



**HFG Advisors, Inc.
d/b/a Hackman Financial Group**

Form ADV Part 2A – Disclosure Brochure

Effective: February 15, 2018

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of HFG Advisors, Inc. d/b/a Hackman Financial Group ("Hackman Financial Group" or the "Advisor"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (513) 891-5300.

Hackman Financial Group is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Hackman Financial Group to assist you in determining whether to retain the Advisor.

Additional information about Hackman Financial Group and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 282027.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Hackman Financial Group. For convenience, we have combined these documents into a single disclose document.

Hackman Financial Group believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Hackman Financial Group encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has updated its disclosures relating to engaging paid solicitors for client referrals. Please see Item 14.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Hackman Financial Group.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 282027. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (513) 891-5300.

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Item 4 – Advisory Services

A. Firm Information

HFG Advisors, Inc. d/b/a Hackman Financial Group (“Hackman Financial Group” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a Corporation under the laws of Ohio. Hackman Financial Group was founded in July 2016 and is owned and operated by James F. Hackman (Founder and President). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Hackman Financial Group.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

B. Advisory Services Offered

Hackman Financial Group offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and retirement plans in the State of Ohio and other states (each referred to as a “Client”).

Investment Management Services

Hackman Financial Group provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Hackman Financial Group works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Hackman Financial Group will then construct a portfolio, consisting of diversified mutual funds, exchange-traded funds (“ETFs”), equity securities, fixed income securities, and real estate investment trusts (“REITs”). The Advisor may also utilize other types of investments to meet the needs of certain Clients.

Hackman Financial Group’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Hackman Financial Group will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Hackman Financial Group evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Hackman Financial Group may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Hackman Financial Group may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Hackman Financial Group may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Hackman Financial Group accept or maintain custody of a Client’s funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. Please see Item 12 – Brokerage Practices.

Use of Independent Managers

Hackman Financial Group may recommend to Clients that all or a portion of their investment portfolio be implemented by utilizing one or more unaffiliated money managers or investment platforms (collectively “Independent Managers”). The Client will be required to enter into a separate agreement with the Independent Manager[s]. Hackman Financial Group serves as the Client’s primary advisor and relationship manager.

However, the Independent Manager[s] will assume discretionary authority for the day-to-day investment management of those assets placed in their control. Hackman Financial Group will assist and advise the Client in establishing investment objectives for their account[s], the selection of the Independent Manager[s], and defining any restrictions on the account[s]. Hackman Financial Group will continue to provide oversight of the Client's account[s] and ongoing monitoring of the activities of these unaffiliated parties.

The Independent Manager[s] will implement the selected investment strategies based on their investment mandates. The Client may be able to impose reasonable investment restrictions on these accounts, subject to the acceptance of these third parties.

As the Advisor has an affiliation with LPL Financial, the Advisor may recommend investment programs offered by LPL Financial. Please see Item 5.E. and Item 10.

The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Form ADV Part 2A (or a brochure that makes the appropriate disclosures) of those parties. Hackman Financial Group does not receive any compensation from these Independent Managers or Investment Platforms, other than Hackman Financial Group's investment advisory fee (described in Item 5).

Financial Planning Services

Hackman Financial Group will typically provide a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

As part of our financial planning services, Hackman Financial Group may provide personal financial planning tailored to the individual needs of each Client. A particular Client's financial plan will include the relevant types of planning specific to their needs and objectives such as:

- *Retirement* – planning an investment strategy with the objective of providing inflation-adjusted income for life.
- *College / Education* – planning to pay the future college / education expenses of a child or grandchild.
- *Major Purchase* – Evaluation of the pros and cons of home ownership versus renting as well as buying or leasing a car, for example.
- *Divorce* – planning for the financial impact of divorce such as change in income, retirement benefits and tax considerations.
- *Insurance Needs* – planning for the financial needs of survivors to satisfy such financial obligations as housing, dependent child care and spousal arrangements as well as education.
- *Final Expenses* – planning to leave assets to cover final expenses such as funeral, debts and potential business continuity.
- *Estate Planning* – planning that focuses on the most efficient and tax friendly option to pass on an estate to a spouse, other family members or a charity.
- *Cash Flow/ Budget Planning* – planning to manage expenses against current and projected income.
- *Wealth Accumulation* – planning to build wealth within a portfolio that takes into consideration risk tolerance and time horizon.
- *Business Succession* – planning for the continuation of a business in a smooth a transition as possible with the use of buy-sell agreements, key-man insurance and engaging independent legal counsel as needed.
- *Tax Planning* – planning a tax efficient investment portfolio to maximize deductions and off-setting losses.
- *Investment Planning* – planning an investment strategy consistent with particular objectives, time horizons and risk tolerances.

