stated investment policies or objectives of those funds or accounts, or otherwise act in conformity with applicable contractual, legal, regulatory or other standards and restrictions.

For limited, specific clients, we manage concentrated investments with the selective use of options strategies. These clients tend to have a more non-diversified approach of investing in a single asset, small number of assets, or a single asset class. Investing in a single asset or a small number of assets can be risky, as the performance of those assets can have a significant impact on the overall portfolio return. If a client's portfolio is heavily weighted towards one particular asset or asset class, then the client's returns may be highly dependent on the performance of that asset or asset class.

We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security which may lose value. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives a purchaser the right to buy an asset at a certain price within a specific period of time. We may buy a call if we believe the stock will increase in value before the option expires.
- A put gives a purchaser the right to sell an asset at a certain price within a specific period of time. We may buy a put if we believe that the price of the stock will fall before the option expires.

We may use options or funds with similar objectives to speculate on the possibility of a price swing. We may also use options to "hedge" a purchase of the underlying security; in other words, we may use an option purchase to limit the potential upside and downside of a security we have purchased for a client portfolio.

We more commonly use "covered calls", in which we sell an option on a security a client owns. In this strategy, the client receives a premium for making the option available, and the person purchasing the option has the right to buy the security at an agreed-upon price and date.

Investing in securities involves risk and clients bear the risk of loss on their investments. We ask that you work with us to help us understand your tolerance for risk.

#### **Item 9: Disciplinary Information**

Not applicable.

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

Matthew Smith, an employee of Halter Ferguson Financial, is a minority owner of Good Soil Investment Management, LLC. As an exempt reporting adviser, Good Soil Investment Management, LLC serves as general partner and advises on operations. Good Soil Investment Management, LLC and Halter Ferguson Financial are not affiliated entities. Advisory clients of Halter Ferguson Financial are not solicited for investments in any of the partnerships for which Good Soil Investment Management, LLC serves as general partner or for which Good Soil Investment Management, LLC provides investment advice. Furthermore, Halter Ferguson Financial does not provide investment advice to Good Soil Investment Management, LLC or any of the private funds for which Good Soil Investment Management, LLC serves

as general partner or provides investment advice.

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

The Halter Ferguson Financial Code of Ethics is based on the principle that Halter Ferguson Financial owes a fiduciary duty to its clients. As a fiduciary Halter Ferguson Financial will serve its clients' best interests and place those interests ahead of those of Halter Ferguson Financial. Halter Ferguson Financials Code of Ethics is available to any client or prospective client upon request.

Under the Code of Ethics, employees are permitted to invest in securities and other investment products for their own accounts, but may not use their knowledge of clients' portfolio transactions to benefit themselves.

We do not impose a set limit on the amount of trading employees may conduct for their own accounts, but we require employees to refrain from excessive trading.

Our Code of Ethics requires employees to disclose all personal investments upon hire and at least annually thereafter, report all personal securities transactions at least quarterly, disclose all personal investment accounts, and maintain their personal investment accounts with designated broker-dealer firms. Exceptions may be made for accounts for which the employee does not maintain investment control or participate in the investment decisions. Employees generally must arrange for their brokers to send us duplicate trade confirmations and account statements for their transactions, and must separately report on a quarterly basis any transaction for which a duplicate confirmation was not sent, or which does not appear on an account statement.

Employees' personal securities transactions generally must be approved in advance, subject to certain limited exceptions. Employees are prohibited from acquiring any securities in an initial public offering, while securities may be acquired in a secondary public offering with prior approval. Employees must obtain prior approval before acquiring any security in a private placement or investing in a private investment fund.

Our Code of Ethics requires employees to obtain prior approval to engage in certain outside business activities (such as serving as a director of a private, public or non-profit company). The Code of Ethics also prohibits employees from accepting gifts of material value from clients, vendors, service providers, and counterparties. Halter Ferguson Financial related persons do not buy or sell securities from clients.

Halter Ferguson Financial related persons can purchase or sell for their own account similar or different open-end funds as those purchased for, or recommended to, clients. Because these funds generally are broadly diversified and transact purchases and redemptions at net asset values determined after orders are received, Halter Ferguson Financial does not believe that a transaction by related persons presents any material conflict with client account.

#### **Item 12: Brokerage Practices**

##### The Custodian and Brokers We Use

Halter Ferguson Financial does not maintain physical custody of your assets that we manage, although are 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 the "qualified custodian," generally a broker-dealer or bank. We typically recommend that our clients use Charles Schwab & Co., Inc. ("Schwab") or Fidelity Institutional Wealth Services ("Fidelity") as the qualified custodian. Schwab and Fidelity are independent and unaffiliated registered broker-dealers and members of FINRA and SIPC. Schwab and Fidelity will hold your assets in a brokerage account and buy and sell securities when we or you instruct them to.



