

## **Firm Brochure**

(Part 2A of Form ADV)

### **HFH PLANNING INC.**

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This brochure provides information about the qualifications and business practices of HFH PLANNING INC. If you have any questions about the contents of this brochure, please contact us at: 212 402 5444, or by email at: [plan@hfhplanning.com](mailto:plan@hfhplanning.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.

Additional information about HFH PLANNING INC. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search the website by our CRD number, which is 114046.

March 1, 2024

## Material Changes

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### Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure, which was on March 16, 2023.

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### Material Changes since the Last Update

We have updated our Ongoing Planning and Advisory Services Fee Schedule. The minimum annual fee for new clients is \$4800 and the Schedule has been revised as follows:

Net Worth + Gross Income:	Annual Fee %
\$0 to \$1,000,000	0.60%
Next \$1,000,000	0.50%
Thereafter	0.30%

Our fees are negotiable and clients with a similar amount of assets to invest may incur different fees because of the use of net worth and gross income in the calculation. By using net worth and gross income to calculate fees, the intent of the Ongoing Planning and Advisory Service is to be truly objective, fair, transparent and aligned with the client's goals always.

Additionally, our recommended custodian is now Charles Schwab & Co., Inc. It purchased TD Ameritrade and the sale was finalized in 2023.

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### Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 212 402 5444 or by email at: [plan@hfhplanning.com](mailto:plan@hfhplanning.com).

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## Advisory Business

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### **Firm Description**

HFH PLANNING INC. (“we”, “us”, “our”) was founded in 1993.

We provide personalized confidential financial planning and investment management to individuals. Advice is provided through consultation with the client and may include determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

We are strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

Investment advice is provided, with the client making the final decision on investment selection. HFH PLANNING INC. does not act as a custodian of client assets. The client always maintains asset control. HFH PLANNING INC. places trades for clients under a limited power of attorney.

A written evaluation of each client’s initial situation is provided to the client, in the form of a comprehensive financial plan that addresses any of the areas described above. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone or in person and usually last between 20 minutes to one-half hour, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

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### **Principal Owners**

George Martin Poole CFP® is a 51% owner. Peter May CFP® is 49% owner.

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### **Types of Advisory Services**

HFH PLANNING INC. provides investment supervisory services, also known as asset management services, and furnishes investment advice through consultations.

On more than an occasional basis, HFH PLANNING INC. furnishes advice to clients on matters not involving securities, such as financial planning matters, tax planning, and trust services that often include estate planning.

As of December 31, 2021, HFH PLANNING INC. manages approximately \$169 million in discretionary assets. HFH PLANNING INC. also has \$77million in assets under advisement.

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**Tailored Relationships**

The goals and objectives for each client are documented for each client. A target asset allocation that reflects the stated goals and objectives is established for each client. Clients may have more than one target asset allocation based on the nature of their goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without the client's consent.

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**Types of Agreements**

The following agreements define the typical client relationships.

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**Financial Plan Development Agreement**

A financial plan is designed to help the client with all aspects of financial planning without any services provided once the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations that are based on the assessment of the client's risk tolerance and their goals and objectives; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

A target asset allocation is developed from an assessment of the client's risk tolerance and risk capacity. Specific recommendations relating to other aspects are provided as a part of the financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is \$1,080 and is negotiable and represents an initial payment for three hours of our services. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In most cases the discovery process and plan preparation are more extensive than the three hours mentioned above. Clients are advised of this probability at the initial interview. Each hour is charged, in 15-minute increments, at the \$360 rate.

After delivery of a financial plan, future meetings may be scheduled as necessary to refine the plan or make any additional recommendations requested by the client. Follow-on implementation work is billed monthly in

arrears at the rate of \$360 per hour or the client may establish an Ongoing Planning and Advisory Services Agreement detailed below.

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**Ongoing Planning and Advisory Services Agreement**

Just as important as having a completed Financial Plan is implementing, monitoring and maintaining all aspects of the Plan going forward. After completion of the financial plan, most clients then choose to have us assist with implementation of the plan, manage their assets and provide ongoing in-depth financial planning advice. Detailed investment advice and specific recommendations are provided to implement the target asset allocation developed in the financial plan. On an ongoing basis, if life events cause clients to change their goals and objectives, we will recommend and implement modifications to the plan.