The services take into account information collected from the Client such as financial status, investment objectives and tax status, among other data. Fees for such services are negotiable and detailed in the Client agreement.

The financial plan may include generic recommendations as to general types of investment products or specific securities which may be appropriate for the Client to purchase given his/her financial situation and objectives. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Hackman Financial Group may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor or additional compensation to its Advisory Person[s]. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor. If the Client desires to purchase securities or advisory services in order to implement his/her financial plan, the Advisor may implement these recommendations internally or suggest that the Client engage its Advisory Persons in their separate capacity as registered representatives of LPL Financial LLC ("LPL Financial"). Please see Item 5.E. and Item 10.

Retirement Plan Advisory Services

Hackman Financial Group may assist Clients that are trustees or other fiduciaries (each a "Plan Sponsor") of retirement plans (each a "Plan") by providing fee-based consulting and/or advisory services. Hackman Financial Group may perform one or more of the following services, pursuant to the terms of the retirement plan advisory agreement:

- Assistance in the preparation or review of an investment policy statement ("IPS") for the Plan based upon consultation with Plan Sponsor to ascertain Plan's investment objectives and constraints.
- Acting as a liaison between the Plan and service providers, product sponsors or vendors.
- Ongoing monitoring of investment manager(s) or investments in relation to the criteria specified in the Plan's IPS or other written guidelines provided by the Plan Sponsor.
- Preparation of reports describing the performance of Plan investment manager(s) or investments, as well as comparing the performance to benchmarks.
- Ongoing recommendations, for consideration and selection by Plan Sponsor, about specific investments to be held by the Plan or, in the case of a participant-directed defined contribution plan, to be made available as investment options under the Plan.
- Education or training for the members of the Plan investment committee with regard to various matters, including plan features, retirement readiness matters, service on the committee, and fiduciary responsibilities.
- Assistance in enrolling Plan Participants, including conducting an agreed upon number of enrollment meetings. As part of such meetings, the Advisor may provide Plan Participants with information about the Plan, which may include information on the benefits of Plan participation, the benefits of increasing Plan contributions, the impact of pre-retirement withdrawals on retirement income, the terms of the Plan and the operation of the Plan.

If the Plan makes available publicly traded employer stock ("company stock") as an investment option under the Plan, the Advisor does not provide investment advice regarding company stock and are not responsible for the decision to offer company stock as an investment option. In addition, if Plan Participants invest the assets in their accounts through individual brokerage accounts, a mutual fund window, or other similar arrangement, or may obtain participant loans, the Advisor does not provide any individualized advice or recommendations to the Plan Participants regarding these decisions. Furthermore the Advisor does not provide individualized investment advice to Plan Participants regarding their Plan assets.

C. Client Account Management

Prior to engaging Hackman Financial Group to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Hackman Financial Group, in connection with the Client, will develop a strategy that seeks to achieve the investment goals and objectives of the Client.
- Asset Allocation – Hackman Financial Group will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – Hackman Financial Group will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Hackman Financial Group will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

HFG may include the securities transaction fees together with investment advisory fees to provide the Client with a single, bundled fee structure. This combination of fees is typically referred to as a "Wrap Fee Program". HFG customizes its investment management services for Clients. This Wrap Fee Program Brochure is included as Appendix 1 to this Disclosure Brochure solely to discuss the fees and potential conflicts associated with a bundled fee. Please see Appendix 1, which is always included with this Disclosure Brochure.

E. Assets Under Management

As of December 31, 2017, Hackman Financial Group manages approximately \$115,000,000 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior quarter. Investment advisory fees range from 0.80% to 1.50% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fee will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Hackman Financial Group will be independently valued by the Custodian (as discussed in Item 12). Hackman Financial Group will not have the authority or responsibility to value portfolio securities.

