

Hatton Investments, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 17, 2023

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Hatton Investments, LLC (“Hatton Investments” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (305) 876-6903.

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

Additional information about Hatton Investments and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 319143.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Hatton Investments. For convenience, the Advisor has combined these documents into a single disclosure document.

Hatton Investments believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Hatton Investments encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes made to this Disclosure Brochure since the last filing and distribution to Clients.

Future Changes

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

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 319143. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (305) 876-6903.

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Item 4 – Advisory Services

A. Firm Information

Hatton Investments, LLC (“Hatton Investments” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Georgia. Hatton Investments was founded in February 2022. Hatton Investments is owned and operated by Brandon T. Hatton (Principal and Chief Compliance Officer).

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Hatton Investments.

Hatton Investments also offers advisory services through the brand name Conscious Wealth® Management. The trade name and logo are used for marketing purposes and may appear on marketing materials or Client statements. However, advisory services are provided through Hatton Investments.

B. Advisory Services Offered

Hatton Investments offers advisory services to individuals, high net worth individuals, families, trusts, estates, and small businesses (each referred to as a “Client”).

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

Wealth Management Services

Hatton Investments provides customized wealth management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary wealth management and related advisory services. Hatton Investments works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to design a portfolio strategy. Hatton Investments will typically construct investment portfolios utilizing individual equities, exchange-traded funds (“ETFs”), and individual bonds to achieve the Client’s investment goals. The Advisor may also utilize mutual funds, options, private equity, venture capital, real estate investment trusts (“REITs”), closed-end funds, and/or other types of investments, as appropriate, to meet the needs of the Client. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Hatton Investments will select, recommend and/or retain mutual funds on a fund-by-fund basis. Due to specific custodial and/or mutual fund company constraints, material tax considerations, and/or systematic investment plans, Hatton Investments will select, recommend and/or retain mutual fund share classes that do not have trading costs when possible. These will, in most cases, be institutional share classes but, in some cases, maybe share classes with higher internal expense ratios than institutional share classes. Hatton Investments will seek to select the lowest cost share class available that is in the best interest of each Client, weighing the expected investment pattern, expense ratios, and potential ticket charges, and will ensure the selection aligns with the Client’s financial objectives and stated investment guidelines.

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

Hatton Investments evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Hatton Investments may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Hatton Investments may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against the market movement. Hatton Investments may recommend selling positions for reasons that include but are not limited to harvesting capital gains or losses, business or sector risk exposure to a specific security or class of

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securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Financial Planning Services

Hatton Investments will typically provide a variety of financial planning and consulting services to Clients. Service may be offered as part of an overall wealth management engagement or contracted separately. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, and establish education savings and/or charitable giving programs.

If there is a Client need, Hatton Investments will refer the Client to an accountant, attorney, or other specialist[s], as appropriate for the Client's unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For project-based or ad-hoc engagements, the Advisor does not provide a formal written summary. Project-based financial plans or consultations are typically completed within six (6) months of the contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for wealth management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

C. Client Account Management

Prior to engaging Hatton Investments to provide advisory services, each Client is required to enter into a written advisory agreement with the Advisor that defines the terms, conditions, authority, and responsibilities of the Advisor and the Client. These services may include:

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

D. Wrap Fee Programs

Hatton Investments does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Hatton Investments.

E. Assets Under Management

As of December 31, 2022, Hatton Investments manages \$162,355,432 in Client assets, of which \$143,643,685 are managed on a discretionary basis and \$18,711,747 on a non-discretionary basis. The Advisor also advises upon additional assets for its Clients. Clients may request more current information at any time by contacting the Advisor.

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Item 5 – Fees and Compensation

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

A. Fees for Advisory Services

Wealth Management Services

Wealth management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Fees generally range up to 1.00% annually based on several factors, including the scope and complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions, and other complexities may be charged a higher fee.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Advisor typically offers a tiered, incremental fee schedule (as detailed above) where the rate is reduced as assets under management increase. In certain circumstances, the Advisor may charge a fixed annual rate or fixed fee for its services. The Client's fees will take into consideration the aggregate assets under management with the Advisor across all accounts unless otherwise agreed in writing. All securities held in accounts managed by Hatton Investments will be independently valued by the Custodian. Hatton Investments will conduct periodic reviews of the Custodian's valuations.

