

Hoey Investments, Inc.

Brochure

Dated: March 13, 2024

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Officer

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This brochure provides information about the qualifications and business practices of Hoey Investments, Inc. If you have any questions about the contents of this brochure, please contact us at 610-738-4280 or FHoey@HoeyInvestments.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 Hoey Investments, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov

References herein to Hoey Investments, Inc. as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.

Item 2 Material Changes

There have been no material changes made to this Brochure since our last annual amendment filing on March 25, 2023.

Item 3 Table of Contents

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

Item 4 Advisory Business

Firm

Hoey Investments, Inc. (“Hoey” or the “Advisor”) is an independently owned SEC-registered advisor. The firm was founded in January 2008 and has one office located in Coatesville, Pennsylvania. It was established by Francis Hoey, who is the majority owner of the firm and serves as President and firm Principal.

Hoey Investments provides investment advisory services on a discretionary basis to its clients (individuals, pension and profit-sharing plans, business entities, trusts, estates and charitable organizations, etc.), and, if requested, financial planning and related consulting services.

Services

INVESTMENT ADVISORY SERVICES: Hoey Investments offers investment management services based on the individual goals, objectives, time horizon and risk tolerance of each client. Advisory services include, but are not limited to:

- Investment Strategy/Objective
- Asset Allocation
- Asset Selection
- Regular Portfolio Monitoring

The firm primarily allocates client investment assets among various individual equities (stocks), debt (bonds) and fixed income securities, mutual funds and/or exchange traded funds (“ETFs”).

FINANCIAL PLANNING AND CONSULTING SERVICES: Hoey Investments may provide financial planning and/or consulting services (e.g., estate planning, insurance planning, etc.) on a stand-alone fee basis. The firm does not serve as an attorney or accountant and therefore does not prepare estate planning documents or tax returns. If requested by the client, Hoey may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional, retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the firm. *If the client engages any such recommended professional, and a dispute arises thereafter relative to*

such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

POTENTIAL CONFLICTS OF INTEREST:

Limitations of Financial Planning and Non-Investment Consulting Services: As indicated above, to the extent requested by a client, Hoey Investments may provide financial planning and related consulting services. Neither Hoey Investments nor our adviser representatives assist clients with the implementation of any financial plan, unless agreed to do so in writing. Hoey Investments does not monitor a client's financial plan, and it is the client's responsibility to revisit the financial plan with us, if desired.

Hoey Investments may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. We do not serve as an attorney or accountant, and no portion of Hoey Investments' services should be construed as legal or accounting services. Accordingly, Hoey Investments does not prepare estate planning documents or tax returns. To the extent requested by you, Hoey Investments may recommend the services of other professionals for certain non-investment implementation purpose (i.e., attorneys, accountants, insurance agents, etc.), including certain of our representatives in their separate individual capacities as licensed insurance agents. You are under no obligation to engage the services of any such recommended professional. You retain absolute discretion over all such implementation decisions and are free to accept or reject any recommendation from us and/or our representatives.

If you engage any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, you agree to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional(s) (i.e., attorney, accountant, insurance agent, etc.) shall be responsible for the quality and competency of the services they provide.

Retirement Plans: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Hoey Investments recommends that a client roll over their retirement plan assets into an account to be managed by Hoey Investments, such a recommendation creates a conflict of interest if Hoey Investments will earn new (or increase its current) compensation as a result of the rollover. If Hoey Investments provides a recommendation as to whether a client should engage in a rollover or not (whether it is from an employer's plan or an existing IRA), Hoey Investments 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. No client is under any obligation to roll over retirement plan assets to an account managed by Hoey Investments, whether it is from an employer's plan or an existing IRA.

Mutual Funds and Exchange Traded Funds: Hoey Investments may recommend allocating investment assets to mutual funds or exchange traded funds. Most mutual funds and exchange traded funds are available directly to the public. Therefore, a prospective client can obtain many of the funds that may be utilized by Hoey Investments

independent of engaging the firm as an investment advisor. However, if a prospective client determines to do so, he/she will not receive Hoey Investment's initial and ongoing investment advisory services.

Portfolio Activity: Hoey Investments has a fiduciary duty to provide services consistent with the client's best interest. Hoey Investments will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Hoey Investments determines that changes to a client's portfolio are unnecessary. Clients remain subject to the fees described in Item 5 below during periods of portfolio inactivity. Of course, as indicated below, there can be no assurance that investment decisions made by Hoey Investments will be profitable or equal any specific performance level(s).