Clients may make additions to and withdrawals from their account[s] at any time, subject to Hackman Financial Group's right to terminate an account. Additions may be in cash or securities provided that Hackman Financial Group reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client's account[s]. Clients may withdraw account assets on notice to Hackman Financial Group, subject to the usual and customary securities settlement procedures. However, Hackman Financial Group designs its portfolios

as long-term investments and the withdrawal of assets may impair the achievement of a Client's investment objectives. Hackman Financial Group may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Use of Independent Managers

For Client account[s] implemented through an Independent Manager, the Client's overall fees will include both the Advisor's investment advisory fee (as noted above) plus advisory fees and/or platform fees charged by the Independent Manager[s], as applicable. The Independent Manager may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s]. In such instances, Hackman Financial Group will not charge its fee separately on those assets. Hackman Financial Group does not receive any portion of the Independent Manager's fees. Hackman Financial Group will only earn its advisory fees as noted above.

Financial Planning Services

Hackman Financial Group offers financial planning services either on an hourly basis or for a fixed fee per engagement. Hourly engagements are billed at a rate of up to \$250 per hour. Fixed fee engagements are based on expected number of hours to complete the engagement deliverable[s] at the negotiated hourly rate, but typically range up to \$5,000. Certain complex situations may be offered at a fee that exceeds \$5,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.50%. Fees may be negotiable depending on the size and complexity of the Plan.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Custodian and deducted from the Client's account[s]. The Client shall instruct the Custodian to automatically deduct the investment advisory fee from the Client's account[s] for each billing period and pay the investment advisory fee[s] to the Advisor. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Hackman Financial Group at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Hackman Financial Group to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers

Client account[s] implemented through Independent Manager[s] will be billed in accordance to the separate agreement[s] with the respective parties. The Independent Managers will often bill you directly. However, in some instances, the Independent Managers will add Hackman Financial Group's investment advisory fee and deduct the overall fee from the Client's account[s].

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Hackman Financial Group includes securities transactions costs, if applicable, as part of its overall investment advisory fee through the Hackman Financial Group Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to Hackman Financial Group for investment advisory services or part of the Hackman Financial Group Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Hackman Financial Group, but would not receive the services provided by Hackman Financial Group which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Hackman Financial Group to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management and Retirement Plan Advisory Services

Hackman Financial Group is compensated for its services in advance of the quarter in which advisory services are rendered. Either party may terminate the advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the quarter. The Client's agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that a Client should wish to terminate their relationship with an Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and those third parties. Hackman Financial Group will assist the Client with the termination and transition as appropriate.

Financial Planning Services

Hackman Financial Group requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engage, the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Advisory Persons of Hackman Financial Group are also registered representatives of LPL Financial LLC, a registered broker-dealer (CRD# 6413), member FINRA, SIPC (herein "LPL Financial"). Clients may implement securities transactions through our Advisory Persons in one's individual capacity as a registered representative of LPL Financial. Prior to effecting any transactions Clients are required to enter into a new account agreement with LPL Financial. The brokerage commissions charged by LPL Financial may be higher or lower than those charged by other broker-dealers. Hackman Financial Group does not charge an ongoing investment advisory fee on the same assets for which an Advisory Person also receives commissions.

Advisory Persons are also licensed as independent insurance professionals under our affiliated entity Hackman Financial Group, Inc. Advisory Persons will earn commission-based compensation for selling insurance products. Insurance commissions earned by Advisory Persons are separate and in addition to advisory fees paid to Hackman Financial Group. This practice presents a conflict of interest, as there may be an incentive to recommend insurance products for the purpose of generating commissions rather than solely based on a Client's needs. Clients are under no obligation, contractually or otherwise, to purchase insurance products through our Advisor Persons. Please see Item 10 for additional information.

Item 6 – Performance-Based Fees and Side-By-Side Management

Hackman Financial Group does not charge performance-based fees for its investment advisory services. The fees charged by Hackman Financial Group are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Hackman Financial Group does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Hackman Financial Group offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and retirement plans. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Hackman Financial Group generally does not impose a minimum size for establishing a relationship, but certain investments or strategies may require a minimum account size.