While we recommend that you use Schwab or Fidelity as custodian/broker, you will decide whether to do so and will open your account with Schwab or Fidelity 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. Even though your account is maintained at Schwab or Fidelity, 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 recommend a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services.

We consider a wide range of factors, including, among others:

- 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.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see *“Products and Services Available to Us From Schwab and Fidelity”*)

#### Your Brokerage and Custody Costs

For our clients' accounts that Schwab or Fidelity maintain, Schwab and Fidelity generally do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or that settle into their accounts. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. Schwab's commission rates and asset-based fees applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates or asset-based fees you pay are lower than they would be otherwise.

In addition to transaction-related fees or asset-based fees, Schwab or Fidelity charge 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 securities bought or the funds from the securities sold are deposited (settled) into your Schwab or Fidelity account. These fees are in addition to the transaction-related fees or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab or Fidelity execute most trades for your account. We have determined that having Schwab or Fidelity 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 and Fidelity

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. Together with Fidelity, they provide us and our clients with access to their institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab or

Fidelity retail customers. Schwab and Fidelity also make 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 and Fidelity's support services generally are available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab or Fidelity. If our clients collectively have less than \$10 million in assets at Schwab or Fidelity, they may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab's and Fidelity's support services:

#### Services That Benefit You

Schwab's and Fidelity's 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 and Fidelity include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's and Fidelity's services described in this paragraph generally benefit you and your account.

#### Services That May Not Directly Benefit You

Schwab and Fidelity also make 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 and Fidelity's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab or Fidelity. In addition to investment research, Schwab and Fidelity also make 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' accounts
- Assist with back-office functions, recordkeeping, and client reporting

#### Services That Generally Benefit Only Us

Schwab and Fidelity also offer 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

Schwab and Fidelity may provide some of these services themselves. In other cases, they will arrange for third-party vendors to provide the services to us. Schwab and Fidelity may also discount or waive their fees for some of these services or pay all or a 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 so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading transaction-related fees or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business 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 conflict of interest. We believe, however, that

our selection of Schwab as our primary 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 not Schwab's services that benefit only us. We have in excess of \$100 million in client assets under management, and we do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

If we make a trade error that results in a loss to a client, we will make the client whole. If we make a trade error that results in a gain to a client and the gain cannot be attributable to a particular client, Schwab, and not us, keeps the gain. In that case, if the gain is more than \$100, Schwab will donate the gain to charity. If the gain is less than \$100, Schwab will keep the gain to minimize and offset its administrative time and expense.

We also use other custodians as requested by the client, which could result in the client paying more in custodial fees and transaction charges. For example, a client that trades at a custodian other than Schwab or Fidelity may not be able to participate in an aggregated trade.

#### **Item 13: Review of Accounts**

Managed Accounts – All client accounts are reviewed at least quarterly, and a written report is issued to all clients about 10 days following the end of a quarter. Clients may elect in writing to receive their reports electronically. In addition to quarterly review, client accounts are reviewed and adjusted by the investment advisors as economic, market conditions and fund portfolio managers change. Client meetings and phone consultations to review the client's account activity are included in the service for investment management clients. At least an annual review meeting or phone conference is recommended but not required. Principal Bradford S. Ferguson, CFA is accountable for providing these services.

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

Halter Ferguson Financial does not directly or indirectly compensate any person for client referrals. Halter Ferguson Financial is a fee only firm and is not compensated by any person or firm who provides advisory services to our clients.

We receive an economic benefit from Schwab and Fidelity in the form of the support products and services they make available to us. These products and services, how they benefit us, and the related conflicts of interest are described above under *Item 12 Brokerage Practices*. The availability to us of Schwab's and Fidelity's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

#### **Item 15: Custody**

Halter Ferguson Financial does not have physical custody of client funds or securities. If there is any activity in a client account, clients receive monthly statements from the account custodian. If there is no activity in a client account, clients receive quarterly statements from the account custodian. Clients should carefully review those statements. Halter Ferguson Financial sends quarterly statements about 10 days following the end of a quarter. In addition to showing client holdings and value of the client account at the end of the quarter, the report contains the billing for the management fee. Clients should compare the account statements they receive from Halter Ferguson Financial with those they receive from the custodian. The account custodian does not calculate nor verify the accuracy of the advisory fee calculation. Clients may have standing letters of authorization on their accounts. The Firm has reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

