

DISCLOSURE BROCHURE



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This brochure provides information about the qualifications and business practices of Hahn Financial Group, Inc. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 605-275-3600. 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 Hahn Financial Group, Inc. (CRD #169787) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 30, 2019

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

This update is in accordance with the annual filing requirements for registered investment advisors. Since the last filing of this brochure on October 30, 2018 the following has been updated:

- Item 4 has been updated to reflect the current amount of assets under management.
-

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Form ADV – Part 2A – Firm Brochure

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Item 4: Advisory Business

Firm Description

Hahn Financial Group, Inc., ("HFG") was founded in 2006 and became a registered investment advisor in 2014. Kelly Hahn is a 50% owner and Verlyn Hahn is 50% owner.

HFG provides investment management to individuals, pension and profit sharing plans, trusts, estates, and charitable organizations. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, insurance review, investment management, education funding, retirement planning, and estate planning.

HFG is a fee based investment management firm. The firm also sells insurance products for a commission.

HFG does not act as a custodian of client assets

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. For example, tax preparation and to the extent your estate plan needs to be updated, the tax preparer and/or attorney will bill the client separately. Conflicts of interest will be disclosed to the client in the event they should occur.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

Wrap Fee Programs

HFG does not sponsor any wrap fee programs.

Types of Advisory Services

ASSET MANAGEMENT

HFG offers discretionary direct asset management services to advisory clients. HFG will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize HFG discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Endowments

HFG offers discretionary direct asset management services to endowment clients as follows:

- Endowment/Investment Committee Education: Educational presentations for the committee will be informational in nature and intended to provide an overview of the IPS and the Endowment's investment selections that would align with their IPS.
- Develop Investment Policy Statement (IPS): The Committee's goals and objectives will be obtained to help determine the appropriate IPS and investment selections.
- Annual Review: Advisor will facilitate an annual review with the Endowment/Investment Committee covering the IPS/Investments to ensure alignment with the Committee's current goals and objectives.
- Quarterly Reports: quarterly paper statements will be provided to the contact person for the Endowment Committee.

SELECTION OF OTHER ADVISORS

When deemed appropriate for the client, HFG will select other advisors for the management of some or all of a client's account. These other advisors may charge fees in addition to the fees charged by HFG or may be paid a portion of the fee charged by HFG. The details on fees will be disclosed in Item 5 of this brochure.

Wealth Management, LLC

HFG when deemed appropriate for the client will utilize Wealth Management, LLC ("Sub-Advisor") to perform discretionary investment management services for certain client's using Sub-Advisor's Asset Allocation Models. Sub-Advisor shall have discretionary authority for the investment and reinvestment of the designated assets with full authority to buy, sell or otherwise effect investment transactions involving the designated assets in the client's name and for the client's account. The authority granted to Sub-Advisor will continue in force until revoked by HFG or client in writing, with such revocation effective upon Sub-Advisor receipt.

HFG is the primary investment advisor to the Clients and shall obtain from clients information to determine Client's financial situation and investment objectives and forward such information to Sub-Advisor in the form reasonably requested by Sub-Advisor prior to Sub-Advisor's obligation to provide services to client.

QUALIFIED PLANS

HFG will provide qualified plans with the following services:

- Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Investment options, retention, removal, addition of investment options and all other investment review duties will be assigned to an unaffiliated asset manager.
- Assist the Client in the reviewing and understanding of the investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan, provided by the asset manager. Client shall have the ultimate responsibility to ensure the asset manager continues to follow the IPS and provides the appropriate reports and investment reviews demonstrating that the policies and objectives outlined in the IPS are being followed.
- Educate the Plan Sponsor with respect to the asset manager's selection of a qualified default investment alternative for participants who are automatically enrolled in the

Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants.

