

# **FIRM BROCHURE (Part 2A of Form ADV)**

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**Hazlett Management Group LLC**

1224 Jefferson St. Apt. #5410 Kansas City, MO 64105

[adamhazlettpro@gmail.com](mailto:adamhazlettpro@gmail.com)

612-719-6098

This brochure provides information about the qualifications and business practices of Hazlett Management Group LLC. If you have any questions about the contents of this brochure, please contact us at 612 – 719 – 6098 /or [adamhazlettpro@gmail.com](mailto:adamhazlettpro@gmail.com). 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. Additional information about Hazlett Management Group LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2: Material Changes**

Hazlett Management Group LLC has updated its ADV Part 2A Disclosure Brochure to reflect the following change(s):

1. 3/4/2023: Hazlett Management Group LLC is no longer registered as an internet-based investment advisor and instead is solely registered and an investment advisor in the state of Missouri.
2. 3/4/2023: Hazlett Management Group LLC has changed its fee structure to be a \$3 per month fee billed to the client at the beginning of each month. This is a change from the original fixed rate one-time fee (other than subscription fees) of \$499 per purchase of advisory services internet platform.

Pursuant to SEC Rules, Hazlett Management Group LLC will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of the Firm's fiscal year end, along with a copy of this Brochure or an offer to provide the Brochure.

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## **ITEM 4: Advisory Business**

Hazlett Management Group LLC is a Kansas City, Missouri-based investment management firm founded in 2022. Hazlett Management Group LLC provides advisory services in person, over the phone, through investment newsletters, and online educational seminars aimed at a general audience. Hazlett Management Group LLC does not offer portfolio management or market timing services, and our investment advice is generally limited to stocks, bonds, options, and real estate investment opportunities. Hazlett Management Group LLC is registered with the State of Missouri as a limited liability company (“LLC”). Hazlett Management Group LLC is 100% owned by the firm's Chief Executive Officer, Adam Hazlett. Hazlett Management Group LLC advisory services are tailored to individual clients based on their current and unique life, financial situations, and longer goals. Hazlett Management Group LLC does not provide portfolio management services to any wrap fee programs, as that term is defined in the instructions to Form ADV Part 2.

As of 3/4/2023, Hazlett Management Group LLC manages \$0 of client assets across both discretionary and non-discretionary accounts.

## **ITEM 5: Fees & Compensation**

Hazlett Management Group LLC charges a reoccurring subscription fee of \$3 per month billed to the client on the 1st of each month once signing up for HMG services. Hazlett Management Group LLC will bill clients for fees incurred once the client has been approved and purchased our services. Clients are only able to purchase the service after they have been approved for the purchase of advisory services by Hazlett Management Group LLC. Hazlett Management Group LLC will notify prospective clients if they have been approved to purchase the advisory services once reviewing the initial questionnaire. Clients must pay for access to the advisory services but are eligible for a refund within 60 days if they are not satisfied with the services provided.

Hazlett Management Group LLC receives no compensation in connection with the purchase or sale of securities.

Clients may be required to pay custodian fees and mutual fund expenses in connection with our advisory services. Clients may also incur brokerage and other transaction costs.

Clients have the option to purchase investment products that we recommend through other brokers and agents that are not affiliated with Hazlett Management Group LLC.

## **ITEM 6: Performance-Based Fees and Side-By-Side Management**

Hazlett Management Group LLC does not charge or accept performance-based fees (i.e., fees calculated based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client).

Consequently, Hazlett Management Group LLC does not engage in side-by-side management of accounts that are charged a performance-based fee with accounts that are charged another type of fee (such as fees based on the client's assets under management). As stated above, Hazlett Management Group LLC is not compensated through any fee or fee structure and does not provide any services to any individual or institution.

## **ITEM 7: Types of Clients**

Hazlett Management Group LLC generally provides services to individuals, with a focus on Generation Z or Millennial investors interested in stocks, bonds, options, and real estate investment opportunities and has no minimum account size for opening or maintaining an account.

