

Item 1: Cover Sheet

**FORM ADV PART 2A
INFORMATIONAL BROCHURE**



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February 1, 2021

This brochure provides information about the qualifications and business practices of Hart & Patterson Financial Group LLP. If you have any questions about the contents of this brochure, please contact us at 413.253.9454. 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. Our registration does not imply a certain level of skill or training.

Additional information about Hart & Patterson Financial Group LLP (CRD# 310639) is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Statement of Material Changes

In this Item it is required to discuss any material changes which have been made to the brochure. As this is the first issuance of the brochure, there are no material changes to report.

Item 3: Table of Contents

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INFORMATIONAL BROCHURE
HART & PATTERSON FINANCIAL GROUP LLP

Item 4: Advisory Business

Hart & Patterson Financial Group LLP (“HPFG”) is registered with the Securities and Exchange Commission (“SEC”) as an independent registered investment advisor since January, 2021. The company was formed in April 1992 as Hart & Patterson Financial Services, LLC and changed its name to Hart & Patterson Financial Group in January, 2014. Owned by managing members Sue Patterson and Vikki Lenhart, HPFG provides personalized financial planning and investment management services to individuals, families, charitable organizations, and foundations. As a fiduciary, HPFG takes a proactive approach to financial planning which aims to ensure clients receive customized strategic advice from a trusted partner. We regularly collaborate with other advisors, such as a client’s CPA and attorney in our team-based approach.

HPFG’s comprehensive planning process starts with the development of a financial plan which is based on a client’s financial goals and objectives. The plan becomes a working document, to help make financial decisions. It will be used for investment purposes where we will recommend specific strategies to help match each of the client’s goals. As financial circumstances evolve over time, the financial plan is updated. .

When we perform asset management services, it is typically on a discretionary basis. This means that while we will continue an ongoing relationship with each client, we will not seek specific approval of changes to client accounts. Because we take discretion when managing accounts, clients engaging us will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Advisory Agreement that outlines the responsibilities of both the client and HPFG.

In very limited circumstances, we may provide asset management services on a non-discretionary basis, which means we will consult with the client prior to implementing any investment recommendation. Clients should be aware that some recommendations may be time-sensitive, in which case recommendations are not implemented because we are unable to reach a non-discretionary client. Therefore a client’s account may not perform as well as it would have had HPFG been able to reach the client for a consultation on the recommendation.

Financial Planning

In some circumstances, financial planning is available on a stand-alone basis. HPFG’s planning process begins with a discovery meeting to review a client’s financial details, understand their questions and concerns, and explore short and long term financial goals. After the discovery meeting, the HPFG team reviews the information and builds a draft plan. HPFG presents the draft plan and works in a collaborative process with the client to finalize the plan. Depending on the plan complexity, this stage may involve multiple meetings. The objective of the financial planning process is to assess a client’s overall financial well-being, identify any opportunities or risks in the plan, review various scenarios, and implement the agreed upon strategies and actions. The process provides a blueprint for a continued team effort to manage the ongoing plan execution.

Assets Under Management

As of the date of this brochure, HPFG has \$238,758,762.80 in assets under management across 573 accounts, all of which are managed on a discretionary basis.

Item 5: Fees and Compensation

A. Fees Charged

Financial Planning

There is a one-time expense for the development of the financial plan. This fixed fee will vary, but generally ranges from \$1,500 to \$4,000. However, this fee is a guideline, subject to change according to the complexity of the plan and the specific client's circumstances. The cost of updates to financial plans is included in the investment advisory fee below.

Investment Advisory Fees

The typical billing schedule for Investment Advisory Services is as follows:

| | |
|-----------------------|-------|
| \$0- \$500,000 | 1.25% |
| \$500,000-\$1,000,000 | 1.10% |
| Next \$2,000,000 | 0.9% |
| Next \$2,000,000 | 0.75% |
| Next \$2,500,000 | 0.65% |
| \$7,500,000 and up | 0.50% |

HPFG investment advisory fees range from 0.50% to 1.75% per annum of the market value of a client's account managed by HPFG, as shown in the tiered fee schedule above. Fees are negotiable and may be higher or lower than this range, based on the nature of the account, and the origin of the client. Factors affecting fee percentages include the size of the account, and any other unique factors that may exist. All clients, but especially those with smaller accounts, should be advised they may receive similar services from other professionals for higher or lower overall costs. Clients whose assets are managed by a third party manager will incur fees related to that manager.