Cryptocurrency: For clients who want exposure to cryptocurrencies, including Bitcoin, Hoey Investments, may advise the client to consider a potential investment in corresponding exchange traded securities, or an allocation to separate account managers and/or private funds that provide cryptocurrency exposure. Crypto is a digital currency that can be used to buy goods and services but uses an online ledger with strong cryptography (i.e., a method of protecting information and communications through the use of codes) to secure online transactions. Unlike conventional currencies issued by a monetary authority, cryptocurrencies are generally not controlled or regulated and their price is determined by the supply and demand of their market. Because cryptocurrency is currently considered to be a speculative investment, Hoey Investments will not exercise discretionary authority to purchase a cryptocurrency investment for client accounts. Rather, a client must expressly authorize the purchase of the cryptocurrency investment.

Hoey Investments does not recommend or advocate the purchase of, or investment in, cryptocurrencies. Hoey Investments considers such an investment to be speculative.

Clients who authorize the purchase of a cryptocurrency investment must be prepared for the potential for liquidity constraints, extreme price volatility and complete loss of principal.

Cash Positions: Hoey Investments continues to treat cash as an asset class. As such, unless Hoey Investments determines to the contrary, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating our advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), Hoey Investments may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, our advisory fee could exceed the interest paid by the client's money market fund.

Cash Sweep Accounts: Certain account custodians can require that cash proceeds from account transactions or new deposits, be swept to and/or initially maintained in a specific custodian designated sweep account. The yield on the sweep account will generally be lower than those available for other money market accounts. When this occurs, to help mitigate the corresponding yield dispersion Hoey Investments shall (usually within 30 days thereafter) generally (with exceptions) purchase a higher yielding

money market fund (or other type security) available on the custodian's platform, unless Hoey Investments reasonably anticipates that it will utilize the cash proceeds during the subsequent 30-day period to purchase additional investments for the client's account. Exceptions and/or modifications can and will occur with respect to all or a portion of the cash balances for various reasons, including, but not limited to the amount of dispersion between the sweep account and a money market fund, the size of the cash balance, an indication from the client of an imminent need for such cash, or the client has a demonstrated history of writing checks from the account.

The above does not apply to the cash component maintained within a Hoey Investments actively managed investment strategy (the cash balances for which shall generally remain in the custodian designated cash sweep account), an indication from the client of a need for access to such cash, assets allocated to an unaffiliated investment manager and cash balances maintained for fee billing purposes.

The client shall remain exclusively responsible for yield dispersion/cash balance decisions and corresponding transactions for cash balances maintained in any Hoey Investments unmanaged accounts.

eMoney Advisor Platform: Hoey Investments may provide its clients with access to an online platform hosted by "eMoney Advisor" ("eMoney"). The eMoney platform allows a client to view their complete asset allocation, including those assets that Hoey Investments does not manage (the "Excluded Assets"). Hoey Investments does not provide investment management, monitoring, or implementation services for the Excluded Assets. Unless otherwise specifically agreed to, in writing, Hoey Investments' service relative to the Excluded Assets is limited to reporting only. Therefore, Hoey Investments shall not be responsible for the investment performance of the Excluded Assets. Rather, the client and/or their advisor(s) that maintain management authority for the Excluded Assets, and not Hoey Investments, shall be exclusively responsible for such investment performance. Without limiting the above, Hoey Investments shall not be responsible for any implementation error (timing, trading, etc.) relative to the Excluded Assets. The client may choose to engage Hoey Investments to manage some or all of the Excluded Assets pursuant to the terms and conditions of an Investment Advisory Agreement between Hoey Investments and the client. The eMoney platform also provides access to other types of information and applications including financial planning concepts and functionality, which should not, in any manner whatsoever, be construed as services, advice, or recommendations provided by Hoey Investments. Finally, Hoey Investments shall not be held responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the eMoney platform without Hoey Investments' assistance or oversight.

Client Obligations: In performing our services, Hoey Investments shall not be required to verify any information received from you or from your other professionals and is expressly authorized to rely thereon. Moreover, you are advised that it remains your responsibility to promptly notify Hoey Investments if there is ever any change in your financial situation or investment objectives for the purpose of reviewing, evaluating or revising our previous recommendations and/or services.

