



## **HFG Wealth Management, LLC**

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### **Item 1 – COVER PAGE**

This brochure provides information about the qualifications and business practices of HFG Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 832-585-0110 and/or [larry@hfgwm.com](mailto:larry@hfgwm.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. HFG Wealth Management, LLC is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about HFG Wealth Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 - MATERIAL CHANGES**

This Item of the Brochure will discuss only specific material changes made to the Brochure since the firms last Form ADV annual amendment which was in March of 2023.

### **Material Changes:**

Kathryn Bates has been appointed Chief Compliance Officer and Chief Operating Officer.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Larry Harvey, President, at 832-585-0110.

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## Item 4 - ADVISORY BUSINESS

### Advisory Firm Description

HFG Wealth Management, LLC ("HFG" or the "Firm") was established in November 2008 and is an investment advisory firm with its main office located in The Woodlands, Texas. HFG also maintains an office of convenience by appointment only in the Port Arthur area. The Firm provides investment consulting and advanced financial planning services which includes asset allocation and portfolio management services and customized financial planning solutions to its clients. As of December 31, 2023, the Firm had approximately \$\_\_\_\_\_ in assets under management, all managed on a discretionary basis. The principal owner is Mr. Larry Arlen Harvey, ChFC® (see supplemental brochure for details about Mr. Harvey).

### Types of Advisory Services

#### Comprehensive Wealth Management Services

HFG's approach is to help each client individually establish and then reach specific goals while staying within the risk tolerance level indicated by each client. HFG accomplishes this by spending focused time with each client, asking relevant questions, and discussing alternative ideas with the client.

At the beginning of the relationship, HFG meets with the new client, gathers information, performs research and analysis as necessary, and then develops an investment plan that is consistent with the client's desired rate of return, time horizon and risk tolerance. This plan is based upon information provided by the client. HFG considers such factors as:

- the size and source of the account,
- client's identity and background,
- the client's income and growth objectives,
- income tax bracket,
- potential estate taxes, and
- the client's relative risk aversion.

Investment objectives are established and recorded at this time. These objectives and other data are commonly revised or updated over time. HFG further assists its clients in implementing their investment plans by managing portfolios on a discretionary basis. Throughout the relationship, HFG encourages and promotes regular dialogue with clients and with their other advisors, such as attorneys, accountants and other professionals.

#### General Consulting Services

From time to time clients may engage HFG to provide certain services that are more limited in scope than the services provided in the Comprehensive Wealth Management Service described above. Examples include cash flow analysis, evaluation of insurance needs, retirement and/or education planning, business valuation, and other similar services.

### Tailored Advisory Services

Clients have the right to impose certain restrictions on HFG, such as prohibiting the inclusion of certain types of stocks (e.g., “sin stocks”) in a portfolio or prohibiting the sale of certain stocks held in the account at the commencement of the relationship. Such restrictions and guidelines imposed by clients may affect the composition and performance of portfolios. In addition, each client’s portfolio is treated individually, with very specific consideration given to each decision made on its behalf. For these and other reasons, performance of portfolios within the same investment objective may differ and clients should not expect that the performance of their portfolios would be identical with the average client of HFG. *Clients are obligated to promptly notify HFG of any material changes in the client’s financial status, goals and objectives to ensure that HFG’s investment strategies continue to meet the client’s changing needs or to determine if there needs to be a change in the investment objectives and/or strategies. HFG will generally remind clients of this obligation on a regular basis.*

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries 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. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

### Bellatore Financial

We have entered into a Subadviser relationship with Bellatore Financial, Inc. The Subadviser shall provide services that support the ongoing management of client accounts, transaction processing, order taking, reporting, portfolio rebalancing and billing in accordance with the agreement between the parties for a fee. The Subadvisor shall not effect any transactions in violation of its fiduciary obligations, duties or responsibilities under the Advisors Act, if applicable, this Agreement or any other applicable federal or state laws or regulations or the rules of any national securities exchange. We will conduct periodic due diligence of the Subadviser with regard to fees charged and registration requirements.