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

Financial Planning Services

Financial planning services may be included as part of an overall wealth management engagement and fee or contracted separately. Hatton Investments offers standalone financial planning services either on an hourly basis or for a fixed engagement fee. Hourly fees range up to \$ 300 per hour. Fixed fee engagements are negotiated based on the expected number of hours to complete the engagement as the Advisor's hourly rate. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

B. Fee Billing

Wealth Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] in advance of each calendar quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the market value of assets under management as of the end of the prior calendar quarter. Clients will be provided with a statement, generally monthly, but at least quarterly, from the Custodian reflecting the deduction of the wealth management fee. Clients provide written authorization permitting advisory fees to be deducted by Hatton Investments to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

Financial Planning Services

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

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Hatton Investments, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by Hatton Investments are separate and distinct from these custody and execution fees.

In addition, all fees paid to Hatton Investments for wealth management services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Hatton Investments but would not receive the services provided by Hatton Investments, which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Hatton Investments to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information. Additionally, as noted above, the Advisor will select share classes that do not have trading costs when possible. These will, in most cases, be institutional share classes but, in some cases, maybe share classes with higher internal expense ratios than institutional share classes. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Wealth Management Services

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

Financial Planning Services

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

E. Compensation for Sales of Securities

Hatton Investments does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account other than the wealth management fees noted above.

Insurance Agency Affiliations

Certain Advisory Persons are also licensed as independent insurance professionals. As an independent insurance professional, an Advisory Person will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients of the Advisor. Insurance commissions earned by Advisory Persons are separate and in addition to advisory fees. This practice presents a conflict of interest as the Advisory Person has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on the Client's needs. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor. Please see item 10 below.

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

Hatton Investments does not charge performance-based fees for its wealth management services. The fees charged by Hatton Investments are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client. Hatton Investments does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Hatton Investments offers advisory services to individuals, high net-worth individuals, families, trusts, estates, and small businesses. Hatton Investments generally requires a minimum relationship size of \$500,000, which may be reduced at its sole discretion.

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

A. Methods of Analysis

Hatton Investments employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Hatton Investments are derived from numerous sources, including financial media companies, third-party research materials, professional data subscriptions, Internet sources, and reviews of company activities, including annual reports, prospectuses, press releases, and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria generally consists of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts. *Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that Hatton Investments will be able to predict such a reoccurrence accurately.

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

B. Risk of Loss

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

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

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client

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participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals, or other factors that may affect this analysis.

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

Market Risks

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

ETF Risks

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

Bond ETF Risks

Bond ETFs are subject to specific risks, including the following: (1) interest rate risks, i.e., the risk that bond prices will fall if interest rates rise, and vice versa; the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e., the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e., the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e., the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e., the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e., the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

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

Closed-End Fund Risks

Closed-end funds typically use a high degree of leverage. They may be diversified or non-diversified. Risks associated with closed-end fund investments include liquidity risk, credit risk, volatility, and the risk of magnified losses resulting from the use of leverage. Additionally, closed-end funds may trade below their net asset value.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Clients should only have a portion of their assets in these investments.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Options contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call," pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Real Estate Investment Trusts ("REITs")

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

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

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving Hatton Investments or its management persons. Hatton Investments values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 319143.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with Hatton Investments. As an insurance professional, an Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest in recommending certain products of insurance companies. Clients are under no obligation to implement any recommendations made by an Advisory Person or the Advisor.

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

A. Code of Ethics

Hatton Investments has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Hatton Investments ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Hatton Investments and its Supervised Persons owe a duty of loyalty, fairness, and good faith toward each Client. It is the obligation of Hatton Investments' Supervised Persons to adhere not only to the specific provisions of the Code but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (305) 876-6903.