- Assist the Plan Sponsor in monitoring investment options by reviewing the periodic asset manager's investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS, along with the asset manager's recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations provided by the asset manager.
- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. HFG will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan under this agreement. Any specific recommendations to participants will be under a separate agreement between the participant and HFG.
- Assist in the participant enrollments as needed, in order to increase retirement plan participation among the employees and investment and financial understanding by the employees.
- Meet with the asset manager periodically to understand their policies, procedures, objectives, processing and assist the Plan Sponsor in understanding those policies, procedures, etc. HFG may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between HFG and Client.

HFG has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

1. Employer securities;
2. Real estate (except for real estate funds or publicly traded REITs);
3. Stock brokerage accounts or mutual fund windows;
4. Participant loans;
5. Non-publicly traded partnership interests;
6. Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
7. Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to HFG under this Agreement.

ERISA PLAN SERVICES

HFG provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit sharing plans, cash balance plans, and deferred compensation plans. HFG may act as a 3(21).

Limited Scope ERISA 3(21) Fiduciary. HFG may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions on a non-discretionary basis. As an investment advisor HFG has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the

decisions made in their plan, though using HFG can help the plan sponsor mitigate liability by following a diligent process.

Fiduciary Services are:

- Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Investment options, retention, removal, addition of investment options and all other investment review duties will be assigned to a 3(38) Fiduciary.
- Assist the Client in the reviewing and understanding of the investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan, provided by the 3(38) Fiduciary. Client shall have the ultimate responsibility to ensure the 3(38) Fiduciary continues to follow the IPS and provides the appropriate reports and investment reviews showing that the policies and objectives outlined in the IPS are being followed.
- Educate the Plan Sponsor with respect to the 3(38) Fiduciary's selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
- Assist the Plan Sponsor in monitoring investment options by reviewing the periodic 3(38) Fiduciary's investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS, along with the 3(38) Fiduciary's recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations provided by the 3(38) Fiduciary.

Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands HFG's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, HFG is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. Advisor will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan under this agreement. Any specific recommendations to participants will be under a separate agreement between the participant and HFG.
- Assist participant enrollments as needed, in order to increase retirement plan participation among the employees and investment and financial understanding by the employees.
- Meet with the 3(38) Fiduciary periodically to understand their policies, procedures, objectives, processing and assist the Plan Sponsor in understanding those policies, procedures, etc.

HFG may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Advisor and Client.

HFG has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to HFG on the ERISA Agreement.

Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

NEWSLETTERS AND PERIODICALS

HFG provides newsletters and periodicals to clients. There is no charge to the client for this service.

Client Assets under Management

As of December, 31, 2018 HFG had \$40,199,000 client assets under management on a discretionary basis and advised on \$215,928,190 as a pension consultant.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

HFG offers discretionary direct asset management services to advisory clients. HFG charges an annual investment advisory fee based on the total assets under management

as follows:

The fees payable to HFG	
Assets Under Management	Annual Fee
\$0 to \$49,999	1.75%
\$50,000 to \$199,999	1.50%
\$200,000 to \$499,999	1.25%
\$500,000 to \$999,999	1.00%
\$1,000,000 to \$1,999,999	.90%
\$2,000,000 to \$2,999,999	.80%
\$3,000,000 to \$3,999,999	.70%
\$4,000,000 to \$4,999,999	.60%
\$5,000,000 or more	.50%

The annual Fee may be negotiable based on the amount of assets, the investments to be utilized and the complexity of the account. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in advance based on the amount of assets managed as of the last business day of the previous quarter. Initial fees for partial quarters are waived. Quarterly advisory fees are deducted from the clients' account by the custodian. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with seven (7) days written notice.

Upon participant termination, management fees will be pro-rated to the effective date of termination. Participant will receive a refund of management fees paid but not yet earned through the effective date of termination except for management fees totaling less than or equal to \$50 per Client. The \$50 is considered as the administrative costs to process the termination. "The date of termination" is defined as the date of total withdrawal or total transfer from the account. If unearned management fees total more than \$50 per Client upon termination, they will be refunded in total to the Participant.

