



HFM Investment Advisors, LLC

Form ADV Part 2A – Firm Brochure

Dated April 27, 2021

209 Rowan Blvd
Glassboro, NJ 08028

856-232-2270
www.hfmadvisors.com

This Brochure provides information about the qualifications and business practices of HFM Investment Advisors, LLC, “HFM”. If you have any questions about the contents of this Brochure, please contact us at (856) 232-2270. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

HFM Investment Advisors, LLC is registered as an Investment Advisor with the State of New Jersey. Registration of an Investment Advisor does not imply any level of skill or training.

Additional information about HFM is available on the SEC’s website at www.advisorinfo.sec.gov which can be found using the firm’s identification number 289103.

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of HFM Investment Advisors, LLC on 01/15/2021 are described below. Material changes relate to HFM Investment Advisors, LLC's policies, practices or conflicts of interests.

- HFM Investment Advisors, LLC has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.
- HFM Investment Advisors, LLC has expanded the services provided to employer-sponsored retirement plans and their participants. A more detailed description of these services can be found in Item 4 of this brochure.

Item 3: Table of Contents

Contents

Item 2: Material Changes	2
Item 3: Table of Contents	3
Item 4: Advisory Business.....	4
Item 5: Fees and Compensation.....	10
Item 6: Performance-Based Fees and Side- By-Side Management	14
Item 7: Types of Clients	14
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	14
Item 9: Disciplinary Information.....	16
Item 10: Other Financial Industry Activities and Affiliations	16
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	17
Item 12: Brokerage Practices	18
Item 13: Review of Accounts.....	19
Item 14: Client Referrals and Other Compensation.....	20
Item 15: Custody	21
Item 16: Investment Discretion.....	22
Item 17: Voting Client Securities	22
Item 18: Financial Information	23
Michael P. Pallozzi	24
Jason F. Gabrieli, CFP®	27
Catherine B. Allen-Carlozo, CFP®, RICP®	30

Item 4: Advisory Business

Description of Advisory Firm

HFM Investment Advisors, LLC is registered as an Investment Advisor located in the State of New Jersey. We were founded on June 12, 2017. Michael P. Pallozzi and Jason F. Gabrieli are the principal owners of HFM. HFM offers discretionary management activities, provides ongoing continuing investment supervisory services, financial planning, and Retirement Plan Services.

Types of Advisory Services

Investment Advisory Services

We offer investment management services by outsourcing asset management, where appropriate, to third-party money managers ("Subadvisors") for portfolio management services. We presently use First Ascent Asset Management as subadvisor for the majority of our investment management. Some legacy clients also use Morningstar Investment Services LLC and Brinker Capital, Inc's subadvisory services. We assist clients in selecting an appropriate allocation model, completing the Subadvisor's investor profile questionnaire, interacting with the Subadvisor and reviewing the Subadvisor.

HFM refers clients to other investment advisors to manage their accounts. This situation creates a conflict of interest. However, when referring clients to another investment advisor, the client's best interest and suitability of the other investment advisors will be the main determining factors of HFM. This relationship is disclosed to the client at the commencement of the advisory relationship. You are not obligated, contractually or otherwise, to use the services of any other investment advisors we recommend. Additionally, HFM will only recommend another investment advisor who is properly licensed or registered as an investment advisor in the state where the client resides.

Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure. This service may be terminated 14 calendar days written notice.

Financial Planning

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they impact and are impacted by the entire financial and life situation of the client.

The client always has the right to decide whether or not to act upon our recommendations. If the client elects to act on any of the recommendations, the client always has the right to affect the transactions through anyone of their choosing. This service may be terminated 14 calendar days

written notice.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **Portfolio Analysis:** This is a service we offer which will look deeply into the holdings of a client's portfolio during analysis.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significantly adverse effect on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may affect your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

It is incumbent on the client to advise us about financial planning issues, and whether they want to sit down with us and address financial planning matters. We believe financial planning is important and there should be an ongoing review. However, if the client does not take advantage of this offer, then there is no change in our fee schedule.