B. Personal Trading with Material Interest

Hatton Investments allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Hatton Investments does not act as a principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. Hatton Investments does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Hatton Investments allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to

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Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls), gifts and entertainment, outside business activities, and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades or by trading based on material non-public information. This risk is mitigated by Hatton Investments requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

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

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Hatton Investments does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Hatton Investments to direct trades to the Custodian as agreed upon in the wealth management agreement. Further, Hatton Investments does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Hatton Investments does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Hatton Investments. However, if the recommended Custodian is not engaged, the Advisor may be limited in the services. Hatton Investments may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices. Hatton Investments will generally recommend that Clients establish their account[s] at Raymond James & Associates, Inc. ("Raymond James"). Raymond James is a FINRA-registered broker-dealer and New York Stock Exchange/SIPC member. Raymond James will serve as the Client's "qualified custodian." Hatton Investments maintains institutional relationships with Raymond James, whereby the Advisor receives economic benefits from the Custodian. Please see Item 14 below. Following are additional details regarding the brokerage practices of the Advisor:

Hatton Investments has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. Access to the Raymond James platform is provided at no charge to the Advisor. The Raymond James platform includes brokerage, custody, administrative support, record keeping, technology, and related services designed to support registered investment advisors like Hatton Investments in serving Clients. These services are intended to serve the best interests of the Advisor's Clients.

Raymond James may charge securities transaction fees for effecting certain securities transactions. Raymond James enables the Advisor to obtain certain no-load mutual funds without securities transaction fees and other no-load funds at nominal transaction charges. Raymond James's transaction fee rates are generally considered discounted from customary retail brokerage rates. However, the transaction fees charged by Raymond James may be higher or lower than those charged by other custodians and broker-dealers. Please see Item 14 below for additional information.

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

- 1. Soft Dollars** – Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Hatton Investments does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

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

A Client may pay a commission that is higher than another qualified custodian might charge to effect the same transaction. The Advisor has determined in good faith that the commissions charged by Raymond James are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not necessarily the lowest possible cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of the Custodian’s services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although the Advisor will seek competitive rates to the benefit of all Clients, it may not necessarily obtain the lowest possible commission rates for specific Client account transactions. Although the investment research products and services that may be obtained by the Advisor will generally be used to service all of the Advisor’s Clients, they may not equally benefit all Clients. Please also see Item 14.

B. Aggregating and Allocating Trades

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

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Hatton Investments and periodically by the CCO. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

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

C. Review Reports

The Client will receive brokerage statements generally monthly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Hatton Investments

Hatton Investments is a fee-based advisory firm that is compensated solely by its Clients and not from any investment product. Hatton Investments does not receive commissions or other compensation from product sponsors, broker-dealers, or any unrelated third party. Hatton Investments may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Hatton Investments may receive non-compensated referrals of new Clients from various third parties.

Participation in the Institutional Advisor Platform

As noted in item 12, Hatton Investments has established an institutional relationship with Raymond James to assist the Advisor in managing Client account[s]. As part of the arrangement, Raymond James also makes available to the Advisor, at no additional charge to the Advisor, certain research and brokerage services, including research services obtained by Raymond James directly from independent research companies. The Advisor may also receive additional services and support from Raymond James. As a result of receiving such services for no additional cost, the Advisor may have an incentive to continue to use or expand the use of Raymond James's services. The Advisor examined this potential conflict of interest when it chose to enter into the relationship with Raymond James and has determined that the relationship is in the best interests of the Advisor's Clients and satisfies its Client obligations, including its duty to seek best execution. Please see Item 12 above. The Advisor receives access to software and related support without cost because the Advisor renders wealth management services to Clients that maintain assets at Raymond James. The software and related systems support may benefit the Advisor but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services. In addition, Raymond James has provided the Advisor with financial support in the launch of the Advisor and reimbursements for various third-party service providers.

B. Compensation for Client Referrals

Hatton Investments does not compensate, either directly or indirectly, any persons who are not supervised persons for Client referrals.