Cybersecurity Risk: The information technology systems and networks that Hoey Investments and its third-party service providers use to provide services to Hoey Investments' clients employ various controls, which are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could

cause significant interruptions in Hoey Investments' operations and result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and Hoey Investments are nonetheless subject to the risk of cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damage to respond to regulatory obligations, other costs associated with corrective measures, and loss from damage or interruption to systems. Although Hoey Investments has established procedures to reduce the risk of cybersecurity incidents, there is no guarantee that these efforts will always be successful, especially considering that Hoey Investments does not directly control the cybersecurity measures and policies employed by third-party service providers. Clients could incur similar adverse consequences resulting from cybersecurity incidents that more directly affect issuers of securities in which those clients invest, broker-dealers, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions.

Borrowing Against Assets/Risks: A client who has a need to borrow money could determine to do so by using:

- Margin-The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money, and uses the assets in the client's brokerage account as collateral; and,
- Pledged Assets Loan- In consideration for a lender (i.e., a bank, etc.) to make a loan to the client, the client pledges investment assets held at the account custodian as collateral.

These above-described collateralized loans are generally utilized because they typically provide more favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client's investment assets. The lender (i.e., custodian, bank, etc.) will have recourse against the client's investment assets in the event of loan default or if the assets fall below a certain level. For this reason, Hoey Investments does not recommend such borrowing unless it is for specific short-term purposes (i.e., a bridge loan to purchase a new residence). Hoey Investments does not recommend such borrowing for investment purposes (i.e., to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin or a pledged assets loan, the following economic benefits would inure to Hoey Investments:

- by taking the loan rather than liquidating assets in the client's account, Hoey Investments continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by Hoey Investments, Hoey Investments will receive an advisory fee on the invested amount; and,
- if Hoey Investments' advisory fee is based upon the higher margined account value, Hoey Investments will earn a correspondingly higher advisory fee. This could provide Hoey Investments with a disincentive to encourage the client to discontinue the use of margin.

The Client must accept the above risks and potential corresponding consequences associated with the use of margin or a pledged assets loan.

Disclosure Statement: A copy of our written Brochure and Client Relationship Summary, as set forth on Part 2 of Form ADV and Form CRS respectively, shall be provided to you prior to, or contemporaneously with, the execution of our advisory agreement.

Client Tailored Services and Client Imposed Restrictions

Hoey Investments creates an Investment Objective Statement based on each client's current situation (income, tax level, time horizon and risk tolerance level). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses and other administrative fees. Hoey Investments does not sponsor or participate in any wrap fee programs.

Assets Under Management

As of December 31, 2023, Hoey Investments managed approximately \$427,460,751 in assets, all of which were discretionary assets.

Item 5 Fees and Compensation

Fee Calculation

INVESTMENT ADVISORY SERVICES: Hoey Investments' advisory fees are charged quarterly in advance at an annual rate, generally between 1.00% and 1.50%. The fee is calculated based on the market value of a client's assets under management as of the last business day of the quarter. Fees are not pro-rated for cash flows, but unearned fees are refunded to clients upon termination of the advisory relationship. Fees may vary depending upon various factors, e.g., the amount of assets to be invested, the complexity of the engagement, the anticipated number of meetings and servicing needs, related accounts, future earning capacity, anticipated future additional assets, and negotiations with the client. Hoey Investments does not generally require an annual minimum fee or asset level for investment advisory services.

Depending upon perceived or anticipated market conditions/events, the Advisor may maintain cash positions for defensive purposes. All cash positions (money markets, etc.) are included as part of assets under management for purposes of calculating the advisory fee.

FEE DIFFERENTIALS: Hoey Investments prices its services based on various objective and subjective factors. As a result, Hoey Investment's clients could pay diverse fees based upon the market value of their assets, the complexity of the engagement, and the level and scope of the overall financial planning and/or consulting services to be rendered. The services to be provided by Hoey Investments to any particular client could be available from other advisors at lower fees. All clients and prospective clients should be guided accordingly.

FINANCIAL PLANNING AND CONSULTING SERVICES: If requested by a client, Hoey Investments may provide financial planning and/or consulting services on a stand-alone fee basis. Planning and consulting fees are negotiable, but generally range from \$1,000 to \$4,000 on a fixed fee basis, depending upon the level and scope of the service(s) required and the professional(s) rendering the service(s).

Fee Payment

Fees are billed quarterly in advance. Generally, clients' management fees are withdrawn directly from the clients' custodial accounts with clients' written authorization. If the client is billed directly, payment is due upon receipt of the advisor's invoice.

