

R. H. HANSFORD & CO., INC

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This brochure (“Brochure”) provides information about the qualifications and business practices of R. H. Hansford & Co, Inc, a registered investment adviser. Registration does not imply a certain level of skill or training. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”), or by any state securities authority.

If you have any questions about the contents of this brochure, please contact us at: [\(305\) 868-9200](tel:(305)868-9200) or by email at: RHHansford@aol.com. Additional information about R. H. Hansford & Co. Inc. is available on the SEC's website at www.asdvisorinfo.sec.gov

Item 2 - Material Changes

Since the last updating amendment to R.H. Hansford & Co, Inc. Form ADV Part 2 brochure on March 24, 2020, we note that this Brochure dated December 22, 2020 is a new document prepared according to the SEC's requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require. Below are material changes since the last annual updating amendment:

1. Item 14 - we no longer provide compensation for client referrals

In addition, we made minor clarifications to Item 4 regarding the fee schedule, Item 12 that we do not use soft dollar benefits to manage client accounts and to Item 18 as it relates to a loan received by R.H. Hansford & Co, Inc. under the Payroll Protection Program.

Pursuant to SEC rules, we will ensure that you receive a summary of any material changes to this and subsequent materials within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes, as necessary.

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

Currently, this brochure may be requested by contacting R.H. Hansford & Co, Inc. at [\(305\) 868-9200](tel:3058689200) or RHHansford@aol.com.

Additional information about R. H. Hansford & Co, Inc. is also available via The SEC's company's website: www.advisorinfo.sec.gov. The SEC's Website also provides information about any persons affiliated with R. H. Hansford & Co., Inc. who are registered, or are required to be registered, as investment advisor representatives or R. H. Hansford & Co., Inc.

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Item 4 - Advisor Business

A. R.H. Hansford & Co., Inc. ("RHH") is a registered investment advisor located in Miami Beach, Florida and registered with the SEC.

RHH was founded by Rosemary Hoffman Hansford in 1994. The company has been in business since June 30, 1994.

B. RHH provides discretionary money management for its clients. RHH invests primarily in no load mutual funds. Occasionally, a loaded fund will be purchased because of its unique investment objective. Additionally, an equity security may be purchased in the current economic environment to take advantage of its dividend return.

RHH uses sector funds as well as broad based funds in its portfolios. The sector funds may be single industry or single country or geographic area. RHH does not invest in ETFs (exchange traded mutual funds).

C. RHH profiles each prospective client extensively, including a complete financial profile and an analysis of risk tolerance. Each account is managed completely individually based upon the needs and desires of the client. Occasionally, a client will impose a restriction such as a desire not to be exposed to a particular geographical area. These requests are honored.

D. RHH does not participate in any Wrap Fee Programs.

E. Although most accounts are managed on a discretionary basis, some clients occasionally ask that RHH purchase a particular security for their account. If this occurs, RHH requests a written directive, before the transaction is executed.

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Clients sometime ask that RHH help them select investments from a list offered to them in their 401(k) or 403(b) plans offered by their employers. RHH provides this advisory service although it does not take discretion on these accounts.

As of January 1, 2020 RHH, had a total of \$37,344,857.00 under management on a discretionary basis and \$29,610,000.00 under management on a purely advisory basis for a total of \$66,954,857.00.

Item 5 - Fees and Compensation

A. RHH is a fee-based advisor. Fees are based on a percentage of the dollar value of the assets under management. There is a sliding scale from 2% annually to 1% annually. However, since 2017, new clients pay a sliding scale from 1.5% to 1% annually. Assets within one family are aggregated to determine the total amount under management per family. Fees are negotiable based upon the size and complexities of the account. The fee is paid quarterly based upon the value of the account as of the close of business on the last day of the quarter as determined by the custodian.

B. Generally, fees are deducted directly from each account. However, if one client maintains a taxable account as well as a tax preferred account(s) such as an IRA and/or a pension plan, the fees may be aggregated and deducted from the taxable account for tax purposes. Some accounts are billed separately at the request of the client.

C. In addition to RHH's investment advisory fee, clients will also incur, relative to mutual fund investments, normal expenses and advisory fees imposed by the mutual funds held in the account (expense ratios are listed in each fund's annual report.)

Also, the account custodian/broker will charge commissions for trading of non-mutual fund assets. Some mutual funds impose fees if they are sold prior to their short-term holding periods. Short term trading fees are detailed in each mutual fund's prospectus. RHH does not accept any compensation from any of the fees described above.

D. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

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

RHH has several clients who pay a percent of profits management fee. They are "qualified persons" as defined by SEC Rule 205(3). All of them have been advised that the SEC believes that this arrangement may be a conflict of interest and may be an incentive to trade these accounts more aggressively. RHH no longer offers this method of billing to new clients or to existing clients who did not choose this option at the time they opened their accounts.

Item 7 – Types of Clients

RHH provides investment advice to individuals, high net worth individuals, trusts, estates, UTMA's, IRA and pension plans but will manage fund selection for individuals whose 401(k) or 403(b) plan administrators use mutual funds and will allow adding an advisor to such an account.

To open an RHH managed account there is a minimum opening balance of \$500,000.00. Under certain circumstances, this minimum requirement may be waived.

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

A. RHH specializes in building managed portfolios of mutual funds to meet our client's financial needs and risk tolerance. The emphasis is on long term growth. RHH does not participate in short term trading which gives rise to short term capital gains. This approach also minimizes the chance of incurring short term trading fees that some fund families charge. The overwhelming majority of funds chosen are no load funds so there are no trading costs associated with long term trades.

B. Each portfolio typically contains broad-based funds, index funds and sector funds. The conservative portfolios contain higher proportions of broad based and index funds as these are the most diversified and less volatile than sector funds. The more aggressive portfolios contain higher proportions of sector funds which tend to be more volatile. Sector funds are chosen using fund mutual research momentum studies as well as economic conditions in the particular industry or geographic area.

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RHH also uses Morningstar, financial periodicals, fund family weekly, monthly and quarterly updates as well as web casts. Other factors RHH considers in choosing mutual funds include: Historical performance, overall volatility, style box position, industry sector weighting, cash level, foreign exposure, expense ratio, and manager history.

C. Investing in mutual funds and equities involves volatility and risk of loss.

Item 9 - Disciplinary Information

9.A, 9.B, and 9.C

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of RHH or the integrity of RHH's management. RHH and its management team have no legal or disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Rosemary Hoffman Hansford and April Murphy have no other financial industry activities and affiliations other than with RHH.

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

A. RHH has adopted a Code of Ethics for all members of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. Rosemary Hoffman Hansford and April Murphy must acknowledge the terms of the Code of Ethics annually, or as amended. As any of the following situations may represent a conflict of interests, RHH has established the following restrictions in order to ensure its fiduciary responsibilities:

- RHH recognizes the right of a client to specify investment objectives, guidelines and/or conditions for the overall management of his account. Hansford and Murphy and members of their immediate families may not buy or sell securities for their personal portfolio(s) if their decision is derived in whole or in part, by reason of their personal employment, unless the information is publicly available.
- No member of the firm will put her own interests ahead of any client. This means they may not purchase or sell individual securities being considered for, or being held by client accounts, without preclearance of RHH's compliance officer.
- Hansford and Murphy may not participate in private placement or initial public offerings (IPOs) without preclearance of RHH's compliance officer.

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- The firm requires that the individuals must act in accordance with the applicable federal and state regulations governing registered investment advisory practices.
- Records will be maintained of all non-exempt securities bought or sold by the firm RHH. Rosemary Hoffman Hansford and April Murphy will review these records on a regular basis.
- In accordance with Section 204-A of the Investment Advisers Act of 1940, RHH also maintains and enforces written policies reasonably designed to prevent the misuse of material non- public information available to any person associated with RHH.

RHH's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Rosemary Hoffman Hansford at (305) 868-9200 or RHHansford@aol.com

B. Hansford and Murphy do not recommend, buy or sell any securities for their client's accounts in which they have a material financial interest.

C. Hansford and Murphy may invest in the same mutual funds that are recommended, bought and sold for their clients' accounts. There are no conflicts of interests created by this practice due to the way open ended mutual funds operate.

D. Hansford and Murphy may buy and sell mutual funds for their client's accounts and their own accounts at the same time. This does not create a conflict of interests since all orders are traded for the same closing NAV price on the day of the trade execution. All parties will receive the same execution pricing on these transactions.

When purchasing any individual security (other than open end mutual funds) for clients, all client orders must be executed prior to any purchase for Rosemary Hoffman Hansford, April Murphy and their family members. Similarly, when selling individual securities (other than open end mutual funds) for clients, all client orders must be executed prior to any sale for Rosemary Hoffman Hansford, April Murphy and their family members.