B. Fee Payment

Financial Planning: Financial planning fees will be due upon receipt of the invoice.

Asset Management:

For clients whose assets are managed by the firm, investment advisory fees will be debited directly from each client's account. The advisory fee is paid quarterly, in arrears, and the value used for the fee calculation is the market value as of the last market day of the previous quarter, including any

cash in the client's account. For example, if your annual fee is 1.00%, each quarter the value of your account will be multiplied by 1.00%, then divided by four to determine our quarterly fee. To the extent there is cash in your account, it will be included in the value for the purpose of calculating fees. Once the calculation is made, your account custodian will deduct the fee from your account and remit it to HPFG.

Each quarter, the client will receive a statement from their account custodian showing all transactions in their account, including the fee. HPFG encourages clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on reports prepared by HPFG against the information in the statements provided directly from the custodian. Please alert HPFG of any discrepancies.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian.

C. Other Fees

There are a number of other fees that can be associated with holding and investing in securities. You may be responsible for fees including transaction fees for the purchase or sale of a mutual fund or Exchange Traded Fund, or the purchase or sale of a stock.

Expenses of a fund will not be included in investment advisory fees, as they are deducted from the value of the shares by the mutual fund manager. For a complete description of expenses related to each fund, you should read a copy of the prospectus issued by that fund. HPFG can provide or direct you to a copy of the prospectus for any fund that we recommend to you. In regards to mutual fund strategies managed by third party managers, the third party manager may be compensated from the expense ratio of specific mutual funds, or they may they receive managed account fees, both in addition to investment advisory fees. Please see Item 8 below for more information on third party managers, and HPFG will adequately disclose all third party manager fees at the onset of each relationship.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

D. *Pro-rata* Fees

If a client becomes a client during a quarter, they will pay a management fee for the number of days left in that quarter. If clients terminate the relationship during a quarter, they are only billed on the number of days that they were an active client. Once the relationship terminates, HPFG will cease to perform services, including processing trades and distributions. For financial planning services, if the client terminates the relationship prior to the plan being delivered, the client will still receive all work that had been performed up until that point. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be "de-linked", meaning they will no longer be visible to HPFG.

E. Compensation for the Sale of Securities.

As further discussed in Item 10 below, certain HPFG personnel will also maintain an affiliation with a broker-dealer as supervised Registered Representatives for purposes of servicing existing securities and variable annuities. In these roles, they accept compensation for servicing existing investments

already owned by HPFG clients; however HPFG no longer opens new commission-based accounts nor sells commission-based life or long term care insurance.

If supervised registered representatives were to open a new commission-based account, they could accept compensation for the sale of these investment products, including asset-based sales charges, variable annuity commissions, or service fees from the sale of mutual funds. This may present a conflict of interest and/or give the supervised person an incentive to recommend products based on the compensation or commission received rather than on the client's needs. If a commissionable recommendation were to be made to a client, HPFG will document the suitability of the recommendation, as it pertains to a conflict of interest, in the client file and inform the client of the potential conflict of interest by providing a copy of the documentation. Clients always have the option to purchase any HPFG recommended solutions through registered representatives or insurance agents who are not affiliated with HPFG. As further discussed in Item 10 below, certain HPFG personnel are registered representatives of a broker-dealer and/or insurance agents. In these roles, they accept compensation for the servicing investment products for HPFG clients. Advisory fees that are charged to clients are not reduced to offset the commissions or markups on investment products recommended to clients.

Certain HPFG personnel are registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"), a FINRA member broker-dealer. The relationship with PKS allows these professionals to provide additional products to clients' portfolios that would not otherwise be available. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with HPFG or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the sales of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to HPFG.

Receipt of commissions for investment products that are recommended to clients gives rise to a conflict of interest for the representative, in that the individual who will receive the commissions is also the individual that is recommending that the client purchase a given product. This conflict is disclosed to clients verbally and in this brochure. Clients are advised that they may choose to implement any investment recommendation through another broker-dealer that is not affiliated with HPFG. HPFG attempts to mitigate this conflict by requiring that all investment recommendations have a sound basis for the recommendation, and by requiring employees to acknowledge their fiduciary responsibility toward each client.

Item 6: Performance-Based Fees

HPFG will not charge performance based fees.