Annual Ongoing Financial Planning

Clients desiring an ongoing relationship after delivery of financial plan, we offer ongoing planning for clients in the execution of their financial plan. These clients will also receive updates to their financial plans (as needed) and ongoing support with execution on their financial plan, via phone and emails. This service may be terminated 14 calendar days written notice.

Retirement Plan Services

We offer (1) Non-Discretionary Investment Advisory Services and/or (2) Retirement Plan Consulting Services to employer-sponsored retirement plans and their participants. Depending on the type of the Plan and the specific arrangement with the Sponsor, we may provide one or more of these services. Prior to being engaged by the Sponsor, we will provide a copy of this Form ADV Part 2A along with a copy of our Privacy Policy and Retirement Plan Agreement ("Agreement") that contains the information required under Sec. 408(b)(2) of the Employee Retirement Income Security Act ("ERISA") as applicable.

The Agreement authorizes our Investment Adviser Representatives ("IARs") to deliver one or more of the following services:

Non-Discretionary Fiduciary Services

These services are designed to allow the Sponsor to retain full discretionary authority or control over assets of the Plan. We will solely be making recommendations to the Sponsor. We will perform these Non-Discretionary investment advisory services through our IARs and charge fees as described in this Form ADV and the Agreement. If the Plan is covered by ERISA, we will perform these investment advisory services to the Plan as a "fiduciary" defined under ERISA Section 3(21). The Sponsor may engage us to perform one or more of the following Non-Discretionary investment advisory services:

INVESTMENT POLICY STATEMENT ("IPS"):

Advisor will review with Sponsor the investment objectives, risk tolerance and goals of the Plan. If the Plan does not have an IPS, Advisor will provide recommendations to Sponsor to assist with establishing an IPS. If the Plan has an existing IPS, Advisor will review it for consistency with the Plan's objectives. If the IPS does not represent the objectives of the Plan, Advisor will recommend to Sponsor revisions to align the IPS with the Plan's objectives.

ADVICE REGARDING DESIGNATED INVESTMENT ALTERNATIVES ("DIAs"):

Based on the Plan's IPS or other guidelines established by the Plan, Advisor will review the investment options available to the Plan and will make recommendations to assist Sponsor with selecting DIAs to be offered to Plan participants. Once Sponsor selects the DIAs, Advisor will, on a periodic basis and/or upon reasonable request, provide reports and information to assist

Sponsor with monitoring the DIAs. If a DIA is required to be removed, Advisor will provide recommendations to assist Sponsor with replacing the DIA.
ADVICE REGARDING QUALIFIED DEFAULT INVESTMENT ALTERNATIVE ("QDIA(s)"): Based on the Plan's IPS or other guidelines established by the Plan, Advisor will review the investment options available to the Plan and will make recommendations to assist Sponsor with selecting or replacing the Plan's QDIA(s).
PARTICIPANT INVESTMENT ADVICE: Advisor will meet with Plan participants, upon reasonable request, to collect information necessary to identify the Plan participant's investment objectives, risk tolerance, time horizon, etc. Advisor will provide written recommendations to assist the Plan participant with creating a portfolio using the Plan's DIAs or Models, if available. The Plan participant retains sole discretion over the investment of his/her account.