## **Item 5 - FEES AND COMPENSATION**

### Comprehensive Wealth Management Fees

All clients who engage HFG for Comprehensive Wealth Management Services will pay an initial fee which will be determined and disclosed prior to the start of the engagement, which partially covers the completion of the information gathering process, setting up accounts and other preliminary administrative and planning work required for HFG to support a new client. The client has the right to terminate the contract without penalty within five business days after entering into the contract. Any fees will be refunded within the five-business day period. Additionally, ongoing Comprehensive Wealth Management fees are generally payable quarterly in advance and are charged based on the value of accounts managed at market close on the last day of the prior quarter end, as valued by the custodian.

If management begins after the start of a quarter, fees may be prorated accordingly, with the initial fee charged in arrears at the first quarter close after the engagement and based upon the account market value at the same quarter's close. Fees on deposited funds are charged as the deposits are made and are calculated on a pro rata basis. Fees are calculated based on a percentage of assets under management, as valued by the custodian at the close of market on the last trading day of the quarter and are not calculated based on a percentage of capital gains. The fee schedule for new clients is as follows. Accounts in the same household are normally aggregated and treated as one account for fee billing purposes.

#### Fee Schedule

This fee shall vary between (0.5% and 2.0%) depending on the:

- Market value of the assets under management
- Complexity of the client's financial situation
- Level of management services to be rendered

Fees may be adjusted based on:

- Future consideration of assets under management
- Related accounts
- Other factors as determined by the lead advisor

The Firm generally requires a minimum of \$1,000,000 in investable assets per relationship with a minimum annual fee of \$15,000. If applicable, an administration fee is charged under the section "*Unified Managed Account Program ("UMAP") fees*" below. The Firm reserves the right to charge an initial planning fee as stated in the Investment Advisory Agreement. It is therefore possible that clients receiving the same service from HFG are paying different fees. Advisory fees are negotiable.

Additionally, ongoing Comprehensive Wealth Management fees are generally payable quarterly, in advance and are charged based on the account value at market close of the prior quarter end. If management begins after the start of a quarter, fees may be prorated accordingly, with the initial fee charged in arrears at the first quarter close after the engagement and based upon the account market value at the same quarter's close. Fees on deposited funds are charged as the deposits are made and are calculated on a

pro rata basis, charging for the remaining days in the quarter.

#### General Consulting Fees

The Firm also provides consulting on an as-needed basis outside its other programs, such as business valuation. This service is provided on an hourly basis (at \$400/hour) or as otherwise negotiated and noted on the agreement with the client. There is a minimum two-hour charge for all work billed hourly. Fees are due either upon completion of the consulting work or upon receipt of an invoice.

#### Unified Managed Account Program ("UMAP") Fees

When appropriate to meet the goals and objectives of a client, HFG may recommend the use of a sub-adviser to provide portfolio management, account administrative and reporting services directly to its clients. In these instances, the total fees to be charged by HFG and the sub-adviser will be outlined in separate applicable agreements with the client. In some instances, there may be slight variations internally between the two fees of HFG and a sub-advisor depending on which entity conducts the administrative services provided, however the total fee to the Client will not be impacted. Please see the section titled "Other Financial Industry Activities and Affiliations" for more detailed information on the UMAP program.

#### Other Fees

All fees paid to HFG for investment advisory services are separate and distinct from the fees and expenses charged by mutual and money market funds (described in each fund's prospectus) and ETFs to their shareholders. These fees will generally include an internal management fee and other expenses. Fees paid to HFG are exclusive of all custodial and transaction costs paid to account custodian, brokers, Sub-advisers or other third-party consultants, for which the client is responsible. The client should review all fees charged by mutual funds, ETFs, HFG and others to fully understand the total amount of fees to be paid by the client. Some custodians charge a transaction fee for trading in certain mutual funds, which would not be the case if the client were to have a separate account held directly by the mutual fund company. The custodian charges these fees for the convenience of having access to multiple mutual fund companies through one account. HFG clients may pay such transaction fees to their account custodian.

Smaller portfolios may include investments in funds with no transaction fees. The circumstances under which this class of funds may be used is generally with portfolios ranging from \$50,000 to \$250,000. In some cases, this class of funds may have higher internal expense ratios compared to their institutional class equivalent, however, the client's choices are not limited. The clients have the same investment choices as other clients in the portfolio allocation model.

#### Termination

Should the client choose to terminate the engagement prior to completion of the aforementioned preliminary administrative work, HFG will prorate the unused portion of the initial minimum fee, as determined by the amount of time spent to date on the planning process, charging work completed to date at an hourly rate not to exceed \$400

per hour.