Other Expenses

Hoey Investments' fees do not include brokerage commissions, transaction fees, and other related expenses which will be incurred by the client. These fees may include charges imposed by custodians, brokers, wire transfer and electronic fund fees, etc. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. These charges, fees and commissions are exclusive of and in addition to Hoey Investments' fee, and Hoey Investments does not receive any portion of these costs.

Broker-dealers such as Charles Schwab & Co., Inc. ("Schwab") charge brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian.

While certain custodians, including Schwab, generally (with exceptions) do not currently charge fees on individual equity transactions (including ETFs), others do.

There can be no assurance that Schwab will not change its transaction fee pricing in the future. Schwab may also assess fees to clients who elect to receive trade confirmations and account statements by regular mail rather than electronically.

Fee Reimbursement

Upon termination of the client relationship, the advisor will refund the pro-rated portion of the advanced advisory fee paid, based on the number of days remaining in the billing quarter.

Other Compensation

Neither the firm, nor its representatives accept compensation from the sale of securities or other investment products.

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

Hoey Investments does not accept performance-based fees and does not engage in side-by-side management.

Item 7 Types of Clients

Hoey Investments' clients may include individuals, pension and profit-sharing plans, business entities, trusts, estates and charitable organizations.

Item 8 Methods of Analysis, Investment Strategies & Risk of Loss

Analysis

Hoey Investments utilizes the following methods of security analysis:

- **Charting** - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- **Fundamental** - (analysis performed on historical and present data, with the goal of making financial forecasts)
- **Technical** – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

Strategies

Hoey Investments utilizes the following strategies:

- **Long Term Purchases** - Securities held at least a year.
- **Short Term Purchases** - Securities held less than a year.

PORTFOLIO ACTIVITY: Hoey Investments has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Hoey Investments will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when Hoey Investments determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, there can be no assurance that investment decisions made by Hoey Investments will be profitable or equal any specific performance levels.

Risk of Loss

Investing in any security involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Any investment is subject to risks, including the possible loss of the principal amount invested. There can be no assurance that any strategy in which a client invests will be successful in meeting its investment objective.

- **General Market Risk** - The success of any investment activity is influenced by general economic conditions, which may affect volatility and the extent and timing of investor participation in the markets. Unexpected volatility or illiquidity in the markets in which clients directly or indirectly hold positions could impair the client's ability to trade and could result in losses. In addition, an economic downturn in the United States or around the world may cause declines in the securities markets resulting in decreases in the value of the securities held by our clients. **Market Segment Risk** - While we generally attempt to diversify our clients' portfolios across industries, Hoey Investments may invest any amount of its assets in one or more particularized industries or sectors of the economy (e.g., telecommunications, utilities, etc.). Industry and sector markets, like the national economy as a whole, tend to be cyclical. If the client is substantially invested in a particular sector which experiences an unanticipated decline, performance may suffer accordingly.
- Hoey Investments' methods of analysis and investment strategies do not present any significant or unusual risks. An accurate market analysis can only produce a

forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Hoey Investments' primary investment strategies - Long Term Purchases and Short Term Purchases - are fundamental investment strategies. Longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

- Currently, Hoey primarily allocates client investment assets among various individual equity (stocks), debt (bonds) and fixed income securities, mutual funds and/or ETFs on a discretionary basis in accordance with the client's designated investment objective(s).

Item 9 Disciplinary Information

Hoey Investments (including its principal and all other employees) has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

- Neither the firm, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- Neither the firm, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- The firm's Principal, Francis Hoey, is a licensed insurance agent, and may recommend the purchase of insurance-related products on a commission basis. Clients may engage Mr. Hoey to effect insurance transactions on a commission basis.

Conflict of Interest: The recommendation by the firm or its representatives that a client purchase an insurance product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission insurance product from Mr. Hoey. Clients are reminded that they may purchase insurance products

recommended by the advisor through other, non-affiliated insurance agents.

- Hoey Investments does not recommend or select other investment advisors for its clients.

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

Code of Ethics

Hoey Investments has a written Code of Ethics, which establishes a standard of business conduct for all of the firm's employees that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

Recommendations Involving Material Financial Interests

Neither the firm nor any related person of the firm recommends, buys, or sells for client accounts, securities in which the firm or any related person has a material financial interest.