The annual fee for this service, billed monthly or quarterly, is based on a client's combined net worth and will include any cash balances in the calculation and gross income, according to the following table:

Net Worth + Gross Income:	Annual Fee %
\$0 to \$1,000,000	0.60%
Next \$1,000,000	0.50%
Thereafter	0.30%

This covers investments, manager selection, monitoring all holdings, quarterly reporting and rebalancing and as detailed below in the Investment Advisory Services section; as well as ongoing insurance planning, tax planning, retirement planning, college planning and estate planning. The minimum annual fee is \$4,800, and fees are negotiable and clients with a similar amount of assets to invest may incur different fees because of the use of net worth and gross income in the calculation. By using net worth and gross income to calculate fees, the intent of the Ongoing Planning and Advisory Service is to be truly objective, fair, transparent and aligned with the client's goals always. As part of the ongoing review and modification of the plan, we generally meet with the client between two and four times per year.

The duration of this agreement is at the client's discretion. We will use the goals, objectives, and assessment of risk tolerance documented in the client's financial plan in providing recommendations related to the management of the client's investment portfolio. The client must inform us that there has been a change in their goals, objectives and/or risk tolerances. The client or HFH PLANNING INC. may terminate an Agreement at any time by written notice to the other party. At termination, fees will be billed on service provided prior to termination.

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**Investment Advisory Services**

The client can engage HFH PLANNING INC. to provide non-discretionary investment advisory services on a fee-only basis. HFH PLANNING INC.'s annual investment advisory fee is based upon a percentage (%) of the market value of the assets and will include any cash balances in the calculation placed under our management. Before engaging us to provide investment advisory services, clients are required to enter into an Investment Advisory Services Agreement with HFH PLANNING INC., setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the fee that is due from the client.

Market Value of Assets:	Annual Fee %
\$0 to \$500,000	1.00%
Next \$500,000	0.90%
Thereafter	0.65%

HFH PLANNING INC.'s annual investment advisory fee shall include investment advisory services. If the client requires extraordinary planning or consultation services (to be determined in the sole discretion of HFH PLANNING INC., we may determine to charge for such additional services pursuant to a stand-alone Financial Plan Development (see above).

We provide investment advisory services specific to the needs of each client. Before providing investment advisory services, we will ascertain each client's investment objectives. Then, we will allocate and/or recommend that the client allocate investment assets consistent with the designated investment objectives. We generally allocate or recommend that clients allocate investment assets among no-load mutual fund shares and exchange traded funds ("ETFs"). In addition, we may use model portfolios if the portfolio meets the investment objectives of the client. However, we may also accommodate clients and purchase other securities on a client's behalf upon an unsolicited request. Such purchases have historically been fixed-income securities, and individual equity securities. Once allocated, we provide ongoing monitoring and review of account performance, asset allocation and client investment objectives.

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**Tax Preparation Agreement**

Tax preparation work is performed separately and billed separately. Minimum fee for tax preparation is \$400. Eligible federal and applicable state returns are filed electronically without an additional fee.

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## Hourly Planning Engagements

We provide hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is \$360.

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## Asset Management

Assets are invested primarily in no-load or fee waived mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. We do not receive any compensation, in any form, from fund companies or brokerages.

Investments may also include: equities (stocks), exchange traded funds (ETFs), corporate debt securities, commercial paper, certificates of deposit, cash balances, municipal securities, investment company securities (variable annuities and mutual funds shares), U.S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through HFH PLANNING INC.

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## Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying HFH PLANNING INC. in writing and paying the rate for the time spent prior to notification of termination or the prorated annual fee for those clients whose fees are based on their net worth and gross income. If the client made an advance payment, we will refund any unearned portion of the advance payment.

HFH PLANNING INC. may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, we will refund any unearned portion of the advance payment.

## Fees and Compensation

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### Description

HFH PLANNING INC. bases its fees on hourly charges for Financial Plan Development, fixed fees based on a client's net worth and gross income for Ongoing Planning and Advisory Services, and fixed fees based on market value of assets for Investment Advisory Services.

Financial Plan Development:

Initial Fee: \$1,080 (3 hours) paid upon signing agreement.

Subsequently: \$360 per hour, billed monthly.

Subsequent Fees: \$360 per hour for implementation, billed monthly.



Ongoing Planning and Advisory Services:

Net Worth + Gross Income:	Annual Fee %
\$0 to \$500,000	0.60%
Next \$500,000	0.50%
Thereafter	0.25%

Subject to a minimum annual fee of \$2,400.

Investment Advisory Services:

Market Value of Assets:	Annual Fee %
\$0 to \$500,000	1.00%
Next \$500,000	0.90%
Thereafter	0.65%

Fees are negotiable. HFH PLANNING INC., in its sole discretion, may waive its minimum fee and/or charge a lesser fee. Because we feel that all people, regardless of net worth, deserve financial planning assistance we will reduce fees for clients whose assets and/or income is limited.