(Pro rata is calculated by multiplying the Annual Fee by the Account Value divided by the number of days left in the quarter divided by 360 days. For example if the Account value was \$200,000 and the account was closes with 15 days left in the quarter the calculation would be $(1\% \times 200,000) \times (15/360) = \84.00 .) Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

ENDOWMENTS

HFG charges an annual investment advisory fee based on the total assets under management as follows:

The fees payable to HFG	
Assets Under Management	Annual Fee
\$50,000 to \$2,000,000	0.50%
\$2,000,001 to \$5,000,000	0.42%
\$5,000,001 or more	0.35%

The annual Fee may be negotiable based on the amount of assets, the investments to be utilized and the complexity of the account. Accounts within the same organization may be combined for a reduced fee. Fees are billed quarterly in advance based on the amount of assets managed as of the last business day of the previous quarter. Initial fees for partial quarters are waived. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in a provided fee invoice, as part of the quarterly statement, as fees are withdrawn. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with seven (7) days written notice.

Upon participant termination, management fees will be pro-rated to the effective date of termination. Participant will receive a refund of management fees paid but not yet earned through the effective date of termination except for management fees totaling less than or equal to \$50 per Client. The \$50 is considered as the administrative costs to process the termination. "The date of termination" is defined as the date of total withdrawal or total

transfer from the account. If unearned management fees total more than \$50 per Client upon termination, they will be refunded in total to the Participant.

(Pro rata is calculated by multiplying the Annual Fee by the Account Value divided by the number of days left in the quarter divided by 360 days. For example if the Account value was \$200,000 and the account was closed with 15 days left in the quarter the calculation would be $(.5\% \times 200,000) \times (15/360) = \41.67 .) Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

FEES ASSOCIATED WITH THE SELECTION OF OTHER ADVISORS

The fees payable to the Adviser are as follow below.

Wealth Management, LLC

Wealth Management, LLC ("Sub-Advisor") does not charge fees in addition to the fees charged by HFG, they will receive 20% of the fees charged by HFG detailed above in the fee schedule titled "The fees payable to HFG". The client will pay no additional fees when this sub-manager is used.

QUALIFIED PLANS

The annual fee for services shall be calculated as follows:

The fees payable to HFG	
Assets Under Management	Annual Fee
\$0 to \$9,999,999	.50%
\$10,000,000 to \$99,999,999	.45%
\$100,000,000 to \$149,999,999	.40%
\$150,000,000 to \$199,999,999	.35%
\$200,000,000 to \$249,999,999	.30%
\$250,000,000 or more	.25%

The annual fee is negotiable. Fees are charged, as noted above, based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets) on the last business day of the previous quarter. Initial fees for partial quarters are waived. If this Agreement is terminated prior to the end of the fee period, HFG shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the fee period.

The fee schedule, which includes compensation of HFG for the services is described in detail in Schedule A of the Qualified Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. HFG does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, HFG will disclose this compensation, the services

rendered, and the payer of compensation. HFG will offset the compensation against the fees agreed upon under this Agreement.

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets as follows:

The fees payable to HFG	
Assets Under Management	Annual Fee
\$0 to \$9,999,999	.50%
\$10,000,000 to \$99,999,999	.45%
\$100,000,000 to \$149,999,999	.40%
\$150,000,000 to \$199,999,999	.35%
\$200,000,000 to \$249,999,999	.30%
\$250,000,000 or more	.25%

The annual fee is negotiable. Fees are charged, as noted above, based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets) on the last business day of the previous quarter. Initial fees for partial quarters are waived. If this Agreement is terminated prior to the end of the fee period, HFG shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the fee period.

The fee schedule, which includes compensation of HFG for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. HFG does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, HFG will disclose this compensation, the services rendered, and the payer of compensation. HFG will offset the compensation against the fees agreed upon under this Agreement.