**Item 16: Investment Discretion**

Clients who engage Halter Ferguson Financial for portfolio management services enter into an Investment Management Agreement with Halter Ferguson Financial. This agreement gives Halter Ferguson Financial discretion over their accounts. Discretion means Halter Ferguson Financial can buy and sell securities, and terminate separate accounts, without consulting with the client. Clients may impose in writing restrictions on investing in certain securities, types of securities or the sale of securities presently owned by the client. This should be done in writing at the time the client signs the Investment Policy Statement. The Investment Management Agreement can be cancelled by the client or by Halter Ferguson Financial by giving 30 days written notice.

**Item 17: Voting Client Securities**

As provided in Schwab's or Fidelity's account application the client does not appoint the Halter Ferguson Financial voting authority. Halter Ferguson Financial does not vote proxies for the client. The client is responsible for all issuer and issuer-related communications (proxies, tender offers, proposed mergers, rights offerings, exchange offers and warrants, among other things) that may require a voting decision or other action regarding investments held in your account. The custodian will send all issuer and issuer-related communications directly to the client. The client will be responsible for providing the custodian any applicable instructions or directions on those items. If requested by the client, Halter Ferguson Financial will provide advice on those actions that directly affect the client's holdings, but will not provide advice on proxy voting.

**Item 18: Financial Information**

Halter Ferguson does not require or solicit prepayment of more than \$1,200 in fees six months or more in advance. Halter Ferguson does not have any adverse financial information to disclose.

***Privacy Notice To Our Clients.***

We have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that the customer expects us to service their accounts in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about our customers. We want the customer to know what information we collect and how we use and safeguard that information.

**What Information We Collect**

We collect certain nonpublic personal identifying information about our customers (such as name, address, social security number, etc.) from information that the customer provides on applications or other forms as well as communications (electronic, telephone, written, or in person) with the customer or authorized representatives (such as attorneys, accountants, etc.). We also collect information about brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

**What Information We Disclose**

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship and then only to those persons necessary to effect the transactions and provide the services that the customer authorizes (such as broker-dealers, custodians, independent managers, etc.); (ii) persons assessing our compliance with industry standards (e.g. professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about our customers to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These

third parties are prohibited to use or share the information for any purpose. If the customer decides at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

#### ***Security of Customer Information***

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We restrict access to customer nonpublic personal information to those employees who need to know that information to service the accounts. We maintain physical, electronic, and procedural safeguards that comply with applicable federal or state standards to protect customer personal information.

#### ***Changes To Our Privacy Policy Or Relationship With The Customer***

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Our policy about obtaining and disclosing information may change from time to time. We will provide the customer notice of any material change to this policy before we implement the change.

If your personal information with us becomes inaccurate, or if you need to make a change to that information, please contact us at the number shown below so we can update our records.

**Item 1: Cover Page**

**Bradford S. Ferguson**

**Halter Ferguson Financial, Inc.**

**13080 Grand Blvd., Suite 130**

**Carmel, Indiana 46032**

**317-875-0202**

**<http://www.hffinancial.com>**

**CRD number: 5062898**

**March 1, 2024**

**This brochure supplement provides information about Bradford S. Ferguson that supplements the Halter Ferguson Financial brochure. You should have received a copy of that brochure. Please contact Bradford S. Ferguson, Chief Compliance Officer if you did not receive Halter Ferguson Financial's brochure or if you have questions about the contents of this supplement**

**Additional information about Bradford S. Ferguson is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2: Education and Background**

**Bradford S. Ferguson, CFA**

**Year of Birth: 1976**

### **EDUCATION**

Northwestern University, Evanston, IL, 1999, B.A. Statistics & Economics. CFA Institute, Charlottesville, NC, obtained Chartered Financial Analyst Charter 2006.

### **BUSINESS BACKGROUND**

Halter Ferguson Financial, April 2005 to Present.

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 90,000 CFA charterholders working in 135 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### **High Ethical Standards**

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### **Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

**Item 3: Disciplinary Information**

Not applicable.

**Item 4: Other Business Activities**

Not applicable.

**Item 5: Additional Compensation**

Not applicable.

**Item 6: Supervision**

Only the firm professionals Bradford S. Ferguson, CFA, Tiffany White, CFP®, and Matthew Smith provide advice to clients. Bradford S. Ferguson, CFA, President is responsible for all supervision. His phone number is 317-875-0202. As part of this role, Mr. Bradford Ferguson does quarterly spot checks of financial plans and investment reviews being presented to each client. Bradford Ferguson reviews all written client performance materials and newsletters prior to use. On a weekly basis, the investment team meets to discuss investment strategies and market conditions.