In the event of termination, any paid but unearned fees will be promptly refunded to the client, and any fees due to HFG from the client will be invoiced. A client may terminate the agreement within the initial 5 days without incurring any fees. Either party may terminate this Agreement at any time by giving thirty (30) days prior written notice of such termination to the other party.

## **Item 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

### *Sharing of Capital Gains*

HFG 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 a higher degree of risk to the client. However, the nature of asset-based fees allows HFG to participate in the growth of the client's wealth. This also means that our fees can decline when the client's portfolio declines in value.

The firm does not participate in side-by-side management.

## **Item 7 - TYPES OF CLIENTS**

HFG generally provides investment advice to individuals, high net worth individuals, families, trusts and estates. Advice may extend to entities related to the client such as small businesses and charitable organizations, including foundations and endowments. Client relationships vary in scope and length of service.

## **Item 8 - ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### *Investment Committee*

HFG has an Investment Advisory Committee. This team consists of Mr. Larry Harvey, ChFC®, President, Henry Pizzutello, CIO, and Kevin Bruce, CFP®, CFA. Accounts are generally managed in models developed by the Investment Advisory Committee. Although these analysts provide useful inputs to HFG's portfolio and model construction, Mr. Larry Harvey determines the final composition and management of all portfolios available to HFG clients. Please see the section titled "Other Financial Industry Activities and Affiliations" for more detailed information on the services Bellatore provides to HFG and HFG clients as directed by HFG.

### *Methods of Analysis*

HFG may also use a combination of the following types of analysis in evaluating investments for client accounts:

- Fundamental Analysis —Analysis of financial attributes of a company or



- security such as revenue growth, debt to equity ratio, inventory turnover, etc.
- Technical Analysis —Analysis which assumes past performance is a predictor of future performance
  - Cyclical Analysis - Analysis of up and down-market cycles

HFG uses the following sources of information in its analysis:

- Annual reports, prospectuses, filings with the Securities and Exchange Commission
- Company press releases
- Financial newspapers and magazines
- Research materials prepared by others
- Corporate rating services

### Investment Strategies

The investment strategies HFG uses to implement investment advice include the following:

- Long-term purchases (securities held at least a year)
- Short-term purchases (securities sold within a year)

HFG primarily makes use of Exchange Traded Funds (ETFs), Exchange Traded Notes (ETNs), and institutional mutual funds to construct a portfolio most suitable to meet the client's goals and objectives within the client's individual risk tolerance. On a more limited basis, HFG also purchases individual common stocks and corporate, government and municipal bonds. When suitable, HFG may recommend the use of a separate account manager(s) (each a "Sub-adviser(s)"). Investments may include those representing hedging strategies and commodities investments.

### Risk of Loss

HFG does not guarantee the future performance of the account or any specific level of performance, the success of any investment decision or strategy that the Firm may use, or the success of the Firm's overall management of the account. The client understands that investment decisions made for the client's account by the Firm are subject to various market, currency, economic, political and business risks, and that those investment decisions will not always be profitable. The client understands that investing in any security entails risk of loss.

## **Item 9 - DISCIPLINARY INFORMATION**

HFG has not been subject to any disciplinary matters.

## **Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

Bellatore Financial, Inc. and HFG Wealth Management, LLC. Are affiliated through common ownership. Mr. Harvey is a majority equity stakeholder and CEO of Bellatore

Financial Inc., ("Bellatore"), a registered investment advisory firm. As stated in Item 4, HFG and Bellatore have entered into a subadvisor relationship. Bellatore provides back office support to other investment advisors and their clients. Bellatore provides portfolio construction, asset allocation guidance and strategies, trading and rebalancing services for HFG's review and approval. In addition, Bellatore produces performance reports, executes tasks relating to the administration of accounts, such as facilitating the opening of accounts, transferring funds and executing trades in accordance with the investment plan developed by and at the direction of HFG. HFG's recommendation of Bellatore for account administration might create a potential conflict of interest since Mr. Harvey is a shareholder of Bellatore. HFG manages this conflict of interest by monitoring the fees charged by Bellatore vs. alternative offerings and fees for similar services in the market to ensure they are fair.