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**Fee Billing**

Fees for financial plans for the first 3 hours are paid upon signing the agreement, with the balance billed monthly, in arrears, meaning that we invoice you after the month billing period has ended for the hours spent working on the financial plan. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Annual fees for Ongoing Planning and Advisory Services are calculated at inception of the agreement, and then billed either monthly, quarterly or annually in advance as agreed to by the client and HFH Planning. The annual fee is recalculated every two years.

Fees for Investment Advisory Services are billed monthly, quarterly or annually in advance, based on the market value of the assets on the last business day of the previous month (if monthly), quarter (if quarterly) or year (if annually), as agreed to by the client and HFH Planning.

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**Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are

usually incidental to the purchase or sale of a security. The selection of the security or fund is more important than the nominal fee that the custodian charges to buy or sell the security.

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**Expense Ratios**

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% (50 basis points) for their services. These fees are in addition to the fees paid to HFH PLANNING INC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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**Past Due Accounts and Termination of Agreement**

HFH PLANNING INC. reserves the right to stop work on any account that is more than 30 days overdue. In addition, we reserve the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in our judgment, to providing proper financial advice. In the unusual situation where there are unused fees, those fees will be refunded within 15 days.

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**Retirement Rollover Conflicts of Interest Disclosure**

When we recommend you rollover a retirement account for us to manage, this creates a financial incentive because we charge a fee for our services. We attempt to mitigate the conflict of interest by acting in your best interest and applying an impartial conduct standard to all rollovers. Please note that you are not under any obligation to roll over a retirement account to an account managed by us.

## **Performance-Based Fees**

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

HFH PLANNING INC. does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry an inappropriately high degree of risk to the client.

## Types of Clients

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### Description

HFH PLANNING INC. generally provides investment advice to individuals. We work with individuals of all levels of wealth and may have clients with negative net worth.

Client relationships vary in scope and length of service.

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### Account Minimums

There is no minimum account size for assets under management.

Clients receive ongoing asset management services regardless of the size of their account or where the assets are held.

## Methods of Analysis, Investment Strategies and Risk of Loss

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### Methods of Analysis

Security analysis methods may include fundamental analysis and technical analysis.

Fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's *actual* business and its future prospects. The analysis is performed on historical and present data. On a broader scope, one can perform fundamental analysis on industries or the economy as a whole. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements. The risk associated with fundamental analysis is that despite that appearance that a security is undervalued, it may not rise in value as predicted.

Technical Analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. The risk associated with technical analysis is that there is no broad consensus among technical traders on the best method of identifying future price movements.

The main sources of information include financial newspapers and magazines, and research materials prepared by others.

Other sources of information that we may use include Morningstar Advisor mutual fund and stock information, mutual fund and exchange traded fund providers, Advisor Intelligence, and the internet websites focused on investments and financial planning.

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## Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation that includes **thirteen** asset classes. Clients may not own investments representing all thirteen asset classes in their portfolios since each client's portfolio is designed based on their goals, objectives, risk tolerance and preferences. HFH PLANNING INC. uses value oriented actively-managed funds where there are greater opportunities for managers to make a difference and passively-managed index and exchange-traded funds where we feel manager input is minor, and if specifically directed by the client. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives determined during the client interviews and consultations. The client may change these objectives at any time. Each client receives and approves a target asset allocation based on their objectives and their desired investment strategy.

Other strategies may include long-term purchases, margin transactions, pledged asset loans using clients' portfolios as collateral and tier one option strategies.

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## Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** International investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of

return (i.e. interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Selection Risk:** Selecting value oriented stocks and or funds over growth oriented funds may have a negative impact on portfolio performance. Neither approach is guaranteed to provide appreciation in stock market value; both carry investment risk. The return and principal value of investments fluctuate with changes in market conditions. Investments, when sold, may be worth more or less than their original cost. Investments seeking to achieve higher rates of return also involve a greater degree of risk.

## **Disciplinary Information**

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### **Legal and Disciplinary**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Other Financial Industry Activities and Affiliations**

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### **Financial Industry Activities**

HFH PLANNING INC. has no other financial industry activities.

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### **Affiliations**

HFH PLANNING INC. has no other financial industry affiliations.

# Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

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## Code of Ethics

The employees of HFH PLANNING INC. have committed to the CFP Board Code of Ethics and Standards of Conduct that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics and Standards of Conduct to any client or prospective client upon request.