Retirement Plan Consulting Services
Retirement Plan Consulting Services are designed to allow our IARs to assist the Sponsor in meeting his/her fiduciary duties to administer the Plan in the best interests of Plan participants and their beneficiaries. Retirement Plan Consulting Services are performed so that they would not be considered "investment advice" under ERISA. The Sponsor may elect for our IARs to assist with any of the following services:
Administrative Support
✓ Assist Sponsor in reviewing objectives and options available through the Plan
✓ Review Plan committee structure and administrative policies/procedures
✓ Recommend Plan participant education and communication policies under ERISA 404(c)
✓ Assist with development/maintenance of fiduciary audit file and document retention policies
✓ Deliver fiduciary training and/or education periodically or upon reasonable request
✓ Recommend procedures for responding to Plan participant requests
Service Provider Support
✓ Assist fiduciaries with a process to select, monitor and replace service providers
✓ Assist fiduciaries with review of Covered Service Providers ("CSP") and fee benchmarking
✓ Provide reports and/or information designed to assist fiduciaries with monitoring CSPs
✓ Assist with use of ERISA Spending Accounts or Plan Expense Recapture Accounts to pay CSPs
✓ Assist with preparation and review of Requests for Proposals and/or Information
✓ Coordinate and assist with CSP replacement and conversion
Investment Monitoring Support
✓ Periodic review of investment policy in the context of Plan objectives
✓ Assist the Plan committee with monitoring investment performance
✓ Assist with monitoring Designated Investment Managers and/or third-party advice providers
✓ Educate Plan committee members, as needed, regarding replacement of DIA(s) and/or QDIA(s)
Participant Services
✓ Facilitate group enrollment meetings and coordinate investment education
✓ Assist Plan participants with financial wellness education, retirement planning and/or gap analysis

Potential Additional Retirement Services Provided Outside of the Agreement

In providing Retirement Plan Services, we and our IARs may establish a client relationship with one or more Plan participants or beneficiaries. Such client relationships develop in various ways, including, without limitation:

- as a result of a decision by the Plan participant or beneficiary to purchase services from us not involving the use of Plan assets;
- as part of an individual or family financial plan for which any specific recommendations concerning the allocation of assets or investment recommendations relating to assets held outside of the Plan; or
- through a rollover of an Individual Retirement Account ("IRA Rollover").

If we are providing Retirement Plan Services to a plan, IARs may, when requested by a Plan participant or beneficiary, arrange to provide services to that participant or beneficiary through a separate agreement. If a Plan participant or beneficiary desires to affect an IRA Rollover from the Plan to an account advised or managed by us, IAR will have a conflict of interest if his/her fees are reasonably expected to be higher than those we would otherwise receive in connection with the Retirement Plan Services. IAR will disclose relevant information about the applicable fees charged by us prior to opening an IRA account. Any decision to affect the rollover or about what to do with the rollover assets remain that of the Plan participant or beneficiary alone.

In providing these optional services, we may offer employers and employees information on other financial and retirement products or services offered by us and our IARs.

Selection of Other Advisers

We may direct clients to third-party investment advisers. Before selecting other advisers for clients, we will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where our firm is recommending the adviser to clients.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon a client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

HFM's has the following assets under management:

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated:
\$148,349,165	\$0.00	December 2020

Item 5: Fees and Compensation

Investment Advisory Services

HFM's standard advisory fee is based on the market value of the account and is calculated as follows:

Account Value	Annual Advisory Fee
\$1 - \$250,000	1.50%
\$250,000 - \$500,000	1.40%
\$500,000 - \$1,000,000	1.20%
\$1,000,000 - \$1,500,000	1.00%
\$1,500,000 - \$2,000,000	0.90%
\$2,000,000 - \$3,000,000	0.80%
\$3,000,000 - \$3,600,000	0.70%
\$3,600,000 and above	Flat \$25,000

The annual fees are negotiable and are pro-rated and are paid in advance on a quarterly basis. The balance in the client's account on the last day of the prior billing period is used to determine the market value of the assets upon which the advisory fee is based.

Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice. Upon termination of the account, any unearned fee will be refunded to the client on a prorated basis.

Clients may terminate the agreement without penalty, for full refund of HFM's fees, within five business days of signing the Investment Advisory Agreement. Thereafter, clients may terminate the Investment Advisory Agreement with fourteen days' written notice.

Subadvisor Services Fees

HFM will use subadvisors (unaffiliated third-party advisors) to manage client assets. This relationship will be memorialized in each contract between HFM and the third-party advisor.