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

A. Methods of Analysis

Hackman Financial Group employs fundamental, technical and charting analysis methods in developing investment strategies for its Clients. Research and analysis from Hackman Financial Group is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Hackman Financial Group will be able to accurately predict such a reoccurrence.

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose

value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

As noted above, Hackman Financial Group generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Hackman Financial Group will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Hackman Financial Group may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Hackman Financial Group will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategies:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Hackman Financial Group or any of its Supervised Persons. Hackman Financial Group values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 282027.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Advisory Persons are also registered representatives of LPL Financial. In one's separate capacity as a registered representative, an Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by our Advisory Persons. Neither the Advisor nor our Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in one's separate capacity as a registered representative.

Insurance Agency Affiliations

Advisory Persons are also licensed insurance professionals conducting business under our affiliated entity Hackman Financial Group, Inc. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with Hackman Financial Group. As an insurance professional, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Our Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or its Advisory Persons.

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

A. Code of Ethics

Hackman Financial Group has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Hackman Financial Group (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Hackman Financial Group and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Hackman Financial Group' Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (513) 891-5300.

B. Personal Trading with Material Interest

Hackman Financial Group allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Hackman Financial Group does not act as principal in any

transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Hackman Financial Group does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Hackman Financial Group allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Hackman Financial Group requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Hackman Financial Group allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will Hackman Financial Group, or any Supervised Person of Hackman Financial Group, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Hackman Financial Group does not have discretionary authority to select the broker-dealer/custodian (herein the "Custodian") for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Capstone to direct trades to the Custodian as agreed in the investment advisory agreement. Further, Hackman Financial Group does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis. As its Advisory Persons are also registered representatives of LPL Financial, Hackman Financial Group and its Advisory Persons are limited in the custodian[s] in which they can recommend to Clients. Typically, Hackman Financial Group will recommend that Clients select LPL Financial as the Custodian, where Hackman Financial Group has access to LPL Financial's systems, back office support, research and other benefits. While Hackman Financial Group receives these economic benefits from LPL Financial, we believe LPL Financial provides quality execution and related services for our Clients at competitive prices. Price is not the sole factor Hackman Financial Group considers in evaluating best execution and the recommendation of a custodian. Hackman Financial Group also considers the quality of the brokerage services provided by LPL Financial, including the firm's reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm. Clients are free to use whatever broker-dealer/custodian they choose to implement financial planning recommendations. For investment advisory services, Hackman Financial Group would be required to obtain permission to use a broker-dealer or custodian other than LPL Financial due to the oversight role LPL Financial assumes over the Advisory Persons. Please see Item 14.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealers/custodians in exchange for research and other services. **Hackman Financial Group does not participate in soft dollar programs sponsored or offered by any broker-dealer. However, the Advisor does receive certain economic benefits from LPL Financial as detailed in Item 14 below.**

2. Brokerage Referrals - Hackman Financial Group does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a “directed brokerage basis”, where Hackman Financial Group will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). Hackman Financial Group will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Hackman Financial Group will execute its transactions through a Custodian selected by the Client. Hackman Financial Group may aggregate orders in a block trade or trades when securities are purchased or sold through the same Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

As discussed previously, Advisory Persons of Hackman Financial Group are also registered representatives of LPL Financial. LPL Financial has regulatory obligations in overseeing certain activities of these persons, and as a result, may have access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about Hackman Financial Group Clients, even if Client does not establish any account through LPL Financial. If you would like a copy of the LPL Financial Privacy Policy, please contact Michael Hackman at (513) 891-5300 or via email at mhackman@hackmanfinancial.com.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by the Chief Compliance Officer. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account. The Client is encouraged to notify Hackman Financial Group if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Hackman Financial Group

Participation in Institutional Advisor Platform

Hackman Financial Group has established institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship

with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from LPL Financial: financial start-up support; reimbursement to Clients for transfer costs to the platform/custodian; receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Use of Independent Managers

The Advisor may be indirectly compensated by an Independent Manager as described in Item 5 above and does not receive any other forms of compensation with such arrangements.