Item 15 – Custody

All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct Hatton Investments to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare them to any reports provided by Hatton Investments to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

Item 16 – Investment Discretion

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

Item 17 – Voting Client Securities

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

Item 18 – Financial Information

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

Form ADV Part 2B – Brochure Supplement

for

**Brandon T. Hatton, CAP[®], CRPC[®]
Principal and Chief Compliance Officer**

Effective: March 17, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Brandon T. Hatton CAP[®], CRPC[®] (CRD# 5603947), in addition to the information contained in the Hatton Investments, LLC (“Hatton Investments” or the “Advisor,” CRD# 319143) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Hatton Investments Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (305) 876-6903.

Additional information about Mr. Hatton is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or individual CRD# 5603947.

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Item 2 – Educational Background and Business Experience

Brandon T. Hatton, CAP®, CRPC®, born in 1975, is dedicated to advising Clients of Hatton Investments as its Principal and Chief Compliance Officer. Mr. Hatton earned a Bachelor of Science degree in Social Science Education from Miami University of Ohio in 1997. Additional information regarding Mr. Hatton's employment history is included below.

Employment History:

Principal and Chief Compliance Officer, Hatton Investments, LLC	05/2022 to Present
Owner, Dropping Keys, LLC	09/2019 to Present
Financial Advisor, Raymond James, and Associates, Inc.	05/2018 to 06/2022
Financial Advisor, Merrill Lynch, Pierce, Fenner & Smith Incorporated	08/2009 to 05/2018

Chartered Advisor in Philanthropy™ (“CAP®”)

The Chartered Advisor in Philanthropy™ (CAP®) provides you with the knowledge and tools you need to help clients articulate and advance their highest aspirations for self, family, and society. Candidates must be engaged in the following professional activities for three of the five years immediately preceding the application:

- Advising individuals or charitable organizations in wealth and estate planning, charitable planning, charitable giving, planned giving, nonprofit or foundation management or services, investment management of charitable assets or accounting or;
- Employed in the nonprofit sector in a capacity related to nonprofit management, development, planned giving, or fundraising.

The CAP® program is offered by the American College and consists of three graduate-level courses, *Planning for Impact in the Context of Family Wealth*, *Charitable Strategies*, and *Gift Planning in a Nonprofit Context*. The CAP® program requires three course-specific, two hours proctored exams and 15 hours of continuing education every two years. Holders of the CAP® must adhere to The American College's Code of Ethics.

Chartered Retirement Planning Counselor™ (“CRPC®”)

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning, and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct, and complying with self-disclosure requirements.

Item 3 – Disciplinary Information

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

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

However, the Advisor encourages Clients to independently view the background of Mr. Hatton on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or individual CRD# 5603947.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Hatton is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Hatton's role with Hatton Investments. As an insurance professional, Mr. Hatton will receive

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customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Hatton is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Hatton or the Advisor. Mr. Hatton spends less than 10% of his time per month in this capacity.

Dropping Keys, LLC

Mr. Hatton is also the Owner of Dropping Keys, LLC ("Dropping Keys"), an entity created for authorship and speaking fees. Mr. Hatton spends between two and ten hours per month on this activity.

Lake Effect Properties, LLC

Mr. Hatton is also the Owner of Lake Effect Properties, LLC ("Lake Effect Properties"), an entity established for his ownership of various rental properties. Mr. Hatton spends approximately one hour per month on this activity.

Item 5 – Additional Compensation

Mr. Hatton has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Hatton serves as the Principal and Chief Compliance Officer of Hatton Investments. Mr. Hatton can be reached at (305) 876-6903.

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

Form ADV Part 2B – Brochure Supplement

for

**Rachel M. Molina
Investment Advisor Representative**

Effective: March 17, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Rachel M. Molina (CRD# 6948048), in addition to the information contained in the Hatton Investments, LLC (“Hatton Investments” or the “Advisor,” CRD# 319143) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Hatton Investments Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (305) 876-6903.

Additional information about Ms. Molina is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or individual CRD# 6948048.