HFM will be paying First Ascent's fees from the firm's revenue and First Ascent will debit the firm's fee from client accounts quarterly in advance, deduct their applicable fees from the firm's total fees collected, and transmit the remainder to the firm. Client's will not be directly paying for First Ascent services.

HFM Ignite Fees

HFM may specifically direct clients to Betterment LLC. The annual fee schedule is as follows:

Account Value	HFM's Fee	Betterment's Fee	Annual Advisory Fee
All Assets	0.40%	0.20%	0.60%

Fees are paid quarterly in arrears. Fees for selection of Betterment LLC as third-party adviser are withdrawn by Betterment LLC directly from client accounts. HFM then receives its portion of the fees from Betterment LLC. HFM does not directly deduct the advisory fees.

Financial Planning Fixed Fees

Initial Financial Planning Fee is up to \$15,000.

Ongoing Annual Financial Planning Fee is entirely included in investment advisory fees collected on IA managed Client assets of \$500,000 or more. If Client IA managed assets are less than \$500,000, Client shall be billed annually the difference between the investment advisory fees collected in the preceding 12 months and the ongoing annual financial planning fee of up to \$15,000.

Financial Planning will generally be offered on a fixed fee basis. The fixed fee will be agreed upon before the start of any work. The fixed fee can range between \$5,000 and \$15,000. The fee is negotiable. If a fixed fee program is chosen, half of the fee is due at the beginning of process and the remainder is due at completion of work, however, HFM will not bill an amount above \$500 more than 6 months in advance. At the discretion of HFM, clients may pay the amount in monthly or quarterly installments. In the event of early termination, the client will be billed for the hours worked at a rate of \$250 per hour. If the initial deposit is greater than the amount billed, then the client will be refunded the difference. If the initial deposit is less, then the client will be billed the difference. Clients may pay by check or ACH/credit card via third party processor.

Retirement Plan Services Fees

Fees for the Retirement Plan Services (“Fees”) are negotiable and vary based upon the nature, scope and frequency of our services as well as the size and complexity of the plan. A general description of the different types of fees for Retirement Plan Services appears in the fee schedule below:

Fee Type	Fee Range	
Asset-Based Fees	Plan Assets	Annual Advisory Fee
	\$0- \$2,999,999	0.75 %
	\$3,000,000 - \$4,999,999	0.55%
	\$4,999,999 - \$9,999,999	0.35%
	\$10,000,000 - \$14,999,999	0.25%
	\$15,000,000 - \$19,999,999	0.15%
	\$20,000,000 and above	Negotiable
Flat Fees	Negotiable based upon size of plan, number of participants, nature, scope and frequency of services provided	
Project or Hourly Fees	Negotiable based upon scope of work performed	

Depending upon the capabilities and requirements of the Plan’s recordkeeper or custodian, we may collect our Fees in arrears or in advance. Typically, Sponsors instruct the Plan’s recordkeeper or custodian to automatically deduct our Fees from the Plan account; however, in some cases a Sponsor may request that we send invoices directly to the Sponsor or recordkeeper/custodian.

Sponsors receiving Retirement Plan Services may pay more than or less than a client might otherwise pay if purchasing the Retirement Plan Services separately or through another service provider. There are several factors that determine whether the costs would be more or less, including, but not limited to, the size of the Plan, the specific investments made by the Plan, the number of or locations of Plan participants, services offered by another service provider, and the actual costs of Retirement Plan Services purchased elsewhere. In light of the specific Retirement Plan Services offered by us, the Fees charged may be more or less than those of other similar service providers.

In determining the value of the Account for purposes of calculating any asset-based Fees, Advisor will rely upon the valuation of assets provided by Sponsor or the Plan’s custodian or recordkeeper without independent verification.