Additionally, HFH PLANNING INC. has established its own Code of Ethics that establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. The firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

HFH PLANNING INC.'S Code of Ethics covers all supervised persons, and it describes the firm's high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes, among other things, provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All supervised persons must acknowledge the terms of the Code of Ethics annually or as amended.

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## Material Interest in Securities

HFH PLANNING INC does not have a material interest in any securities.

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## Participation or Interest in Client Transactions

HFH PLANNING INC. and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the HFH PLANNING INC. Compliance Manual.

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## Personal Trading

The Chief Compliance Officer of HFH PLANNING INC. is George Martin Poole who is also the Chief Executive Officer. He reviews all employee trades each quarter. His trades are reviewed by the Chief Operating Officer, Peter D. May.

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## Trade Error Policy

From time-to-time HFH Planning may make an error in submitting a trade order on your behalf. When this occurs, HFH Planning may place a correcting trade with the broker-dealer which has custody of your account. If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we

confer with you and you decide to forego the gain (e.g., due to tax reasons). If the gain does not remain in your account and Charles Schwab & Co. Inc. ("Schwab") is the custodian, Schwab will donate the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, HFH Planning will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in your account) if it is under \$100 to minimize and offset its administrative time and expense. Generally, if related trade errors result in both gains and losses in your account, they may be netted

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## **Retirement Plan Rollovers**

### **PLEASE NOTE: RETIREMENT ROLLOVERS-No Obligation/Conflict of**

**Interest**: A client leaving an employer typically has four options (and may engage in a combination of these options): i) leave the money in his/her former employer's plan, if permitted, ii) roll over the assets to his/her new employer's plan, if one is available and rollovers are permitted, iii) rollover to an IRA, or iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If HFH PLANNING INC. provides a recommendation as to whether a client should engage in a rollover transaction, HFH PLANNING INC. is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We may recommend an investor roll over plan assets to an Individual Retirement Account (IRA) managed by HFH PLANNING INC. A recommendation of i, ii or iii will generally result in no additional compensation to HFH PLANNING INC. if you have engaged us to monitor and/or manage the account while maintained at your employer as part of your Ongoing Planning and Advisory Service or Investment Advisory Service. There are various factors that we may consider before recommending a rollover, including but not limited to: i) the investment options available in the plan versus the investment options available in an IRA, ii) fees and expenses in the plan versus the fees and expenses in an IRA, iii) the services and responsiveness of the plan's investment professionals versus HFH PLANNING INC.'s, iv) protection of assets from creditors and legal judgments, v) required minimum distributions and age considerations, and vi) employer stock tax consequences, if any. No client is under any obligation to rollover plan assets to an IRA managed by HFH PLANNING INC.

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## **Client Obligations**

In performing its services, HFH PLANNING INC. shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify HFH PLANNING INC. if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

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**Disclosure Statement**

A copy of HFH PLANNING INC.'s written Brochure as set forth on Part 2A of Form ADV shall be provided to each client before or contemporaneously with the execution of the Financial Plan Development Agreement, Ongoing Planning and Advisory Services Agreement, and/or an Investment Advisory Agreement.

## Brokerage Practices

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**Selecting Brokerage Firms**

HFH PLANNING INC. does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. We recommend custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

HFH PLANNING INC. recommends discount brokerage firms and trust companies (qualified custodians), such as Schwab Advisor Services

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**Best Execution**

Most trades are mutual funds where best execution does not garner any client benefit since the purchases and sales are executed based on the mutual funds closing price. Exchange traded funds are executed using the trading facilities of Schwab Advisor Services who provides quarterly reports of their best execution statistics.

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**Soft Dollars**

HFH PLANNING INC. receives no soft dollar payments.

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**Order Aggregation**

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## Review of Accounts

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**Periodic Reviews**

Account reviews are performed quarterly by advisors George Martin Poole, CFP®, and Peter D. May CFP®.

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**Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.



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**Regular Reports**

Account reviewers are the Firm's financial planners. They are instructed to consider the client's current security/mutual fund positions and the likelihood that the performance of each position will contribute to the investment objectives of the client.

Clients receive periodic communications on at least an annual basis. Ongoing Planning and Advisory Services clients receive written quarterly updates. The written updates will include a listing of the client's accounts and the performance of the portfolio versus applicable benchmarks and a report of the client's asset allocation versus the client's target asset allocation and any recommended changes.

## **Client Referrals and Other Compensation**

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**Incoming Referrals**

HFH PLANNING INC. has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

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**Referrals Out**

HFH PLANNING INC. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

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**Other Compensation**

HFH PLANNING INC. does not receive any other form of compensation.

## **Custody**

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**Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

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**Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by HFH PLANNING INC.