Item 7: Types of Clients

Clients advised may include individuals, families, trusts, charitable organizations and foundations. HPFG's investment minimum is \$1,000,000 and may be waived at the discretion of HPFG.

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

It is important for you to know and remember that all investments carry risks. **Investing in securities involves risk of loss that clients should be prepared to bear.**

Each client's portfolio will be invested according to that client's investment objectives, which are ascertained through the financial planning process or through a review of the existing plan. Once we ascertain your objectives for each account, we will develop a set of asset allocation guidelines that will aide in executing the proper allocation strategy. Using fundamental analysis, we base our conclusions on predominantly publicly available research, such as regulatory filings, press releases, competitor analyses, and in some cases research we receive from our custodian or other market analyses.

The investment programs are not investment products. Clients may have different needs than others within the same investment program. Accordingly, not all clients in each investment program will have the exact same percentages of each underlying investment.

The investment strategies that we recommend are based on the needs of the client as compared with the typical behavior of that security type or manager, current market conditions, the client's current financial situation (including assets that may be managed by another advisor), financial goals, and the timeline to meet those goals. Because we develop an investment strategy based on your personal situation and financial goals, your asset allocation guidelines may be similar to or different from another client.

We may periodically recommend changes to the investment strategies and client portfolios to meet the guidelines of the asset allocation for the program or an individual client's objectives. It is important to remember that because market conditions can vary greatly, your asset allocation guidelines are not necessarily strict rules. Rather, we review accounts individually, and may deviate from the guidelines as we believe necessary.

When HPFG or the third party manager makes changes to an investment strategy, these changes may not be made simultaneously. Rather, some accounts may be modified before others. This may result in accounts being traded earlier inadvertently having an advantage over accounts traded later.

Additionally, part of the HPFG process includes, where appropriate, involving multiple generations in order to facilitate family financial planning. This can increase the financial education of the later generations and manage expectations. However, potential for conflicts of interest exist with the exchange of intergenerational information. HPFG attempts to minimize these conflicts by treating each household as its own fiduciary relationship. Information can only be shared across generations with each household's consent.

Third Party Managers

HPFG utilizes managers to assist in the management of client assets. HPFG's primary investment management and custodial relationship is with SEI Private Trust Company and SEI Investments Management Company ("SIMC"), a federally registered investment advisor. SEI Investments Management Company and SEI Private Trust Company and its affiliates are collectively referred to in this document as "SEI". SEI includes the investment advisory firm SEI Investments Management Corporation (CRD#105146) ("SIMC") and the broker-dealer SEI Investments Distributions Co. (CRD#10690). These managers are selected after a process whereby our custodian SEI Private Trust Company (SEI) evaluates each manager's investment performance, operations, and offerings. All third party managers are sourced through SEI. This process continues on an ongoing basis, throughout the time the client works with the third party manager. It is important to remember that any fees paid to these managers are separate from, and in addition to, fees paid to HPFG. To the degree that clients' assets are invested with SEI, HPFG will review SEI documents for information on all fees payable to SEI.

Risk of Loss

There are always risks to investing. **Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear.** It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading:** Clients should note that short-term trading transactions may occur. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. HPFG endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.
- **Financial Risk.** The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings

provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.

- **Short Sales.** “Short sales” are a way to implement a trade in a security that may feel overvalued. In a “long” trade, the investor is hoping the security increases in price. Thus in a long trade, the amount of the investor’s loss (without margin) is the amount paid for the security. In a short sale, the investor is hoping the security decreases in price. However, unlike a long trade where the price of the security can only go from the purchase price to zero, in a short sale, the price of the security can go infinitely upwards. Thus in a short sale, the potential for loss is unlimited and unknown, where the potential for loss in a long trade is limited and knowable. HPFG rarely utilizes short sales, only when the client’s risk tolerances permit.

- **Risks specific to private placements, sub-advisors and other managers.** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ.

- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.

- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company’s future. For example, a company’s management may lack experience, or the company’s capital for growth may be restricted. These small companies also tend to trade less frequently than larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.

- **Concentration Risk.** While HPFG or the investment manager selects individual securities, including mutual funds, for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client’s equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client’s equity portfolio may be affected negatively, including significant losses.

- **Transition risk.** As assets are transitioned from a client’s prior advisers to HPFG, there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by HPFG. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client’s holdings into recommendations of HPFG may adversely affect the client’s account values, as HPFG’s recommendations may not be able to be fully implemented.

- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of

their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.

- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

Item 9: Disciplinary Information

There are no disciplinary items to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-dealer

To permit HPFG clients to have access to as many investment solutions as possible, certain professionals of HPFG are registered representatives of Purshe Kaplan Sterling Investments, Inc. (“PKS”), a FINRA member broker-dealer. The relationship with PKS allows these professionals to service investments in clients’ portfolios that would not otherwise be serviceable. Because PKS supervises the activities of these professionals as registered representatives of PKS, the relationship may be deemed material. However, PKS is not affiliated with HPFG or considered a related party. PKS does not make investment decisions for client accounts. Registered representative status enables these professionals to receive customary commissions for the servicing of various securities, including those recommended to clients. Commissions charged for these products will not offset management fees owed to HPFG.

B. Futures Commission Merchant/Commodity Trading Advisor

Neither the principal of HPFG, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

This item is not applicable.

D. Recommendations of Other Advisers

As discussed in Item 8, HPFG may recommend the use of one or more third party managers.

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

- A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.
- B. Not applicable. HPFG does not recommend to clients that they invest in any security in which HPFG or any principal thereof has any financial interest.
- C. On occasion, an employee of HPFG may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades are reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.
- D. On occasion, an employee of HPFG may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades are reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

Item 12: Brokerage Practices

- A. Recommendation of Broker-Dealer

HPFG does not maintain custody of client assets; though HPFG may be deemed to have custody if a client grants HPFG authority to debit fees directly from their account (see Item 15 below). Assets will be held with a qualified custodian, which is typically a bank or broker-dealer. HPFG generally uses the brokerage and clearing services of SEI Private Trust Company (SEI). Factors which HPFG considers in recommending SEI or any other brokerage firm to clients include their financial strength, reputation, execution, pricing, research and service. Use of SEI enables HPFG to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The transaction fees charged by SEI may be higher or lower than those charged by other financial institutions. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, and responsiveness. HPFG seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

- B. Aggregating Trades

Transaction costs per client may be lower on a particular trade if all clients in whose accounts the

trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, executed one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence (For example, if a *pro rata* division would result in a client receiving a fraction of a share, or a position in the account of less than 1%.)

Directed Brokerage

HPFG allows clients to direct brokerage. “Directing” brokerage means choosing to maintain all or some of their assets with a broker-dealer that is not recommended by HPFG. HPFG may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients’ money because without the ability to direct brokerage HPFG may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their clients to direct brokerage.

Item 13: Review of Accounts

All accounts and corresponding financial plans will be managed on an ongoing basis, with formal reviews with the client on at least an annual basis. However, it is expected that market conditions, changes in a particular client’s account, or changes to a client’s circumstances will trigger a review of accounts.

The annual report in writing is intended to review asset allocation. All clients will receive statements and confirmations of trades directly from the custodian. Please refer to Item 15 regarding Custody.

Item 14: Client Referrals and Other Compensation

A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.

Please refer to Item 12, where we discuss recommendation of Broker-Dealers.

B. Compensation to Non-Advisory Personnel for Client Referrals.

HPFG does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

There are two avenues through which HPFG has custody of client funds; by directly debiting its fees from client accounts pursuant to applicable agreements granting such right, and potentially by permitting clients to sign standing letters of authorization (“SLOAs”). SLOAs permit a client to sign one document that directs HPFG to make distributions out of the client’s account(s).

Clients will receive statements directly from the custodian and copies of all trade confirmations directly from the custodian

Clients whose fees are directly debited from a qualified custodian chosen by the client will provide written authorization to debit advisory fees from their accounts. Each quarter, the client will receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on reports prepared by HPFG against the information in the statements provided directly from SEI. Please alert us of any discrepancies.

In addition to the account custodian's custody procedures, clients signing SLOAs will be requested to confirm that the accounts to which funds are distributed are parties unrelated to HPFG.

Item 16: Investment Discretion

When HPFG is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, SEI will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You may receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive statements at least quarterly from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Advisory Agreement that outlines the responsibilities of both the client and HPFG.

Item 17: Voting Client Securities

Copies of our Proxy Voting Policies are available upon request. From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. HPFG will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. HPFG will not give clients advice on how to vote proxies.

Item 18: Financial Information

HPFG does not require the prepayment of fees of \$1,200 or more, more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

There are no material financial circumstances or conditions that would reasonably be expected to impair the ability to meet contractual obligations to clients.