**Item 1: Cover Page**

**Tiffany White**

**Halter Ferguson Financial, Inc.**

**13080 Grand Blvd., Suite 130**

**Carmel, Indiana 46032**

**317-875-0202**

**<http://www.hffinancial.com>**

**CRD number: 6435426**

**March 1, 2024**

**This brochure supplement provides information about Tiffany White that supplements the Halter Ferguson Financial brochure. You should have received a copy of that brochure. Please contact Bradford S. Ferguson, Chief Compliance Officer if you did not receive Halter Ferguson Financial's brochure or if you have questions about the contents of this supplement**

**Additional information about Tiffany White is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2: Education and Background**

**Tiffany White, CFP®**

**Year of Birth: 1981**

### **EDUCATION**

DePauw University, Greencastle, IN 2003, B.A. Economics.

The American College of Financial Services, Bryn Mawr, PA 2010, CFP® Certification Curriculum.

CFP® Certification earned 2014.

### **BUSINESS BACKGROUND**

Halter Ferguson Financial, May 2007 to Present, Financial Planner

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

## **Item 3: Disciplinary Information**

Not applicable.

## **Item 4: Other Business Activities**

Not applicable.

## **Item 5: Additional Compensation**

None.

## **Item 6: Supervision**

Only the firm professionals Bradford S. Ferguson, CFA, Tiffany White, CFP®, and Matthew Smith provide advice to clients. Bradford S. Ferguson, CFA, President is responsible for all supervision. His phone number is 317-875-0202. As part of this role, Mr. Bradford Ferguson does quarterly spot checks of financial plans and investment reviews being presented to each client. Bradford Ferguson reviews all written client performance materials and newsletters prior to use. On a weekly basis, the investment team meets to discuss investment strategies and market conditions.

**Item 1: Cover Page**

**Matthew Smith**

**Halter Ferguson Financial, Inc.**

**13080 Grand Blvd., Suite 130**

**Carmel, Indiana 46032**

**317-875-0202**

**<http://www.hffinancial.com>**

**CRD number: 5922356**

**March 1, 2024**

**This brochure supplement provides information about Matthew Smith that supplements the Halter Ferguson Financial brochure. You should have received a copy of that brochure. Please contact Bradford S. Ferguson, Chief Compliance Officer if you did not receive Halter Ferguson Financial's brochure or if you have questions about the contents of this supplement.**

**Additional information about Matthew Smith is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2: Education and Background**

**Matthew Smith**

**Year of Birth: 1986**

### **EDUCATION**

Michigan State University, East Lansing, MI, B.A. East Asian Languages and Culture, 2009

University of Michigan, Ann Arbor, MI, Master of Business Education, Ross School of Business, 2018  
Series 65

### **BUSINESS BACKGROUND**

Halter Ferguson Financial, May 2023 to Present, VP of Equity Analysis

Good Soil Investment Management, LLC, May 2021 to April, 2023, Manager

CMS Energy Corporation, April 2013 to May 2021, Senior Financial Analyst, Principal Financial Analyst,  
and Asset Manager

## **Item 3: Disciplinary Information**

Not applicable.

## **Item 4: Other Business Activities**

Matthew Smith is a minority owner of Good Soil Investment Management, LLC. As an exempt reporting adviser, Good Soil Investment Management, LLC serves as general partner and advises on operations.

Good Soil Investment Management, LLC and Halter Ferguson Financial are not affiliated entities.

Advisory clients of Halter Ferguson Financial are not solicited for investments in any of the partnerships for which Good Soil Investment Management, LLC serves as general partner or for which Good Soil Investment Management, LLC provides investment advice. Furthermore, Halter Ferguson Financial does not provide investment advice to Good Soil Investment Management, LLC or any of the private funds for which Good Soil Investment Management, LLC serves as general partner or provides investment advice.

## **Item 5: Additional Compensation**

None.

## **Item 6: Supervision**

Only the firm professionals Bradford S. Ferguson, CFA, Tiffany White, CFP®, and Matthew Smith provide advice to clients. Bradford S. Ferguson, CFA, President is responsible for all supervision. His phone number is 317-875-0202. As part of this role, Mr. Bradford Ferguson does quarterly spot checks of financial plans and investment reviews being presented to each client. Bradford Ferguson reviews all written client performance materials and newsletters prior to use. On a weekly basis, the investment team meets to discuss investment strategies and market conditions.