Unless we agree otherwise, no adjustments or refunds will be made in respect of any period for (i) appreciation or depreciation in the value of the Plan account during that period or (ii) any partial withdrawal of assets from the account during that period. If the Agreement is terminated by us or by Sponsor, we will refund certain Fees to Sponsor to the extent provided in Section 8 of the Agreement. Unless we agree otherwise, all Fees shall be based on the total value of the assets in the account without regard to any debit balance.

All Fees paid to us for Retirement Plan Services are separate and distinct from the fees and expenses charged by mutual funds, variable annuities and exchange-traded funds to their shareholders. These fees and expenses are described in each investment's prospectus. These fees will generally include a management fee, other expenses, and possible distribution fees. If the investment also imposes sales charges, a client may pay an initial or deferred sales charge. The Retirement Plan Services we provide may, among other things, assist the client in determining which investments are most appropriate to each client's financial condition and objectives and to provide other administrative assistance as selected by the client. Accordingly, the client should review both the fees charged by the funds, the fund manager, the Plan's other service providers and the fees charged by us to fully understand the total amount of fees to be paid by the client and to evaluate the Retirement Plan Services being provided.

In the event we receive any third-party payments or subsidies in connection with our Retirement Plan Services, we will disclose such fees to Sponsors in accordance with ERISA and Department of Labor regulations.

No increase in the Fees will be effective without prior written notice.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, business owners, and employer retirement plans.

There is no account minimum for HFM Ignite.

The account minimum for other services is \$500,000, which may be waived at our discretion.

Our Retirement Plan Services are available to clients that are sponsors or other fiduciaries to plans, including 401(k), 457(b), 403(b) and 401(a) plans. Plans include participant-directed defined contribution plans and defined benefit plans. Plans may or may not be subject to ERISA.

We do not require a minimum asset amount for Retirement Plan Consulting Services.

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

As discussed in Item 4 above, we refer clients to Subadvisors. Our analysis of Subadvisors involves the examination of the experience, expertise, investment philosophies, and past performance of the Subadvisors in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. A risk of investing with an Subadvisor who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an Subadvisor's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory, or reputational deficiencies.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Advisor has no control over the risks taken by the underlying funds in which clients invest.

Subadvisors. Clients should review Item 8 of the Subadvisor's Form ADV Part 2A for applicable risks associated with their investment strategy.

Model portfolios are designed to capture return and risk at market rates. This seeks to provide clients with diversification benefits help to smooth returns, reduce volatility and decrease asset-class and single-strategy risks. Risks specific to using model portfolios include the possibility that the model portfolio will underperform the market and the possibility that the model will not be able take advantage of opportunities that a non-model portfolio management approach might capture. Model portfolios entail inflation (purchasing power) risk, interest rate risk, economic risk, market risk, political/regulatory risk, and asset allocation risk – meaning that any given asset allocation strategy does not guarantee any specific result or profit nor protect against a loss.

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

HFM and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of HFM or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No HFM employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No HFM employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Michael P Pallozzi is licensed and may engage in insurance product sales with our clients, for which he will receive additional compensation. Any commissions received through insurance sales do not offset advisory fees the client may pay for advisory services under HFM.

Recommendations or Selections of Other Investment Advisors

HFM outsources asset management, where appropriate, to third-party investment advisors (subadvisors). This situation creates a conflict of interest. However, when referring clients to another investment advisor, the client's best interest and suitability of the other investment advisors will be the main determining factors of HFM. This relationship is disclosed to the client at the commencement of the advisory relationship. You are not obligated, contractually or otherwise, to use the services of any other investment advisors we recommend. Additionally, HFM will only recommend another investment advisor who is properly licensed or registered as an investment advisor in the state where the client resides.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

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

From time to time, representatives of HFM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of HFM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. HFM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Trading Securities at/Around the Same Time as Client's Securities

From time to time, representatives of HFM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of HFM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. HFM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

HFM Investment Advisors, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services and the Subadvisor providing investment advisory services. We recommend custodians based on the reputation and services provided by the firm.