Mr. Harvey is also a principal owner of Bellatore Holdings, Inc. (formerly Bella Fund Holdings), which is a shareholder of Bellatore Financial Inc. Mr. Harvey is a member of Sable Ventures, LLC and Sable Assets, LLC.

Mr. Harvey and Mr Guinn are licensed to sell insurance to clients. Larry Harvey may recommend variable annuities on a fee-only basis. Both maintain license arrangements with several insurance companies as necessary to meet the needs of clients and operates as an independent agent without any special arrangement with any particular insurance company. When the client and the representative of HFG agree that a client has an insurance need, the representative will typically earn the normal fees associated with the insurance products. Mr. Harvey and Mr Guinn receive compensation for the sale of term life insurance. The policy of HFG is to disclose to the client any fee that will be earned on the sale of insurance prior to completing the transaction.

To the extent that HFG's financial planning process results in the recommendation of insurance products, provision of such products may entail a conflict of interest with HFG clients as there exists an incentive for an HFG representative to potentially recommend insurance products based on the compensation received, rather than based on the client's needs. HFG manages this conflict of interest by monitoring the suitability of such products as a portion of the client's investment needs, by utilizing insurance products only where it is in the client's best interest, and after consultation, which includes the disclosure of such potential conflicts in accordance with our fiduciary duty as the client's adviser. The client always has the right to decide to act on an insurance recommendation made by Mr. Harvey, and if they do decide to purchase, they are free to purchase from any insurance agent of their choice.

Mr. Pizzutello is the Chief Investment Officer and Chief Compliance Officer of Bellatore Financial Inc. This can be seen as a conflict of interest and the Firm addresses its fiduciary duty by maintaining oversight of Mr. Pizzutello's securities activities and outside business activities.

<b>Item 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING</b>
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HFG has adopted a Code of Ethics ("Code"), the full text of which is available to clients upon request. HFG has several goals in adopting this Code. First, the Firm desires to

comply with all applicable laws and regulations governing its practice. The Firm believes that compliance with such regulations is a signal to clients that clients' interests come first and that we support the efforts of those organizations dedicated to upholding the law.

Next, the management of HFG has determined to set forth guidelines for professional standards, under which all associated persons are to conduct themselves. HFG has set high standards, the intention of which is to protect client interests at all times and to demonstrate HFG's commitment to the Firm's fiduciary duties of honesty, good faith and fair dealing with clients. All associated persons are expected to adhere strictly to these guidelines, as well as to the procedures for approval and reporting established in the Code. HFG has instituted, as a deterrent, a policy of disciplinary actions to be taken with respect to any associated person who violates the Code.

Finally, HFG has adopted specific policies and procedures designed to assist in the implementation of the guidelines outlined in the Code. This also includes policies and procedures relating to the required approval and reporting of the personal securities transactions of our personnel; required holdings reports for personnel; insider trading education and prohibitions; and client privacy protection. Personal trades on the same day in securities being traded or under consideration for trades on behalf of clients may only be placed by Firm personnel in the event the client receives the same or better price.

Employees are also required to report any outside business activities generating revenue. If any are deemed to be in conflict with clients, such conflicts will be fully disclosed, or the employee will be directed to cease this activity.

To request a written copy of HFG's Code of Ethics free of charge, please contact us at 832-585-0110 or email us at [service@hfgwm.com](mailto:service@hfgwm.com).

## **Item 12 - BROKERAGE PRACTICES**

### **Selection of Brokers and Custodians**

In selecting brokers, custodians and negotiating commission rates, HFG considers various factors, including:

- Knowledge of and dominance in specific markets, securities and industries
- Quality of execution
- Commission structure
- Ability to locate liquidity
- Research services provided
- Acceptable record-keeping
- Reputation and integrity

Consistent with its fiduciary obligations, HFG seeks best execution for client transactions, which it defines as seeking the best price for a security in the marketplace as well as ensuring that, in executing client transactions, clients do not incur unnecessary brokerage costs and charges. HFG is not obligated to get the lowest possible commission cost, but rather, determines whether the transaction represents the

best qualitative execution for clients under the circumstances in which the trades are placed. Under normal circumstances, HFG will select the broker/dealer for all trades made on behalf of discretionary clients and will generally trade through the account custodian in order to minimize transaction costs. HFG evaluates best execution on a client-by-client basis, rather than a trade-by-trade basis, and monitors the entire relationship with the custodian in light of its responsibility to attain best execution for all of its clients.