Client Payment of Fees

Investment management fees are billed quarterly in advance, meaning we bill you before the three-month period has started. 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.

Additional Client Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). These transaction charges are usually small and incidental to the purchase or sale of a security. The

selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. HFG does not receive any portion of these fees.

For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

HFG does not require prepayment of fees of more than \$500 per client and six months or more in advance.

External Compensation for the Sale of Securities to Clients

HFG does not receive any external compensation for the sale of securities to clients.

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

Sharing of Capital Gains

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

HFG does not use a performance-based fee structure because of the 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.

Item 7: Types of Clients

Description

HFG generally provides investment advice to individuals, trusts, estates, charitable organizations, and pension plans.

Client relationships vary in scope and length of service.

Account Minimums

HFG does not require a minimum to open an account but some money managers may require a minimum.

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

Methods of Analysis

Security analysis methods may include charting, fundamental, technical, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Charting analysis involves the use of patterns in performance charts. HFG uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement, Risk Tolerance or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with HFG:

- *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 buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas 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.

Item 9: Disciplinary Information

Criminal or Civil Actions

The firm and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

The firm and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

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

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

HFG is not registered as a broker dealer, and its employees are not registered representatives of an unaffiliated broker-dealer.

Futures or Commodity Registration

Neither HFG nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Co-Owners Kelly Hahn and Verlyn Hahn are also licensed insurance agents through Hahn Financial Group, Inc. Approximately 5% of Kelly's time and approximately 30% of Verlyn's time is spent in this practice. From time to time, they will offer clients services from those activities.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

HFG may at times utilize the services of another investment advisor, Wealth Management, to manage client accounts. This situation may create a conflict of interest as the fees retained by HFG may be higher with some advisors. However, when referring clients to another investment advisors, the client's best interest will be the main determining factor of HFG. These fees do not include brokerage fees that may be assessed by the custodial

broker dealer. Fees for these services will be based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency are detailed in Item 5 of this brochure.

This relationship will be disclosed to the client in each contract between HFG and the other investment advisor. Client will initial HFG's Investment Advisory Agreement to acknowledge receipt of Third Party fee Schedule and required documents including Form ADV Part 2 disclosures.

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

Code of Ethics Description

The employees of HFG have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of HFG employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of HFG. The Code reflects HFG and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

HFG's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of HFG may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

HFG's Code is based on the guiding principle that the interests of the client are our top priority. HFG's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

HFG and its employees do not recommend to clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

HFG and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide HFG with copies of their brokerage statements.

The Chief Compliance Officer of HFG is Kelly Hahn. She reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

HFG does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide HFG with copies of their brokerage statements.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

HFG may recommend the use of a particular broker-dealer, such as TD Ameritrade Institutional, a Division of TD Ameritrade, Inc., Member FINRA/SIPC or may utilize a broker-dealer of the client's choosing. HFG will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. HFG relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by HFG.

HFG participates in the TD Ameritrade Institutional program. TD Ameritrade, Inc. ("TD Ameritrade") is an independent SEC-registered broker-dealer and is not affiliated with COMPASS. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14)

- *Directed Brokerage*

In circumstances where a client directs HFG to use a certain broker-dealer, HFG still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: HFG's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a

broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by HFG from or through a broker-dealer in exchange for directing client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, HFG receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of HFG. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when HFG receives soft dollars. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to act in the best interest of its clients and the services received are beneficial to all clients.

Aggregating Securities Transactions for Client Accounts

HFG is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of HFG. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by IARs of HFG. Account reviews are performed more frequently when market conditions dictate.