B. Client Referrals from Solicitors

Hackman Financial Group may engage and compensate unaffiliated third party referral sources (a "solicitor") for Client referrals. Clients will not pay a higher fee to Hackman Financial Group as a result of such payments to a solicitor. The Advisor shall enter into an agreement with the solicitor, which requires that full disclosure of the compensation and other conflicts is provided to the prospective client prior to or at the time of entering into the advisory agreement.

Item 15 – Custody

Hackman Financial Group does not accept or maintain custody of any Client accounts. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Hackman Financial Group to utilize the Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Hackman Financial Group to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 – Investment Discretion

Hackman Financial Group generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Hackman Financial Group. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Hackman Financial Group will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Hackman Financial Group does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting. However, Independent Managers selected or recommended by the Advisor firm may vote proxies for Clients, pursuant to their separate agreement[s] and disclosure[s].

Item 18 – Financial Information

Neither Hackman Financial Group, nor its management, have any adverse financial situations that would reasonably impair the ability of Hackman Financial Group to meet all obligations to its Clients. Neither Hackman Financial Group, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Hackman Financial Group is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



HFG Advisors, Inc.

d/b/a Hackman Financial Group Inc.

**Form ADV Part 2A – Appendix 1
("Wrap Fee Brochure")**

Effective: February 15, 2018

This Form ADV 2A - Appendix 1 ("Wrap Fee Brochure") provides information about the qualifications and business practices for HFG Advisors, Inc. ("Hackman Financial Group" or the "Advisor") services when offering services pursuant to a wrap program. This Wrap Fee Brochure shall always be accompanied by the Hackman Financial Group Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete Hackman Financial Group Disclosure Brochure or you have any questions about the contents of this Wrap Fee Brochure or the Hackman Financial Group Disclosure Brochure, please contact us at (513) 891-5300.

Hackman Financial Group is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Wrap Fee Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Brochure provides information about Hackman Financial Group to assist you in determining whether to retain the Advisor.

Additional information about Hackman Financial Group and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 282027.

Item 2 – Material Changes

Form ADV 2 - Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Brochure discusses wrap fee programs offering by the Advisor.

Material Changes

The following material changes have been made to this Wrap Fee Brochure since the last filing and distribution to Clients:

- The Advisor has updated its disclosures relating to engaging paid solicitors for client referrals. Please see Item 9.

Future Changes

From time to time, we may amend this Wrap Fee Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Wrap Fee Brochure (along with the complete Hackman Financial Group Disclosure Brochure) or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Hackman Financial Group.

At any time, you may view this Wrap Fee Brochure and the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 282027. You may also request a copy of this full Disclosure Brochure at any time, by contacting us at (513) 891-5300.

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Item 4 – Services Fees and Compensation

A. Services

Hackman Financial Group provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the Hackman Financial Group Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting Hackman Financial Group as your investment advisor.

As part of the investment advisory fees noted in Item 5 of the Disclosure Brochure, Hackman Financial Group includes normal securities transaction fees as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees into the single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the Hackman Financial Group Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on HFG Advisor’s investment philosophy and related services.**

B. Program Costs

Advisory services provided by Hackman Financial Group are offered in a wrap fee structure whereby normal securities transaction costs are included in the overall investment advisory fee paid to Hackman Financial Group. As the level of trading in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity in the Client’s account[s]. A Wrap Fee structure has a potential conflict of interest as the Advisor may have an incentive to limit the number of trades placed in the Client’s account[s]. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees range from 0.80% to 1.50% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fee will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Hackman Financial Group will be independently valued by the Custodian (as discussed in Item 12). Hackman Financial Group will not have the authority or responsibility to value portfolio securities.

Clients may make additions to and withdrawals from their account[s] at any time, subject to Hackman Financial Group’s right to terminate an account. Additions may be in cash or securities provided that Hackman Financial Group reserves the right to liquidate any transferred securities or decline to accept particular securities into a Client’s account[s]. Clients may withdraw account assets on notice to Hackman Financial Group, subject to the usual and customary securities settlement procedures. However, Hackman Financial Group designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a Client’s investment objectives. Hackman Financial Group may consult with its Clients about the options and ramifications of transferring securities. However, Clients are advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

As noted above, the Wrap Fee Program includes normal securities trading costs incurred in connection with the discretionary investment management services provided by Hackman Financial Group. Securities transaction fees for Client-directed trades may be charged back to the Client.