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**Net Worth Statements**

Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning

where the exact values of assets are not material to the financial planning tasks.

## Investment Discretion

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### Discretionary Authority for Trading

HFH PLANNING INC. has no discretionary authority to manage securities accounts on behalf of clients. We advise clients of all purchases and sales we would like to make and provide 1 weeks' notice prior to any executions. The client has the opportunity to review our recommendations and not approve the trades. If the client does not respond within the 1 week period, the trades are made. The client approves the custodian to be used. HFH PLANNING INC. does not receive any portion of the transaction fees or commissions paid by the client to the custodian.

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### Limited Power of Attorney

A limited power of attorney is a trading authorization for the purpose of permitting HFH PLANNING INC. to place trades. Clients sign a limited power of attorney to facilitate the process.

## Voting Client Securities

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### Proxy Votes

HFH PLANNING INC. does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, HFH PLANNING INC. will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

## Financial Information

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### Financial Condition

HFH PLANNING INC. does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because HFH PLANNING INC. does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, or six months or more in advance.

# Business Continuity Plan

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## General

HFH PLANNING INC. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of communications, services or key people.

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## Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived in multiple geographic locations.

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## Alternate Offices

HFH Planning provides all of its services virtually and each employee has multiple methods available to access all information needed to continue to provide HFH Planning's services.

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## Loss of Key Personnel

George Martin Poole, CFP® and Peter May CFP® are positioned to support each other in the event of the death or disability of either.

# Information Security Program

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## Information Security

HFH PLANNING INC. maintains a security program to reduce the risk that your personal and confidential information may be breached.

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## Privacy Notice

HFH PLANNING INC. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, insurance agents and providers, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a

limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf and third parties that assist HFH in providing you with services.

We maintain a secure environment so that your information is not placed at an unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

## Brochure Supplement (Part 2B of Form ADV)

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### Education and Business Standards

HFH PLANNING INC. requires that advisors in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: Certified Financial Planner, Registered Financial Consultant, Certified Public Accountant, Attorney or having a master's in business administration. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

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### Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner™ (CFP®): Certified Financial Planners™ are licensed by the CFP Board to use the CFP® mark. CFP® certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the CFP® Certification Exam.
- Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Successfully pass the Candidate Fitness Standards and background check and agree to adhere to the ethics and practice standards outlined in the CFP Board's Code of Ethics and Standards of Professional Conduct.

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**George Martin Poole, CFP® RFC®****Educational Background:**

- Date of birth: September 24, 1955
- University of North Carolina at Chapel Hill – BS Business Administration, 1977
- New York University Stern School of Business – MBA Finance, 1979
- New York University School of Continuing Education – Certificate in Financial Planning, 2006

**Business Experience:**

- HFH Planning - Financial Strategist 51% Owner, 2009 – Present
- Citi Smith Barney - Wealth Management Product Specialist, 2007 – 2008
- US Trust Company of New York – Wealth Manager, 1999 – 2005

**Disciplinary Information: None****Other Business Activities:**

National Associate of Personal Financial Advisors (NAPFA) 2010 to Present

Past President – 333 Tenants Corporation  
Former Trustee and Chairman of Investment Committee – Trinity Baptist Church, NY NY

**Additional Compensation: None****Supervision:**

Peter D. May CFP® reviews George Martin Poole's work through our internal network of client data as well as remote interactions.

**Supervisor's contact information:**

212 402 5444 Ext 102  
peter@hfhplanning.com

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**Peter D. May CFP®****Educational Background:**

- Date of birth: October 13, 1972
- University of Virginia – BS Commerce, Finance concentration, 1994
- Columbia University Business School – MBA Finance, 2006
- New York University School of Continuing Education – Certificate in Financial Planning, 2015

**Business Experience:**

- HFH Planning - Financial Strategist 49% Owner, 2015 – Present.
- Citigroup – Trader, Structured Credit Derivatives, 2006 – 2014.
- Avaya, Inc – Finance Manager, 2001 – 2003.
- Winstar Communications – Manager, Corporate Development, 2000 – 2001.
- Peace Corps Volunteer, 1999 – 2000.
- J.C. Bradford & Co. – Equity Research Analyst, 1994-1998

**Disciplinary Information: None**

**Other Business Activities:** Co-owner of The Shirley Project Space, an art gallery.

**Additional Compensation: None****Supervision:**

Peter May CFP® is supervised by George Martin Poole CFP®. He reviews Peter D. May's work through our internal network of client data and remote interactions.

**Supervisor's contact information:**

212 402 5444 Ext 101  
martin@hfhplanning.com