

HADDONFIELD FINANCIAL PLANNING, LLC

FORM ADV PART 2A – DISCLOSURE BROCHURE

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Item 1 – Cover Page

This Form ADV Part 2A (“Disclosure Brochure”) provides information and the qualifications and business practices of Haddonfield Financial Planning, LLC (“HFP” or “the Firm”). If you have any questions or concerns about the contents of this brochure, please contact Adam V. Puff at 856-795-0471 or by email at adam@hfponline.com.

Haddonfield Financial Planning, LLC is a registered investment advisor located in the State of New Jersey. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities or regulatory authority. This Disclosure Brochure provides information through HFP to assist you in determining whether to retain the Advisor.

Additional information about Haddonfield Financial Planning, LLC is also available online at www.adviserinfo.sec.gov, by searching our name Haddonfield Financial Planning, LLC or use our CRD number 298177.

****Registration as an Investment Advisor does not imply a certain level of skill or training****

ITEM 2 – MATERIAL CHANGES

Form ADV Part 2 is divided into two parts: *Part 2A* (“Disclosure Brochure”) and *Part 2B* (“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, on the other hand, provides information specific to the personnel of the Advisor, which, in this case, Haddonfield Financial Planning.

Material Changes.

There are no material changes in this brochure from the last annual updating amendment of HADDONFIELD FINANCIAL PLANNING, LLC on January 23, 2020. Material changes relate to HADDONFIELD FINANCIAL PLANNING, LLC’s policies, practices or conflicts of interests only.

Future Changes.

The Advisor, at any time, may amend this Disclosure Brochure to reflect changes in a number of business related areas, including, but not limited to, our business practices and/or changes in regulations. When amendments to this Disclosure Brochure are made, the Advisor will either provide to each Client a copy of its updated Disclosure Brochure or provide a summary of material changes to its Disclosure Brochure and an offer to send an electronic or hard copy of same.

View Disclosure Brochure

You may view, at any time, Advisor’s current Disclosure Brochure online at the SEC’s website, www.adviserinfo.sec.gov, by searching for our firm or by our CRD number 298177.

You may also request a copy of this Disclosure Brochure, at any time, by contacting Advisor at 856-795-0471.

As with all of the Firm’s documents, we encourage all clients and prospective clients to review this Disclosure Brochure in its entirety and ask questions at any time prior to or throughout the engagement. Our contact information can be found on at Item-1, Cover Page.

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Important Information

Throughout this Disclosure Brochure, Haddonfield Financial Planning, LLC, may also be referred to as “the Firm,” “Firm,” “Our,” “We” or “Us.” The client or prospective client may be referred to as “you,” “your,” etc. and may refer to both natural persons and legal

entities. Additionally, the term “Advisor” and “Adviser” are used interchangeably where accuracy in identification is necessary.

ITEM 4 – ADVISORY BUSINESS

Haddonfield Financial Planning, LLC (“HFP”) is an investment advisor registered with the State of New Jersey. HFP is organized under the laws of New Jersey as a Limited Liability Company (“LLC”) and formed as same in 2009. HFP was founded in 2009 and maintains a primary place of business located at 205 N. Haddon Avenue, Haddonfield, New Jersey.

HFP is not a subsidiary of nor does it control another financial services industry entity.

In addition to our registration as an investment advisor in New Jersey, HFP is registered, in Pennsylvania. HFP may become registered, licensed, or meet certain exemptions to registration and/or licensing in other jurisdictions in which investment advisory business is conducted.

Adam Van Voorhis Puff, is the President and Chief Compliance Officer (“CCO”) of Haddonfield Financial Planning, LLC. For a complete and full details of his education and professional background, please see Item-19 of this Disclosure Brochure.

General Description of Primary Advisory Services

The following is a brief description of HFP’s primary advisory services. At HFP, you can choose from one or more of our services, based on your individual objectives, investment style, risk tolerance, time horizon, need for ongoing advice, and your interest in particular investment solutions. HFP’s advisory services are designed to help you pursue your investment goals by providing you with investment advice and guidance to a range of investment solutions.

Client Consultation

Before implementing any investment strategy and services, HFP will dedicate time to learn and understand your personal background. In order to best implement and recommend investment advice, HFP will consult and discuss with each client’s background, family history, financial history and situation, personal beliefs, risk tolerance, time horizons, values, goals, objectives, and view for the future. These are just several of the numerous factors, specific to each client that HFP will need to understand before implementing an investment strategy.