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Under this Wrap Fee Program, Hackman Financial Group includes securities transactions costs as part of its overall investment advisory fee. Certain Clients may have investments in certain share classes which pay a 12b-1 fee to the Custodian therefore no securities transaction fees are assessed. These are referred to as NTF funds (no transaction fee funds). When NTF funds are used instead of an institutional share class, there are no transactions fees, but a higher underlying expense ratio.

All fees paid to Hackman Financial Group for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. The Client may also incur other costs assessed by the Custodian or other parties for account related activity fees, such as wire transfer fees, trade away fees and other fees. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by Hackman Financial Group to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

D. Compensation

Hackman Financial Group is the sponsor and portfolio manager of this Wrap Fee Program. Hackman Financial Group receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Custodian for the costs associated with the normal trading activity in the Client's account[s].

Item 5 – Account Requirements and Types of Clients

Hackman Financial Group offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and retirement plans. Hackman Financial Group generally does not impose a minimum account size for establishing a relationship. Please see Item 7 – Types of Clients in the Disclosure Brochure for additional information.

Item 6 – Portfolio Manager Selection and Evaluation

A. Portfolio Manager Selection

Hackman Financial Group serves as sponsor and as portfolio manager for the services under this Wrap Fee Program. Additionally, Hackman may place Client assets in LPL Financial's Wrap Fee Program where LPL Financial serves as the Sponsor and portfolio manager of the program.

B. Related Persons

Hackman Financial Group personnel serve as portfolio managers for this Wrap Fee Program.

C. Performance-Based Fees

Hackman Financial Group does not charge performance-based fees.

D. Supervised Persons

Hackman Financial Group Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

D. Methods of Analysis

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Brochure) for details on the research and analysis methods employed by the Advisor.

E. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Hackman Financial Group will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.

F. Proxy Voting

Hackman Financial Group does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 7 – Client Information Provided to Portfolio Managers

Hackman Financial Group is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the Hackman Financial Group Privacy Policy (included after this Wrap Fee Program Brochure).

Item 8 – Client Contact with Portfolio Managers

Hackman Financial Group is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at Hackman Financial Group.

Item 9 – Additional Information

A. Disciplinary Information and Other Financial Industry Activities and Affiliations

Hackman Financial Group values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 282027. Please see Item 9 of the Hackman Financial Group Disclosure Brochure as well as Item 3 of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

Other Financial Activities and Affiliations

Please see Items 10 and 14 of the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Brochure).

B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information

Hackman Financial Group has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to Hackman Financial Group's compliance program (our "Supervised Persons"). Complete details on the Hackman Financial Group Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by the Chief Compliance Officer ("CCO"). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

Other Compensation

Hackman Financial Group has established institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from LPL Financial: financial start-up support; reimbursement to Clients for transfer costs to the platform/custodian; receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Brochure) for details on additional compensation that may be received by Hackman Financial Group or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Brochure) provides details on any outside business activities and the associated compensation.

Client Referrals from Solicitors

Hackman Financial Group may engage and compensate unaffiliated third-party referral sources (a "Solicitor") for Client referrals. Clients will not pay a higher fee to Hackman Financial Group as a result of such payments to a Solicitor. The Advisor shall enter into an agreement with the Solicitor, which requires that full disclosure of the compensation and other conflicts is provided to the prospective client prior to or at the time of entering into the advisory agreement.

Financial Information

Neither Hackman Financial Group, nor its management has any adverse financial situations that would reasonably impair the ability of Hackman Financial Group to meet all obligations to its Clients. Neither Hackman Financial Group, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. Hackman Financial Group is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance. Please see Item 18 of the Form ADV Part 2A – Disclosure Brochure.



Form ADV Part 2B – Brochure Supplement

for

**Michael R. Hackman
President and Chief Compliance Officer**

Effective: February 15, 2018

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Michael R. Hackman (CRD# 1738446) in addition to the information contained in the HFG Advisors, Inc. d/b/a Hackman Financial Group, Inc. ("Hackman Financial Group", CRD# 282027) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Hackman Financial Group Disclosure Brochure or this Brochure Supplement, please contact us at (513) 891-5300.