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Item 2 – Educational Background and Business Experience

Rachel M. Molina, born in 1997, is dedicated to advising Clients of Hatton Investments as an Investment Advisor Representative. Ms. Molina earned a Bachelor of Science and Bachelor of Arts degree in Finance from the Georgia Institute of Technology in 2018. Additional information regarding Ms. Molina's employment history is included below.

Employment History:

Investment Advisor Representative, Hatton Investments, LLC	01/2023 to Present
Investment Advisor Representative, Capital Investment Advisory Services, LLC	07/2022 to 12/2022
Branch Office Staff, Capital Investment Group, Inc.	06/2022 to 12/2022
Client Service Associate, Paces Ferry Wealth Advisors, LLC	07/2019 to 06/2021
Trading Intern, Diakoneo Capital Management	08/2018 to 12/2018
Summer Intern, Integrity Investment Management	05/2018 to 08/2018
Welder, Meyn America	05/2015 to 12/2016

Item 3 – Disciplinary Information

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

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

However, the Advisor encourages Clients to independently view the background of Ms. Molina on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or individual CRD# 6948048.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Molina is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Ms. Molina's role with Hatton Investments. As an insurance professional, Ms. Molina will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Molina is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Molina or the Advisor. Ms. Molina spends approximately ten percent (10%) of her time per month in this capacity.

Molina Property Group, LLC

Ms. Molina is the Co-owner of Molina Property Group, LLC ("Molina Property Group"). Ms. Molina's role with Molina Property Group is buying, renting, and flipping houses. Ms. Molina occasionally helps with the renovations. Ms. Molina spends approximately ten percent (10%) of her time per month in this capacity.

Item 5 – Additional Compensation

Ms. Molina has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Molina serves as an Investment Advisor Representative of Conscious Wealth® Management d/b/a Hatton Investments and is supervised by Brandon Hatton, the Chief Compliance Officer. Mr. Hatton can be reached at (305) 876-6903.

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

Form ADV Part 2B – Brochure Supplement

for

**John P. Foster
Client Service Associate**

Effective: March 17, 2023

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of John P. Foster (CRD# 7316521) in addition to the information contained in the Hatton Investments, LLC (“Hatton Investments” or the “Advisor,” CRD# 319143) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Hatton Investments Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (305) 876-6903.

Additional information about Mr. Foster is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or individual CRD# 7316521.

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Item 2 – Educational Background and Business Experience

John P. Foster, born in 1995, is dedicated to advising Clients of Hatton Investments as a Client Service Associate. Mr. Foster earned a Bachelor of Science degree in Political Science from Kennesaw State University in 2017. Additional information regarding Mr. Foster's employment history is included below.

Employment History:

Client Service Associate, Hatton Investments, LLC	05/2022 to Present
Financial Advisor, Raymond James, and Associates, Inc.	10/2021 to 06/2022
Financial Analyst, Crown Castle	03/2019 to 12/2021
Project Analyst, Crown Castle	06/2017 to 03/2019
Wait Staff - Part Time, Dunwoody Country Club	05/2011 to 06/2017

Item 3 – Disciplinary Information

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

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

However, the Advisor encourages Clients to independently view the background of Mr. Foster on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or individual CRD# 7316521.

Item 4 – Other Business Activities

Mr. Foster is dedicated to the investment advisory activities of Hatton Investments' Clients. Mr. Foster does not have any other business activities.

Item 5 – Additional Compensation

Mr. Foster is dedicated to the investment advisory activities of Hatton Investments' Clients. Mr. Foster does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Foster serves as a Client Service Associate of Hatton Investments and is supervised by Brandon Hatton, the Chief Compliance Officer. Mr. Hatton can be reached at (305) 876-6903.

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

Privacy Policy

Effective: March 17, 2023

Our Commitment to You

Hatton Investments, LLC ("Hatton Investments" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

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

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

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

Why you need to know?

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

What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address, and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

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

How do we protect your information?

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

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

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How do we share your information?

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

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

State-specific Regulations

California	In response to a California law, to be conservative, we assume that accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

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

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

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (305) 876-6903.