Financial Planning Services

HFP provides a broad range of financial planning services. Financial planning is a comprehensive evaluation of an individual’s current and future financial state, with a focus on developing a strategy for each client. Each client holds their own personal beliefs,

values, goals, objectives, and view for the future, and, as such, HFP will work with you to develop a strategy that adequately accommodates your personal preferences.

Based on each client's financial situation, HFP will actively help individuals determine their short-term and long-term financial goal(s) and objective(s). Once a client's goal(s) and objective(s) are understood, HFP's role is to implement a comprehensive financial plan (a strategy) to reach their milestones. A client's strategy may include one investment solution or combine multiple numerous investment solutions.

Financial planning encompasses one or more areas of needs, including, but not limited to, personal spending and savings, investment planning, retirement planning, tax and cash flow, educational savings, and insurance.

Asset Management Services

HFP provides ongoing advisory services for asset management services. Asset management services are tailored specifically to each individual client. Based on an individual client's financial situations, goal(s) and objective(s), HFP will assist the client in determining which asset management services are appropriate. From this determination, a client strategy will be discussed and reviewed with each client. When approved, the client strategy will reflect each client's goals, objectives, risk tolerance and time horizons.

Factors considered in making this client strategy determination include the client's account size, risk tolerance, age and investing experience. For instance, the following explains a few factors:

- **Risk Tolerance**. Risk tolerance is a reflection of a client's ability and willingness to lose some or all the assets in their portfolio in exchange for greater potential returns. For instance, a portfolio with a more *conservative* risk tolerance typically includes a greater percentage of assets devoted to fixed-income and cash investments, rather than a higher allocation in equity securities (i.e., stocks). On the other hand, a client with a higher risk tolerance typically will devote a higher percentage of assets into equity securities, with a smaller focus on cash and fixed-income investments.
- **Time Horizon**. Time horizon is a reflection of how long a client expects to invest. For instance, a client in his early 30s will expect to invest through a majority of his/her working career and into retirement; whereas, a client in his/her 70s is focused on retirement

These factors are only some of the many factors that are discussed during a consultation with HFP. Once a plan is developed, HFP will continuously monitor the client's account(s) and make trades in clients account(s) when necessary. The extent of the HFP's adviser's role can be tailored specific to the client's goal(s) and objective(s).

Hourly Financial Consultations

HFP may provide Financial Planning Services and/or investment advice on an hourly basis of \$250. Please refer to Item-5 – Fees and Compensation for HFP’s hourly rate.

Financial consulting, includes, but is not limited to, comprehensive financial counseling and consulting to clients regarding an array of financial disciplines. Each client’s needs are unique and the recommendations and advice are tailored to meet their needs and objectives. Although each client may have different needs and objectives, the following is a list of types of services routinely provided:

- New Worth Reporting
- Asset Allocation
- Investment Planning
- Retirement Planning
- Estate Planning (Financially)
- Charitable Gifting Strategies
- Employee Benefits Analysis
- Cash-Flow Planning
- Risk Management and Insurance

Individual Consultations

In addition to the above reference advisory services and consultations, HFP may engage as a consultant to select individuals.

Types of Investments

HFP’s investment recommendations will generally include advice regarding the following:

- Securities (stocks)
- Mutual Fund Shares
- United States Government Securities
- Certificates of Deposit
- Corporate Debt Securities
- Municipal Securities
- Life Insurance
- Annuities
- Options Contracts on Securities
- Exchange-Traded Funds (ETFs)
- Closed-end Funds (CEFs)

Typically, when providing services for our clients, HFP will build diversified portfolios. A diversified portfolio normally consists of fixed income investments, annuities, mutual funds and equities, and other investments.

Assets Under Management

As of December 31, 2020, the total amount of clients' assets under management by HFP under fee-based arrangements was \$50,600,000.00. Of this total, approximately \$45,000,000.00 of these assets are managed on a discretionary basis and approximately \$5,600,000.00 are managed on a non-discretionary basis.

ITEM 5 – FEES and COMPENSATION

The following paragraphs detail the fee structure and compensation procedures for services provided by HFP. Additionally, the fee rates or other compensation rates attributable to each client will be set forth in the fee schedule section of your Client Agreement contract with HFP.

The fee rate applicable to your account is generally based on the value of the assets in your account. Notwithstanding the foregoing, HFP and the client may agree to a rate less than the maximum rate. The extent to which HFP may agree on a fee rate that is less than the maximum rate rests solely with HFP's discretion.