Additional information about Mr. Hackman is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1738446.

Item 2 – Educational Background and Business Experience

Michael R. Hackman, born in 1964, is the President of Hackman Financial Group. Mr. Hackman earned a Bachelor of Science in Finance from Miami University in 1987. Additional information regarding Mr. Hackman's employment history is included below.

Employment History:

President, HFG Advisors Inc. d/b/a Hackman Financial Group	04/2016 to Present
Registered Representative, LPL Financial LLC	09/2009 to Present
Registered Representative, Mutual Service Corporation	01/1994 to 09/2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Hackman. Mr. Hackman has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Hackman.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Hackman.***

However, we do encourage you to independently view the background of Mr. Hackman on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1738446.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Hackman is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Hackman's separate capacity as a registered representative, Mr. Hackman will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Hackman. Neither the Advisor nor Mr. Hackman will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Hackman's separate capacity as a registered representative.

Insurance Agency Affiliations

Mr. Hackman is also a licensed insurance professional conducting business under our affiliated entity Hackman Financial, Inc. Implementations of insurance recommendations are separate and apart Mr. Hackman's role with Hackman Financial Group. As an insurance professional, Mr. Hackman may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Hackman is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Hackman or Hackman Financial Group.

Real Estate

Mr. Hackman manages multiple real estate rental properties. Mr. Hackman does not offer any rental property to any Clients and spends less than 5% of his time in this capacity.

Item 5 – Additional Compensation

Mr. Hackman has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Hackman serves as the President and Chief Compliance Officer of Hackman Financial Group. Mr. Hackman can be reached at (513) 891-5300.

Hackman Financial Group has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Hackman Financial Group. Further, Hackman Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Hackman Financial Group and its Supervised Persons. As a registered entity, Hackman Financial Group is subject to examinations by regulators, which may be announced or unannounced. Hackman Financial Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of Hackman Financial Group.



Form ADV Part 2B – Brochure Supplement

for

**Steven D. Nguyen
Partner**

Effective: August 2, 2017

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Steven D. Nguyen (CRD# 2502027) in addition to the information contained in the HFG Advisors, Inc. d/b/a Hackman Financial Group, Inc. ("Hackman Financial Group", CRD# 282027) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Hackman Financial Group Disclosure Brochure or this Brochure Supplement, please contact us at (513) 891-5300.

Additional information about Mr. Nguyen is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2502027.

Item 2 – Educational Background and Business Experience

Steven D. Nguyen, born in 1970, is a Partner of Hackman Financial Group. Mr. Nguyen earned an MBA from Butler University in 1997. Mr. Nguyen also earned a B.S. in Accounting from The Ohio State University in 1992. Additional information regarding Mr. Nguyen's employment history is included below.

Employment History:

Partner and Investment Advisor Representative, HFG Advisors Inc. d/b/a Hackman Financial Group	05/2016 to Present
Registered Representative, LPL Financial LLC	09/2009 to Present
Registered Representative, Mutual Service Corporation	04/1999 to 09/2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Nguyen. Mr. Nguyen has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Nguyen.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Nguyen.***

However, we do encourage you to independently view the background of Mr. Nguyen on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2502027.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Nguyen is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Nguyen's separate capacity as a registered representative, Mr. Nguyen will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Nguyen. Neither the Advisor nor Mr. Nguyen will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Nguyen's separate capacity as a registered representative.

Insurance Agency Affiliations

Mr. Nguyen is also a licensed insurance professional conducting business under our affiliated entity Hackman Financial, Inc. Implementations of insurance recommendations are separate and apart Mr. Nguyen's role with Hackman Financial Group. As an insurance professional, Mr. Nguyen may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Nguyen is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Nguyen or Hackman Financial Group.

Assistant Football Coach

Mr. Nguyen is also employed as an assistant football coach for the t Lakota School District in West Chester, Ohio. Mr. Nguyen spends approximately 10% of his time serving in this capacity.