Review of Client Accounts on Non-Periodic Basis

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

Content of Client Provided Reports and Frequency

Clients receive account statements no less than quarterly for managed accounts. Account statements are issued by the Asset Manager's custodian. Clients are urged to review the account statements received directly from their custodians. Client receives confirmations of each transaction in their account from the custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

As disclosed under Item 12 above, HFG participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between HFG's participation in the program and the investment advice it gives to its Clients, although HFG receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving HFG participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to HFG by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by HFG's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit HFG but may not benefit its Client accounts. These products or services may assist HFG in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by the custodian are intended to help HFG manage and further develop its business enterprise. The benefits received by HFG or its personnel through participation in the program do not depend on the amount of brokerage transactions. As part of its fiduciary duties to clients, HFG endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by HFG or its related persons in and of itself creates a conflict of interest and may indirectly influence the HFG's choice custodian for custody and brokerage services.

Advisory Firm Payments for Client Referrals

HFG does not compensate for client referrals.

Item 15: Custody

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.

HFG is deemed to have constructive custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of HFG.

Item 16: Investment Discretion

Discretionary Authority for Trading

HFG accepts discretionary authority to manage securities accounts on behalf of clients. HFG has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The

client will authorize HFG discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

The client approves the custodian to be used and the commission rates paid to the custodian. HFG does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Item 17: Voting Client Securities

Proxy Votes

HFG does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, HFG will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because HFG does not serve as a custodian for client funds or securities and HFG does not require prepayment of fees of more than \$500 per client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

HFG has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

Bankruptcy Petitions during the Past Ten Years

Neither HFG nor its management has had any bankruptcy petitions in the last ten years.

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Kelly Ann Hahn, ChFC®



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Hahn Financial Building

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KellyHahn@HahnFinancialGroup.com

This brochure supplement provides information about Kelly Ann Hahn and supplements the Hahn Financial Group, Inc.'s brochure. You should have received a copy of that brochure. Please contact Hahn Financial Group, Inc. if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Kelly Ann Hahn (CRD #4632939) is available on the SEC's website at www.adviserinfo.sec.gov.

JANUARY 30, 2019

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer

Kelly Ann Hahn, ChFC®

- Year of birth: 1960
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Educational Background and Business Experience

Educational Background:

- Iowa Methodist Medical Center Nursing School; RN Degree; 5/1981

Professional Certifications:

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

Chartered Financial Consultant® (ChFC®): Chartered Financial Consultant (ChFC®) is a designation issued by the American College. ChFC® designation requirements:

- Complete ChFC® coursework within five years from the date of initial enrollment.
- Pass the exams for all required elective courses. A minimum score of 70% must be achieved to pass.
- Meet the experience requirements: Three years of full-time business experience within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your ChFC® designation, you must earn 30 hours of continuing education credit every two years.

Business Experience:

- Hahn Financial Group, Inc.; Co-Owner/Investment Advisor Representative; 01/2014-Present
 - Hahn Financial Group, Inc.; Co-Owner/Insurance Agent; 10/2006-Present
 - Hahn Holding I, LLC; Managing Member; 11/2006-Present
 - Hahn Holding II, LLC; Managing Member; 11/2006-Present
 - Gradient Securities, LLC; Registered Representative; 1/2014-12/2014
 - American United Life; Agent; 11/2006-01/2014
 - OneAmerica Securities; Investment Advisor Representative; 11/2006-1/2014
 - OneAmerica Securities; Registered Representative; 11/2006-12/2013
 - Thrivent Investment Management Inc.; Investment Advisor Representative; 02/2003-10/2006
 - Thrivent Financial for Lutherans; Partner, Great Plains Region; 07/2002-10/2006
-

Other Business Activities Engaged In

Kelly Hahn has a financial industry affiliated business as an insurance agent. Approximately 5% of her time is spent in this business. From time to time, she offers

clients advice or products from those activities. Clients are not required to purchase any products.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the interests of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

In addition, Ms. Hahn is on the scholarship committee for WELS Kingdom Workers. This will not represent a conflict of interest because this scholarship is designed for very low income foreign applicants who volunteer with WELS Kingdom Workers.

Additional Compensation

Mrs. Hahn receives no additional compensation other than her salary from Hahn Financial Group. She does not receive any performance based fees.