Item 12 - Brokerage Practices

A. RHH does not take custody of any client accounts. The majority of these accounts are established with Fidelity Institutional Wealth Services ("FIWS") through Fidelity Brokerage Services ("FBS"), an unaffiliated service provider. Factors which RHH considers in recommending FBS for client's accounts include its financial strength, reputation, execution, pricing, reporting, research and service. However, clients are free to choose other custodians and other accounts exist at brokerages chosen by clients and on accounts where advice is given on 401(k) and 403(b) accounts.

1. Research and Other Soft Dollar Benefits:

a. RHH receives research, web casts and execution related services from FIWS or FBS to assist RHH in managing its accounts. These services and products include financial publications, pricing information, periodic phone conferences on market topics and periodic seminars. RHH also receives web casts, financial publications, pricing information and phone conferences from all mutual fund companies whose products we purchase for our clients. Such research and executed related services are offered to all investment advisers who utilize these firms.

- b. The commissions charged by FBS as broker dealer or other broker dealer custodians which hold our clients' accounts, may be higher (on non-open-ended mutual funds) than those charged by a broker dealer who does not provide the aforementioned services.
- c. Since RHH primarily holds no load mutual funds in its clients' portfolios, our clients do not pay markups higher than those charged by other broker dealers in return for soft dollar benefits.
- d. RHH does not have any formal soft dollar arrangements. FIWS, FBS, and mutual fund families provide RHH with investment research products and services regardless of trading volume. Such products and services are used to service all our clients.

2. Brokerage for Client Referrals

RHH does not receive client referrals from FIWS or FBS or any other custodian holding our clients funds. RHH does not consider obtaining referrals as criteria in its recommendation of a broker dealer.

Item 13 - Review of Accounts

A. Rosemary Hoffman Hansford and/or April Murphy will review all client accounts at least monthly. The current investment strategy will be reviewed annually with each client and revisions are made as needed based upon a client's changing circumstances. RHH is always available to discuss these changes with clients via telephone, email, or written correspondence.

B. More frequent reviews often occur when requested by the client or suggested by Rosemary Hoffman Hansford or April Murphy based on factors such as the general economy, market conditions, or changes in client circumstances.

All clients are asked to provide access to their accountants as RHH, as a matter of policy, contacts accountants during the last quarter of each year to discuss tax ramifications of year end buying and selling in all taxable accounts.

Item 14 - Client Referrals

RHH does not provide compensation to any individuals or entities for client referrals.

Item 15 - Custody

Clients receive statements from the custodian which holds and maintains their assets at least quarterly. For those clients whose accounts are held at Fidelity, the statements are monthly. Clients also receive trade confirmations, year-end statements, and, where applicable, tax reporting statements from the custodian.

Item 16 - Investment Discretion

In most cases, RHH receives discretionary authority from each client at the outset of the advisory relationship to select the identity and amount of securities to be bought or sold. Such discretion is to be exercised in a manner consistent with the stated investment objectives for the client's account.

When selecting securities and determining amounts, RHH observes the investment policies, limitations and restrictions of the clients which it advises.

In the case of 401(k) and 403(b) accounts provided by a client's employer RHH often does not take discretion. Rather, clients provide their most recent statements and listing of available fund choices to RHH. RHH then makes recommendations and clients execute their own trades. Often clients who have discretionary accounts with RHH ask that their other accounts be reviewed on a quarterly basis.

Item 17 - Voting Client Securities

As a matter of firm policy and practice, RHH does not vote proxies on behalf of its clients. Clients retain the responsibility for receiving and voting proxies. RHH may, if asked, provide advice to clients regarding their voting of proxies.

Item 18 - Financial Information

RHH is not required to provide financial information in this Brochure because:

- RHH does not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 months.
- RHH does not take custody of client funds or securities.
- RHH does not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.

However, there are several financial programs available to small businesses like ours to help us navigate the COVID-19 pandemic. One program is the Paycheck Protection Program (PPP) established by the U.S. Small Business Administration. We have applied for and received funding from this program. Though it is currently not the case, it is important to note that the circumstances leading us to seek this for loan, the uncertainty of the pandemic and the sharp market volatility, resulted in an anticipation that we may need the funds to support our ongoing operations. We currently meet our financial obligations and continue to service your accounts to the best of our abilities. While not anticipated, we will notify you and explain the steps we intend to take to address them should our financial condition change.

Additionally, RHH has never been the subject of a bankruptcy proceeding.