Investing Personal Money in the Same Securities as Clients

Hoey Investments or its employees may buy or sell securities at or around the same time that are also recommended to clients. This may provide an opportunity for employees of Hoey Investments to buy or sell securities before or after recommending securities to clients. Such transactions may create a conflict of interest; however, the firm will never engage in trading to the client's disadvantage when similar securities are being bought or sold.

Item 12 Brokerage Practices

Factors Considered in Selecting Broker/Dealers and Custodians

- In the event that the client requests that Hoey Investments recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Hoey Investments to use a specific broker-dealer/custodian), Hoey Investments generally recommends that investment management accounts be maintained at Schwab. Prior to engaging Hoey Investments to provide investment management services, the client will be required to enter into a formal Agreement with Hoey Investments setting forth the terms and conditions under which Hoey Investments shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.
- Factors that Hoey Investments considers in recommending Schwab (or another broker-dealer/custodian, investment platform and/or mutual fund sponsor) include historical relationship with Hoey Investments, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Hoey Investments' clients shall comply with Hoey Investments' duty to seek best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Hoey Investments determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of broker-dealer services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Hoey Investments will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Hoey Investments' investment management fee. Hoey Investments' best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close
- Research and Additional Benefits: Hoey Investments receives research, products and other services from Schwab in connection with client securities transactions. All of these benefits, without cost (or at a discount), assist the firm to better service client accounts. Benefits may include: investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by the firm in furtherance of its investment advisory business operations. Specifically, the firm may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular research, products or services.

- There is no corresponding commitment made by the advisor to Schwab or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.
- Hoey Investments does not receive referrals from broker-dealers.
- Hoey Investments does not generally accept client-directed brokerage arrangements. In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Hoey Investments will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Hoey. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

Aggregating Trades for Multiple Client Accounts

If Hoey Investments buys or sells the same securities on behalf of more than one client, it might, but is not obligated to combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the clients, differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions would be averaged as to price and allocated among clients in proportion to the purchase/sale orders placed for each client account. However, aggregating orders at *Schwab* does not result in less commission or transaction fees.

Item 13 Review of Accounts

Frequency and Nature of Periodic Reviews

All client investment accounts are reviewed periodically by Francis Hoey, Principal with regard to clients' investment policies, security performance and tax issues. All clients are encouraged to review financial planning issues, investment objectives and account performance with the advisor on an annual basis.

Factors Triggering a Non-Periodic Review

Portfolio reviews may be triggered by a change in a client's financial situation, by client request, material market, economic or political events.

Content & Frequency of Reports Provided to Clients

Each client receives at least quarterly, a written report that details the client's account including assets held, asset value and performance of the assets. Each client also receives at least quarterly, a written statement of assets and transactions directly from the custodian. As well, clients may access holdings and transaction reports on-line at any time from the custodian's website.

Item 14 Client Referrals and Other Compensation

Hoey Investments does not receive any economic benefit, directly or indirectly from any third party for advice rendered to its clients. Hoey Investments does not provide compensation for client referrals.

Item 15 Custody

Because it deducts fees directly from client accounts, Hoey Investments is deemed to have limited custody of client assets and must have written authorization from the client to do so.

Hoey Investments provides other services on behalf of its clients that require disclosure at ADV Part 1, Item 9. In particular, certain clients have signed asset transfer authorizations that permit the qualified custodian to rely upon instructions from Hoey Investments to transfer client funds to "third parties." In accordance with the guidance provided in the SEC Staff's February 21, 2017 Investment Adviser Association No-Action Letter, the affected accounts are not subjected to an annual surprise CPA examination.

Clients are provided account statements including quarterly billing amounts and are urged to compare any statement or report provided by the firm with the account statements provided by the custodian.

Item 16 Investment Discretion

Hoey Investments provides discretionary investment advisory services to clients. The Investment Advisory Contract signed with each client names Hoey Investments as the client's attorney and agent in fact. This grants the firm full authority to manage the client's account, make investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share.

Clients who engage the firm on a discretionary basis may, at any time, impose restrictions, in writing, on the firm's discretionary authority (i.e., limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase or sell certain securities, limit or proscribe the firm's use of margin, etc.).

Item 17 Voting Client Securities

Hoey Investments will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients may contact the firm to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

Balance Sheet

Hoey Investments neither requires nor solicits fees of more than \$1,200, per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

Financial Condition

Neither Hoey Investments nor its management has any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to clients.

Bankruptcy

Hoey Investments has not been the subject of a bankruptcy petition.