HFP may provide consultation services or a financial plan pursuant to a Financial Planning Service Agreement. The hourly rate for same is \$250. Fees for Financial Planning Services will be billed hourly and statements for services provided will be sent to the Client each quarter. The fees shall be collected by check from Client.

Fees for Financial Planning Services

HFP will never require payment of more than \$500 in fees more than six (6) months in advance.

Fees for Asset Management Services

HFP may provide asset management services (*i.e.*, investment advisory services) to clients in addition to other services. The fee for services is based on a percentage of the market value of the assets under management. Advisory fees are payable monthly, in arrears, and shall be calculated by multiplying the aggregate market value of the account assets under management with the client's corresponding fee schedule on the Advisory Agreement. The market value of the assets under management shall be based on the market value of the managed assets as of the last calendar business day of the month. This fee is negotiable. HFP's current fee schedule is as follows:

For the first \$1,000,000	1%
For \$1,000,000 to \$5,000,000	.9%
Accounts over \$5,000,000	Negotiable

Annuities

When you invest in annuities, you will be subject to fees and charges that are specific to that annuity product, however, HFP will not charge any additional fees for an annuity product. Any fee charged to you by the annuity company, will be presented in your annuity contract between you and the annuity insurer/insurance company. The fees and charges associated with annuities may include, but not limited to, expense risk charges, administrative and distribution fees, mortality charges, charges for optional benefits, and surrender charges. The terms of the annuity are set forth in the contract between you and the annuity insurer/insurance company. For a complete understanding of the fees and charges specific to that annuity product, please see your annuity contract. Again, HFP does not charge an additional fee for an annuity product.

Fixed Fee Compensation

HFP may offer fixed fee compensation pursuant to a Financial Planning Agreement. HFP's for fixed fee compensation for financial planning shall be established in a written services agreement (Financial Planning Agreement) and the amount of the fixed fee may vary. Fees may vary for several reasons, including, but not limited to, the amount of estimated services anticipated, the size and complexity of the Client's financial portfolio and the anticipated services to be provided. Fees shall be collected upfront from the client.

Other Fees and Expenses

Asset management fees may be in addition to any fees and/or expenses of any mutual fund, separate account management, limited partnerships (proprietary or external), or other manager as the case may be. Such fees are required to be disclosed separately by the respective disclosure documents of the particular investment.

HFP does not cover:

- Transaction charges on trades effected through or with an unaffiliated investment firm;
- Any charge or commission that is incurred in connection with effecting a transaction for your account;
- Transfer taxes;
- Electronic fund, wire and other account transfer fees;
- Fees and expenses associated with your use of an unrelated custodian account; and
- Any other charges imposed by law, regulation, or otherwise agreed to with regard to your account.

Retainer Agreements

Clients may retain HFP for financial planning services with payment of a retainer agreement. If a retainer agreement is selected, pursuant to the Financial Planning Service Agreement, Client may pay HFP a retainer as set forth in the Agreement and remit the

balance of payment thereafter upon either completion and representation of the financial plan or upon completion of consultation services.

In no event will HFP ever require payment of more than \$500 in fees more than six months in advance.

Deduction of Fees

The specific manner in which we charge fees is established in the Client's written Advisory Agreement. HFP generally will bill fees in arrears each calendar month directly from the Client's account, unless otherwise specified in writing between the Client and HFP. Fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar month, with the exception of *de minimis* contributions and withdrawals.

Upon termination of any account, any prepaid, unearned fees, if applicable, will be refunded, and any earned, unpaid fees will be due and payable to HFP.

For employer sponsored programs, the specific manner in which HFP will charge a fee shall be established in a written services agreement with the sponsoring employer.

Additional Information Regarding Fees

For any additional questions and information regarding the billing methodology and fee rates charged, please review HFP's Compliance Policies & Procedure Manual or speak with HFP directly at 856-795-0471 or by email at adam@hfponline.com.

ITEM 6 – PERFORMANCE BASED FEES and SIDE-BY-SIDE MANAGEMENT

Item 6 is not applicable to HFP's Disclosure Brochure because HFP does not charge or accept performance-based fees for its investment advisory services. Performance-based fees are fees based on a share of capital gains or capital appreciation on the assets held within a client's account.

The fees charged by HFP, as described in Item-5 above, are not based upon the capital appreciation of the funds or securities held by any client.