### **Research and Other Soft-Dollar Benefits**

HFG has no formal soft dollar benefits, where part of the transaction costs generated by client trades are used to pay for research and services provided to HFG, however, HFG receives benefits from the account custodian as a result of the assets held with the client account custodian.

We recommend that our clients use Charles Schwab & Co., Inc. (Schwab) as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we/you instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them.

### **Brokerage for Client Referrals**

The Firm does not accept referrals from any broker/dealer in exchange for any preferential brokerage business.

### **Directed Brokerage**

Clients may direct HFG to use a particular broker/dealer for custodial or transaction services on behalf of the client's portfolio. Depending on the choice made by the client, HFG may or may not have the opportunity to negotiate commissions paid by the client, and HFG's ability to obtain best execution may be impaired. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker/dealer. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative broker/dealers are used. While every effort is made to treat every client equally, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers may in fact result in a certain degree of delay in executing trades and otherwise effectively managing the account(s).

### **Products and Services Available to Us from Schwab**

Schwab's business serves independent investment advisory firms like us. They provide us and our clients with access to brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab

also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us as long as we keep our clients' assets in accounts at Schwab.

### **Your Brokerage and Custody Costs**

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Your accounts at Schwab benefit because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab may 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 account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

### **Our Interest in Schwab's Services.**

The availability of these services from Schwab benefit us because we do not have to produce or purchase them. We do not have to pay for Schwab's services so long as we keep client assets in accounts at Schwab. This 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 potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab's services based on the factors discussed above.

### **Benefits Received from Schwab.**

Schwab will provide the following: i) services to support the transition and opening of accounts to and from HFG, and ii) technology, marketing, research and compliance related expenses. The Adviser has no obligation to deal with any broker or group of brokers in executing transactions in portfolio securities.

### **Trade Aggregation**

As a general policy, HFG attempts to trade as a firm – to trade in such a manner that its clients and products are not competing against one another in the marketplace. At the Firm's discretion, client trades may be bunched in a single order (a "block") in an effort to obtain best execution at the best security price available.

If a block order is filled (full or partial fill) at several prices through multiple trades, an

average price will be calculated for all trades executed, and all participants in the block trade will receive the average price. Only trades executed within the block on the single day may be combined for purposes of calculating the average price. There is no transaction fee advantage to enacting block trades through Schwab. Rather than charging one fee for the blocked trade, Schwab charges transaction fees to each account as if the trade had been placed on an account by account basis.

While this policy is applied consistently, HFG may deviate from this policy if it determines the standard method of aggregating or allocating trades would result in unfair or inequitable treatment to some or all of its clients.

### **Private Placements**

At times HFG may recommend that its clients invest in private placements. Prior to such recommendation, each client must be able to demonstrate that he or she meets the established eligibility requirements of the offering.

## **Item 13 - REVIEW OF ACCOUNTS**

Currently, HFG reviews accounts at least quarterly and meets with clients at regularly scheduled intervals to determine if the client's needs and objectives are being met. Changes in guidelines, market conditions, and cash needs may trigger additional reviews. Specific security holdings are monitored for conditions on a day-to-day basis.

Specific goals and objectives are designed by the client through the financial profile and are established for portfolio positioning and diversification. All financial planning clients will be reviewed at least quarterly by the Firm's registered investment advisor representatives. Significant changes in their personal circumstances, the general economy, or tax law changes can trigger more frequent reviews.

Clients are provided quarterly reports showing portfolio holdings, transactions and performance. Each quarterly statement will summarize the specific investment currently held and the value of the client's portfolio.

## **Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

HFG does not participate in any form of compensation for referrals at this time. HFG may suggest the CPA firm, Brammer Begnaud & Lattimore, CPAs, for tax services in the Beaumont/Port Arthur area. If the client decides to engage the services of Brammer Begnaud & Lattimore, CPAs, they will sign an agreement with the accounting firm directly and may receive a discount on their taxes (up to 20%). Brammer Begnaud & Lattimore, CPAs does not compensate HFG for any referrals. Should clients meet certain criteria for investable assets, HFG, at its discretion, may pay Brammer Begnaud & Lattimore, CPAs, for the tax services on behalf of the client. Clients are notified at the beginning of the relationship of this arrangement with HFG.