Disciplinary Actions

None to report.

Supervision

Kelly Hahn is the co-owner and Chief Compliance Officer of Hahn Financial Group, Inc. she is responsible for formulation and monitoring of investment advice offered to clients and all supervision. She will adhere to the policies and procedures as described in the firm's Compliance Manual.

SUPERVISED PERSON BROCHURE

FORM ADV PART 2B

Verlyn Earl Hahn
CFP[®] ChFC[®], CLU[®]



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This brochure supplement provides information about Verlyn Earl Hahn and supplements the Hahn Financial Group, Inc.'s brochure. You should have received a copy of that brochure. Please contact Hahn Financial Group, Inc. if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Verlyn Earl Hahn (CRD #1590372) is available on the SEC's website at www.adviserinfo.sec.gov.

JANUARY 30, 2019

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer

Verlyn Earl Hahn, CFP® ChFC® CLU®

- Year of birth: 1960
-

Educational Background and Business Experience

Educational Background:

- CFP Designation; 2006
- ChFC Designation; 2006
- CLU Designation; 2005
- LUTCF; 1988

Professional Certifications

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

Certified Financial Planner (CFP®): Certified Financial Planner is a designation granted by the CFP® Board. CFP® requirements:

- Completion of the financial planning education requirements set by the CFP® Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.
- When you achieve your CFP® designation, you must renew your certification every two years, pay an annual certification fee and complete 30 hours of continuing education every two years.

Chartered Financial Consultant® (ChFC®): Chartered Financial Consultant (ChFC®) is a designation issued by the American College. ChFC® designation requirements:

- Complete ChFC® coursework within five years from the date of initial enrollment.
- Pass the exams for all required elective courses. A minimum score of 70% must be achieved to pass.
- Meet the experience requirements: Three years of full-time business experience within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience.
- Take the Professional Ethics Pledge.
- When you achieve your ChFC® designation, you must earn 30 hours of continuing education credit every two years.

Chartered Life Underwriter (CLU®): Chartered Life Underwriter is a designation granted by the American College. CLU® designation requirements:

- Successfully complete CLU® coursework: five required and three elective courses.

- Meet the experience requirements: Three years of business experience immediately preceding the date of the use of the designation are required. An undergraduate or graduate degree from an accredited education institution qualifies as one year of business experience. (Mr. Hahn was grandfathered for this requirement as he received his certification prior to this requirement)
- Take the Professional Ethics Pledge.
- When you achieve the CLU® designation, you must complete 30 hours of continuing education credit every two years.

Business Experience:

- Hahn Financial Group, Inc.; Co-Owner/Investment Advisor Representative; 01/2014-Present
- Hahn Financial Group, Inc.; Co-Owner/Insurance Agent; 10/2006-Present
- Employer Referral Group, LLC; Managing Member; 02/2013-Present
- Gradient Securities, LLC; Registered Representative; 01/2014-12/2014
- American United Life; Insurance Agent; 11/2006-01/2014
- OneAmerica Securities; Investment Advisor Representative; 11/2006-1/2014
- OneAmerica Securities; Registered Representative; 11/2006-12/2013
- Thrivent Financial Bank; Solicitor; 07/2002-10/2006
- Thrivent Investment Management Inc.; Managing Partner; 07/2002-10/2006
- Thrivent Financial for Lutherans; Insurance Agent; 07/2002-10/2006

Other Business Activities Engaged In

Verlyn Hahn has a financial industry affiliated business as an insurance agent. Approximately 30% of his time is spent in this business. From time to time, he offers clients advice or products from those activities. Clients are not required to purchase any products.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the interests of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Additional Compensation

Mr. Hahn receives no additional compensation other than her salary from Hahn Financial Group. He does not receive any performance based fees.

Disciplinary Actions

None to report.

Supervision

Verlyn Hahn is supervised by Kelly Hahn, but as the co-owner of Hahn Financial Group, Inc. he is responsible for formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.