ITEM 7 – TYPES OF CLIENTS

HFP offers investment advisory services to a wide range of clients, including:

- Individuals and Families
- High-Net Worth Individuals and Families
- Trusts and Estates
- Institutional Clients
- Pensions and Profit-Sharing Plans
- Charitable Organizations

Minimum Investment Amounts Required.

HFP recommends a minimum account size of \$250,000, however, we reserve the right to implement higher account minimum and/or waive any such account minimums at the discretion of the Firm.

Program Minimums

HFP does not generally adhere to a minimum asset requirement for a client. There are, however, certain strategies and investment products that may require a minimum investment amount.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES, RISK OF LOSS

Methods of Analysis

HFP strives to manage the risk of loss by clients through proper diversification and risk management. Our Advisors work with each client to identify their risk tolerance and goals and objectives. With the understanding that every Client is unique, the Advisor will help the client construct an investment portfolio in an attempt to achieve their goals and objectives. In striving to achieve the Client’s investment goals and objectives, our Advisors use the following methods of analysis in formulating our investment advice and/or managing client assets:

- Fundamental Analysis
- Technical Analysis
- Strategic Asset Allocation
- Portfolio Management
- Micro & Macro Economic Analysis

Investment Strategies

HFP uses the following strategies in managing client accounts, provided that such strateg(ies) are appropriate to the specific needs of the client and consistent with the client’s investment goal(s), objective(s), financial situation and risk tolerance, among other considerations. HFP may use a wide range of investment vehicles and products in an attempt to achieve the goals and objectives for each client. These investments may

include individual securities, mutual funds, annuities, bonds, exchange-traded funds (ETFs), and third-party managed accounts and/or securities.

HFP generally adheres to a long-term, “buy-and-hold” investment philosophy, when it is believed to be in the best interest or investment decisions for a particular client. While HFP reserves the right to act otherwise if it feels that it is best interests of its Clients, HFP does not try to time the market. In general, HFP does not always react to market movements in managing Client Accounts, unless it feels it is in the best interest or investment decision of a Client to act.

HFP generally utilizes a variety of investment securities and assets in an attempt to maximize a portfolios expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by selecting the proportions of various asset classes rather than selecting individual securities, for instance. Among the more commonly investment securities and assets, are ETFs, individual securities, and mutual funds.

An ETF, or exchange-traded fund, is a marketable security that tracks an index, a commodity, bonds, or a basket of assets such as an index fund. An ETF trades like a common stock on a stock exchange. Similar to a common stock, an ETF experiences price changes throughout a trading day as they are bought and sold. ETF’s are often utilized by HFP as an alternative to mutual funds, as ETF’s generally have higher daily liquidity and lower fees in comparison to mutual fund shares.

Mutual funds are another investment vehicle, comprised of a pool of money collected from many investors for the purpose of investing in securities such as stocks, bonds, money market funds and other assets. Mutual funds are managed by professional money managers, who allocate the fund’s investments and attempt to produce capital gains and/or income for the fund’s investors.

Stocks, also known as shares and equity, is a type of security that signifies ownership in a corporation and represents a claim on part of a corporation’s assets and earnings. Within the umbrella term of stocks, there are two main types of stocks: common stocks and preferred stocks. Common stocks typically entitle the owner to vote at shareholders’ meetings and to receive dividends.

Risk of Loss

All investments involve risk. HFP Advisers cannot guarantee any level of performance or that any Client will avoid a loss of Account assets. HFP believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk associated with each client; however, there is no guarantee that an investment objective will be achieved.

Every client should understand such risk inherent in investing and be prepared to bear same. Because of the inherent risk of loss associated with investing, HFP is unable to represent, assure, guarantee, or even imply that our services, methods of analysis and/or investment strategies will successfully result in future earnings and/or shield a client from

possible loss(es). Overall, investment performance can never be represented, predicted or guaranteed, and the value of your assets will fluctuate due to market conditions and other factors.

When evaluating risk, financial loss may be viewed differently by each Client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential issues. All of the above securities and investments have different levels of risk. As stated in the foregoing, risk takes on many forms but can be broadly categorized as the chance an outcome or investment's actual return will differ from expected outcome or return.

Depending on the different types of investments and chosen course of investing, there may be varying degrees of risk. Because risk is dependent upon the individual client, HFP will work closely with each client to understand your tolerance for risk. You, as the investor and client, assume the risk involved with investing in securities and other investment products. As required by law, you will be sent a copy of the prospectus or disclosure document for certain assets purchased for your investment plan, and you should read such documents.