Item 5 – Additional Compensation

Mr. Nguyen is dedicated to the investment advisory activities of Hackman Financial Group' Clients. Mr. Nguyen does not receive any additional forms of compensation.

HFG Advisors, Inc. d/b/a Hackman Financial Group
7355 E. Kemper Road, Suite A, Cincinnati, OH 45249
Phone: (513) 891-5300
<http://www.hackmanfinancial.com>

Item 6 – Supervision

Mr. Nguyen serves as a Partner of Hackman Financial Group and is supervised by Michael Hackman, the Chief Compliance Officer. Michael Hackman can be reached at (513) 891-5300.

Hackman Financial Group has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Hackman Financial Group. Further, Hackman Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Hackman Financial Group and its Supervised Persons. As a registered entity, Hackman Financial Group is subject to examinations by regulators, which may be announced or unannounced. Hackman Financial Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of Hackman Financial Group.



Form ADV Part 2B – Brochure Supplement

for

**John C. Spencer, IV
Director, Wealth Management**

Effective: February 13, 2018

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of John Spencer (CRD# 2621599) in addition to the information contained in the HFG Advisors, Inc. d/b/a Hackman Financial Group, Inc. ("Hackman Financial Group", CRD# 282027) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Hackman Financial Group Disclosure Brochure or this Brochure Supplement, please contact us at (513) 891-5300.

Additional information about Mr. Spencer is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2621599.

Item 2 – Educational Background and Business Experience

John Spencer, born in 1959, is the Director of Wealth Management of Hackman Financial Group. Mr. Spencer earned a Bachelor of Science in Industrial Relations from Xavier University in 1981. Mr. Spencer also earned a Master of Business Administration from Xavier University. Additional information regarding Mr. Spencer's employment history is included below.

Employment History:

Director of Wealth Management, HFG Advisors Inc. d/b/a Hackman Financial Group	04/2016 to Present
Registered Representative, LPL Financial LLC	02/2015 to Present
Financial Advisor, Ameriprise Financial Services, Inc	02/2009 to 02/2015
Financial Advisor, Raymond James Financial Services Advisors, Inc	01/2009 to 02/2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Spencer. Mr. Spencer has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Spencer.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Spencer.***

However, we do encourage you to independently view the background of Mr. Spencer on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2621599.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Spencer is also a registered representative of LPL Financial LLC ("LPL"). LPL is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Spencer's separate capacity as a registered representative, Mr. Spencer will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Spencer. Neither the Advisor nor Mr. Spencer will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Spencer's separate capacity as a registered representative.

Insurance Agency Affiliations

Mr. Spencer is also a licensed insurance professional conducting business under our affiliated entity Hackman Financial, Inc. Implementations of insurance recommendations are separate and apart Mr. Spencer's role with Hackman Financial Group. As an insurance professional, Mr. Spencer may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Spencer is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Spencer or Hackman Financial Group.

Rugby Coach and Referee

Mr. Spencer is also the head rugby coach at St. Xavier High School in Cincinnati, Ohio. Mr. Spencer spends approximately 5% of his time in this capacity.

Mr. Spencer is also a rugby referee for the Ohio Rugby Referees Society and the Midwest Rugby Referees Society. Mr. Spencer spends approximately 5% of his time in this capacity.

Item 5 – Additional Compensation

Mr. Spencer has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Spencer serves as the Director of Wealth Management of Hackman Financial Group and is supervised by Michael Hackman, the Chief Compliance Officer. Mr. Hackman can be reached at (513) 891-5300.

Hackman Financial Group has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Hackman Financial Group. Further, Hackman Financial Group is subject to regulatory oversight by various agencies. These agencies require registration by Hackman Financial Group and its Supervised Persons. As a registered entity, Hackman Financial Group is subject to examinations by regulators, which may be announced or unannounced. Hackman Financial Group is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of Hackman Financial Group.

Privacy Policy

Effective Date: February 13, 2018

Our Commitment to You

HFG Advisors, Inc. ("Hackman Financial Group" or the "Advisor") is committed to safeguarding the use of personal information of our Clients' (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Hackman Financial Group (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Hackman Financial Group does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Hackman Financial Group does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Hackman Financial Group or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients Hackman Financial Group does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (513) 891-5300.