HFM participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. HFM receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

HFM Ignite

HFM also recommends Betterment Securities. Betterment Securities is responsible for execution of securities transactions and maintains custody of client assets. Betterment Securities exercises no discretion in determining if and when trades are placed; it places trades only at the direction of Betterment. Clients should understand that the appointment of Betterment Securities as the broker for their accounts held at Betterment may result in their receiving less favorable trade executions

than may be available through the use of broker-dealers that are not affiliated with Betterment. Participation in the HFM Ignite platform requires clients to place assets with or execute trades through Betterment Securities. Additional information regarding Betterment Securities can be found on FINRA's BrokerCheck.

1. Research and Other Soft-Dollar Benefits

HFM has access to research, products, or other services from its broker/dealer in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. HFM benefits by not having to produce or pay for the research, products or services, and HFM will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that HFM's acceptance of soft dollar benefits may result in higher commissions charged to the client. The firm will act in the client's best interest to keep commissions and/or brokerage fees reasonable.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We will require clients to use a specific broker-dealer to execute transactions.

Aggregating (Block) Trading for Multiple Client Accounts

If HFM or a subadvisor buys or sells the same securities on behalf of more than one client, it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, HFM or a subadvisor would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. HFM or a subadvisor would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with HFM and the subadvisor's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly on at least an annual basis by Jason F. Gabrieli, Vice President and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down,

volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

HFM may provide performance reports to Investment Management clients generated via the firm's data aggregation vendor. These reports should be reviewed by the client and compared to custodian account statements and performance reports.

We will contact you at least once a year to review our Retirement Plan Services. It is important that you discuss any changes in the Plan's demographic information, investment goals, and objectives with your IAR. Plans may receive written reports directly from their IAR based upon the services being provided, including any reports evaluating the performance of Plan investment manager(s) or investments.

Item 14: Client Referrals and Other Compensation

HFM receives compensation from third-party advisers to which it directs clients.

As disclosed under Item 12 above, HFM participates in TD Ameritrade's institutional customer program and HFM may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between HFM's participation in the program and the investment advice it gives to its Clients, although HFM receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving HFM participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to HFM by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by HFM's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit HFM but may not benefit its Client accounts. These products or services may assist HFM in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help HFM manage and further develop its business enterprise. The benefits received by HFM or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, HFM endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by HFM or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the HFM's choice of TD Ameritrade for custody and brokerage services.

HFM also receives from TD Ameritrade certain additional economic benefits (“Additional Services”) that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Salesforce, Concenter Services, Emoney Advisor, Asset Map, and Morningstar Advisor Workstation. TD Ameritrade provides the Additional Services to HFM in its sole discretion and at its own expense, and HFM does not pay any fees to TD Ameritrade for the Additional Services. HFM and TD Ameritrade have entered into a separate agreement (“Additional Services Addendum”) to govern the terms of the provision of the Additional Services.

HFM’s receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to HFM, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, HFM’s Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with HFM, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, HFM may have an incentive to recommend to its Clients that the assets under management by HFM be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. HFM’s receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

Item 15: Custody

HFM does not accept custody of client funds; however, when HFM deducts fees directly from client accounts at a selected custodian, HFM will be deemed to have limited custody of client’s assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you.

We will not serve as a custodian for Plan assets in connection with the Retirement Plan Services. Sponsor is responsible for selecting the custodian for Plan assets. We may be listed as the contact for the Plan account held at an investment sponsor or custodian. Sponsor for the Plan will complete account paperwork with the outside custodian that will provide the name and address of the custodian. The custodian for Plan assets is responsible for providing the Plan with periodic confirmations and statements. We recommend that Sponsor reviews the statements and reports received directly from the custodian or investment sponsor.

HFM Ignite

Betterment Securities maintains custody of Clients' assets that are managed by Betterment via HFM Ignite. Clients' account statements are available for review on the activity section of the Betterment for Advisors client portal. Clients receive periodic emails from Betterment with information about their accounts as well as links to account statements and they should carefully review those statements promptly.