Kevin Bruce has entered into an advertising agreement with The Lampo Group, LLC d/b/a Ramsey Solutions™ (referred to as "RS" or "Smart Vestor™"). Kevin Bruce pays a flat fee to RS for advertising through RS, both online and locally. This advertising service may result in the introduction to or acquisition of clients. RS does not warrant any

services of HFG or any SmartVestor™ Pro and makes no claim or promise of any result or success by retaining HFG. The investors decision to retain the services of HFG at the investor's sole discretion and risk.

#### **Item 15 - CUSTODY**

All clients have the opportunity to select the custodian of their choice; however, clients in need of custodial services will generally have Charles Schwab & Co., Inc ("Schwab") recommended to them. Although HFG may recommend that clients establish accounts at Schwab, the final decision as to where to custody assets rests with the client.

Because HFG generally has the authority to instruct the account custodian to deduct the investment management fee directly from the client's account, HFG is considered to have "custody" of client assets. Custody is defined as having any access to client funds or securities. This limited access is monitored by the client through receipt of account statements directly from the custodian. These statements all show the deduction of the management fee from the account. Otherwise, HFG may only direct the movement of funds from one account in the client's name to another such titled account but has no other access to funds.

All clients receive monthly statements directly from the qualified custodian holding their accounts. When clients receive their statements from the account custodian, clients should carefully review those statements and take the time to compare them with those they receive from HFG. If the client finds significant discrepancies, the custodian and HFG should be notified.

#### **Item 16 - INVESTMENT DISCRETION**

Once HFG has established the overall investment plan for a client, the portfolio is implemented and maintained on a discretionary basis. Under such an arrangement, HFG has the authority to supervise and direct the portfolio without prior consultation with the client.

With rare exception, with respect to those discretionary accounts that HFG manages on a continuous basis, HFG will normally have full trading authority under a limited power of attorney. As a result, HFG will determine which securities are to be bought and sold, the amount of the securities to be bought and sold, and the timing of such transactions.

In cases where HFG recommends the use of a sub-adviser(s), the sub-adviser(s) will be granted discretionary trading authority to provide investment supervisory services for the portfolio. HFG retains the authority to terminate the sub-adviser's relationship or to add new sub-advisers without specific client consent. With respect to assets managed by a sub-adviser, HFG's role will be to monitor the overall financial situation of the client, to monitor the investment approach and performance of the sub-adviser(s), and to assist the client in understanding the investments of the portfolio.

#### **Item 17 - VOTING CLIENT SECURITIES**

HFG does not vote client securities for its clients. Clients receive proxy material directly from their account custodian by either email or U.S. mail. Clients may address questions concerning a proxy matter to Firm personnel.

#### **Item 18 - FINANCIAL INFORMATION**

HFG is not required to provide its financial statements. However, the Firm has no current financial condition that might affect its ability to provide services to its clients. In addition, we do not require or solicit pre-payment of advisory fees in the amount of more than \$1,200 per client, and six months or more in advance.

#### **Other - PRIVACY AND BUSINESS CONTINUITY**

##### **Privacy Notice to Customers**

We do not disclose nonpublic personal information about our individual clients or former clients except as permitted by law. We restrict access to nonpublic personal information about you (that we may obtain from your account and your transactions) to those employees who need to know that information to provide products or services to you or to alert you to new, enhanced or improved products or services we provide. We maintain physical, electronic and procedural safeguards that comply with federal standards to safeguard your nonpublic personal information

##### **Business Continuity Plan**

We have a Business Continuity Plan that addresses how the Firm will respond to events that may disrupt its business. If the main telephone line is inactive, please contact us at [service@hfgwm.com](mailto:service@hfgwm.com). If you are unable to reach us and it is an emergency, please contact your custodian. We will resume operations as quickly as possible (preferably within twenty-four hours) depending on the severity of the business disruption. Our Business Continuity Plan covers data backup and recovery, mission critical systems financial and operational assessments, alternative communications, alternate business locations, regulatory reporting and the assurance of prompt access to funds and securities for our customers. Additional details regarding the firm's Business Continuity Plan are available upon request.