## **ITEM 8: Methods of Analysis, Investment Strategies and Risk of Loss**

### **A. Methods of Analysis**

In formulating investment advice and managing assets, Hazlett Management Group LLC analyzes economic factors such as the supply of money, various interest rates, and commodity prices to help forecast the future economic environment. This in turn guides the Firm's asset allocation decisions and the selection of investments suitable for particular investment portfolios. Political factors are considered in those areas that impact the overall economic environment.

### **B. Investment Strategies**

Hazlett Management Group LLC investment strategies are based on economic forecast and unique factors such as desired rate of return, aversion to risk, investment time horizon, tax consequences, and other constraints, investments are diversified across different asset classes and investment styles.

### **C. Risk of Loss**

Investing in securities involves a significant risk of loss, and all investments have certain risks that are borne by the investor. Hazlett Management Group LLC's methods of analysis and investment strategies aim to keep the risk of loss in mind.

Some of risks of loss to be aware of include, but are not limited, to the following:

1. **Interest-Rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
2. **Market Risk:** The price of a stock, bond, mutual fund or other security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.
3. **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
4. **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
5. **Political and Legislative Risks:** Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the United States.
6. **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.



7. **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
8. **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
9. **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **ITEM 9: Disciplinary Information**

Registered investment advisers such as Hazlett Management Group LLC are required to disclose all material facts regarding any legal or disciplinary event that would be material to a client's or prospective client's evaluation of the Firm or the integrity of its management. Hazlett Management Group LLC has not been subject to any such legal or disciplinary event, and thus has no information to disclose with respect to this Item.

## **ITEM 10: Other Financial Industry Activities and Affiliations**

Hazlett Management Group LLC is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor. The Firm does not have any affiliation with any related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships. Hazlett Management Group LLC does not receive compensation directly or indirectly from other advisers that creates a material conflict of interest, nor does it have other business relationships with advisers that would create a material conflict of interest.

## **ITEM 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Hazlett Management Group LLC will provide a copy of our code of ethics to any client or prospective client upon request. It is also available on our website at <https://www.hazlettmanagementgroup.com/>

Hazlett Management Group LLC does not participate in any client transactions.

Hazlett Management Group LLC may buy or sell the same securities as those we recommend to our clients in personal accounts. This may create a conflict of interest if a client's transactions can affect the price of the security. To mitigate the conflict of interest, we do not allow employees of Hazlett Management Group LLC to transact in thinly-traded, low-volume securities for thirty days after recommending it to a client other than regular, scheduled purchases or sales. High-volume securities in which price impact of client transactions is close to zero (i.e. Vanguard S&P 500 mutual fund, Apple common stock, etc.) are exempt from this restriction.

## **ITEM 12: Brokerage Practices**

Hazlett Management Group LLC does not receive any compensation, research, or soft-dollar benefits from broker-dealers in connection with client securities transactions.

### **ITEM 13: Review of Accounts**

Hazlett Management Group LLC does not periodically review client accounts or financial plans and does not provide regular reports to clients regarding their accounts in any format.

## **ITEM 14: Client Referrals and Other Compensation**

Hazlett Management Group LLC does not compensate for client referrals

## **ITEM 15: Custody**

Hazlett Management Group LLC does not have custody of client funds or securities. Clients receive quarterly statements from the custodian of their choice (e.g., Vanguard or Fidelity). Clients should carefully review the statements they receive from their custodian.

Hazlett Management Group LLC does not send client statements.



## **ITEM 16: Investment Discretion**

Hazlett Management Group LLC does not accept discretionary authority to manage securities accounts on behalf of clients.

## **ITEM 17: Voting Client Securities**

Hazlett Management Group LLC does not accept authority to vote client securities.

## **ITEM 18: Financial Information**

Hazlett Management Group LLC does not require prepayment of more than \$1,200 in fees per client six months or more in advance. Hazlett Management Group LLC do not have discretionary authority or custody of client funds or securities and has not been the subject of a bankruptcy petition at any time during the past ten years. As a result, Hazlett Management Group LLC are not required to provide a balance sheet.