Item 16: Investment Discretion

HFM provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Agreement established with each client outlines the discretionary authority for trading and the selection of subadvisors. Where discretion has been granted, HFM generally manages the client's account and makes investment decisions (including the delegation to subadvisors of all or part of the client's portfolio) without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share.

Item 17: Voting Client Securities

HFM will not ask for, nor accept voting authority for client securities. Proxies for assets managed by a subadvisor, shall be voted by the subadvisor unless otherwise directed in writing by you in the custodian's or subadvisor's paperwork.

In such cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

We have no authority or responsibility to vote any security held by the Plan or the related proxies. That authority is reserved by the Sponsor or trustee of the Plan.

Item 18: Financial Information

Registered Investment Advisors are required in this Item to provide you with certain financial information or disclosures about our financial condition.

In light of the COVID-19 coronavirus and historic decline in market values, HFM has elected to participate in the CARES Act's Paycheck Protection Program ("PPP") to strengthen its balance sheet. HFM intends to use this loan predominantly to continue payroll for the firm and may ultimately seek loan forgiveness per the terms of the PPP. Due to this and other measures taken internally, HFM has been able to operate and continue serving its clients.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$1,200 in fees per client six months in advance.

HFM Investment Advisors, LLC

209 Rowan Blvd
Glassboro, NJ 08028
(856) 232-2270
www.hfmadvisors.com

Form ADV Part 2B – Brochure Supplement

For

Michael P. Pallozzi

President & CEO

This brochure supplement provides information about Michael P. Pallozzi that supplements the HFM Investment Advisors, LLC (“HFM”) brochure. A copy of that brochure precedes this supplement. Please contact Michael P. Pallozzi if the HFM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Michael P. Pallozzi is available on the SEC’s website at www.advisorinfo.sec.gov which can be found using the identification number 1936691.

Item 2: Educational Background and Business Experience

Michael P. Pallozzi

Born: 1966

Educational Background

- 1989 – Bachelor of Arts, Rutgers University

Business Experience

- 06/2017 – Present, HFM Investment Advisors, LLC, President & CEO
- 06/2017 – 12/2020, HFM Investment Advisors, LLC, CCO
- 05/14/2004 – 12/31/2017, HFM Investment Advisors, Inc., President
- 03/1989 – 10/2014, MML Investor Services, LLC, Broker/ Dealer
- 01/1989 – 07/2014, Mass Mutual Life Insurance, Registered Representative

Item 3: Disciplinary Information

No management person at HFM Investment Advisors, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Michael P. Pallozzi is licensed and may engage in insurance product sales with our clients, for which he will receive additional compensation. Any commissions received through insurance sales do not offset advisory fees the client may pay for advisory services under HFM.

Item 5: Additional Compensation

Michael P. Pallozzi does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through HFM.

Item 6: Supervision

As a representative of HFM, Michael P. Pallozzi works closely with the supervisor, Jason F. Gabrieli, and all advice provided to clients is reviewed by the supervisor prior to implementation.

Michael P. Pallozzi adheres to applicable regulations regarding the activities of an Investment Adviser Representative, together with all policies and procedures outlined in the firm's code of ethics and compliance manual. Jason F. Gabrieli's phone number is 856-232-2270.

HFM Investment Advisors, LLC

209 Rowan Blvd
Glassboro, NJ 08028
(856) 232-2270
www.hfmadvisors.com

Form ADV Part 2B – Brochure Supplement

For

Jason F. Gabrieli, CFP®

Vice President & CCO

This brochure supplement provides information about Jason F. Gabrieli that supplements the HFM Investment Advisors, LLC (“HFM”) brochure. A copy of that brochure precedes this supplement. Please contact Jason F. Gabrieli if the HFM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Jason F. Gabrieli is available on the SEC’s website at www.advisorinfo.sec.gov which can be found using the identification number 5692911.

Item 2: Educational Background and Business Experience

Jason F. Gabrieli, CFP®

Born: 1986

Educational Background

- 2009 – Bachelor of Science, Finance, University of Maryland College Park

Business Experience

- 12/2020 – Present, HFM Investment Advisors, LLC, CCO
- 06/2017 – Present, HFM Investment Advisors, LLC, Vice President
- 09/2014 – 12/31/2017, HFM Investment Advisors, Inc., Associate Wealth Advisor
- 04/2011 – Present, Events By GM LLC, Partner
- 07/2009 – 02/2014, MML Investors Services, Inc., Registered Representative
- 06/2008 – 02/2014, MassMutual Life Insurance Co., Career Agent
- 06/2001 – 04/2012, Steve and Company Productions, DJ

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner) ®: CFP® certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP Board. They must pass a comprehensive 2-day, 10-hour CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

Item 3: Disciplinary Information

No management person at HFM Investment Advisors, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Jason F. Gabrieli is not involved with outside business activities.

Item 5: Additional Compensation

Jason F. Gabrieli does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through HFM.

Item 6: Supervision

As the Chief Compliance Officer of HFM, Jason F. Gabrieli supervises all duties and activities of the firm. Jason F. Gabrieli's contact information is on the cover page of this disclosure document. Jason F. Gabrieli adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

HFM Investment Advisors, LLC

209 Rowan Blvd
Glassboro, NJ 08028
(856) 232-2270
www.hfmadvisors.com

Form ADV Part 2B – Brochure Supplement

For

Catherine B. Allen-Carlozo, CFP®, RICP®

Financial Advisor

This brochure supplement provides information about Catherine B. Allen-Carlozo that supplements the HFM Investment Advisors, LLC (“HFM”) brochure. A copy of that brochure precedes this supplement. Please contact Catherine B. Allen-Carlozo if the HFM brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Catherine B. Allen-Carlozo is available on the SEC’s website at www.advisorinfo.sec.gov which can be found using the identification number 1518104.

Item 2: Educational Background and Business Experience

Catherine B. Allen-Carlozo, CFP®, RICP®

Born: 1961

Educational Background

- 1989 – Bachelor of Science, Finance, Rider University

Business Experience

- 10/2018 – Present, HFM Investment Advisors, LLC, Investor Coach
- 09/2010 – 10/2018, M Financial Planning Services, Inc, Investment Advisor Representative
- 09/2009 – 10/2018, LPL Financial, Registered Representative

Professional Designations, Licensing & Exams

CFP® (CERTIFIED FINANCIAL PLANNER™): CFP® certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a comprehensive course of study approved by CFP Board. They must pass a comprehensive 2-day, 10-hour CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

RICP® (Retirement Income Certified Professional): Offered by the American College in Bryn Mawr, Pa., the RICP® is an advanced designation for individuals working in the retirement income planning field. Candidates for the RICP® designation must complete a minimum of three college-level courses and are required to pass a series of two-hour proctored exams. They must also have three years of experience, meet stringent ethics requirements, and participate in The College's continuing education program. The rigorous three-course credential helps advisors master retirement income planning, a key focus area not fully covered in other professional designation programs.

Item 3: Disciplinary Information

No management person at HFM Investment Advisors, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Catherine B. Allen-Carlozo is not involved with outside business activities.

Item 5: Additional Compensation

Catherine B. Allen-Carlozo does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through HFM.

Item 6: Supervision

As a representative of HFM, Catherine B. Allen-Carlozo works closely with the supervisor, Jason F. Gabrieli, and all advice provided to clients is reviewed by the supervisor prior to implementation. Catherine B. Allen-Carlozo adheres to applicable regulations regarding the activities of an Investment Adviser Representative, together with all policies and procedures outlined in the firm's code of ethics and compliance manual. Jason F. Gabrieli's phone number is 856-232-2270.