ITEM 9 – DISCIPLINARY INFORMATION

Item 9 is not applicable to HFP's Disclosure Brochure because there are no legal or disciplinary events that involve either HFP or its Member(s).

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS

HFP policy requires associated persons to conduct business activities in a manner that avoids Conflicts of Interest between the Advisor and its clients, or that may be contrary to law.

HFP is not and does not have a related company that is a:

1. Broker-Dealer, Municipal Securities Dealer, Government Securities Broker-Dealer;
2. Investment company or other pooled-investment company;
3. Other investment advisor or financial planner;
4. Future commission merchant, commodity-pool operator, or commodity-trading advisory;
5. Banking or thrift institution;
6. Accountant or accounting firm;
7. Lawyer or law firm;
8. Insurance company or Agency;
9. Real estate broker or dealer; or
10. Sponsor or Syndicator of limited partnerships.

HFP will provide disclosure to each client prior to and throughout the term of a client engagement regarding any Conflicts of Interest involving its business relationships that might reasonably compromise the Advisor's or Members impartiality or independence.

Adam V. Puff is licensed as an insurance agent and is registered 1065478.

Maximilian Wilson is a part-time residential appraiser. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Haddonfield Financial Planning LLC always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any representative of Haddonfield Financial Planning LLC in such individual's outside capacities.

ITEM 11 – CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS, & PERSONAL TRADING

HFP has adopted and implemented a Code of Ethics expressing HFP's commitment to ethical conduct. Our Code of Ethics sets forth and defines our high ethical standards of business conduct and our fiduciary commitment to each client. Our Code of Ethics is based on the principles that clients' interests come first and all business must be conducted with integrity and professionalism.

An investment advisor is considered a "fiduciary." As a fiduciary, HFP has a duty of utmost good faith to act solely in the best interest of each client. This fiduciary duty extends to all clients of HFP.

HFP requires that all of their individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.

HFP's Code of Ethics further includes a policy expressly prohibiting the use of material and non-public information.

Privacy Policy

HFP respects the privacy of all clients and prospective clients (collectively termed "customers" per regulatory guidelines), both past and present. As a "customer" it is recognized that you have entrusted HFP with non-public personal information. HFP's privacy policy expressly prohibits the disclosure of customer's non-public personal information to anyone, except in the following circumstances:

- When required to provide services our customers have expressly requested;
- When our customers have expressly authorized HFP to do so;
- When required during the course of a firm assessment (i.e., audit); or
- When permitted or required by law (i.e., periodic regulatory examination or duly authorized Power of Attorney or Guardianship).

Personal Trading

HFP does not trade for its own account. The firm's personnel (i.e., principal, members, and/or employees), however, may buy or sell, for their personal accounts, securities identical to or different from those recommended to our clients. Owning the same securities recommended by HFP to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. The applicable policies and procedures are noted in this Section – Code of Ethics – and ensure that any related person/personnel (principal, members, and/or employees of HFP) will not receive preferential treatment over a client.

HFP has no material interest in any securities traded in client accounts.

ITEM 12 – BROKERAGE PRACTICES

HFP does not require a client to custody their assets with a certain Broker-Dealer/Custodian.

HFP *recommends* that its investment management clients custody their accounts and/or assets at National Financial Services, N.F.S. (more formally known as Fidelity) as an unaffiliated Broker-Dealer/Custodian with which Haddonfield Financial Planning LLC has a relationship. However, at the Client's discretion, the Client may custody their accounts and/or assets with Broker-Dealer/Custodian.

HFP may receive research and other ancillary soft-dollar benefits from Investment companies. These benefits are made available to all advisors and are regularly distributed throughout the investment advisory and retirement plan industry. Such information received assists HFP in staying current on changes in the industry and the investment business. HFP does not receive special or exclusive soft-dollar benefits. HFP would reject any research or soft-dollar benefits that deviate from the industry norm.

ITEM 13 – REVIEW OF ACCOUNTS

HFP will review Client accounts, at least, quarterly unless changes in the Client's financial situation and/or changes in the market require more frequent reviews. Depending upon the nature of the Client's investments, reviews may also be triggered by the passage of time, other factors or by request of the Client. The Advisor responsible for a Client may conduct all account reviews on behalf of HFP.

The frequency and nature of reviews and reports to Clients are determined primarily by the particular needs of each Client. Statements shall be sent each month to each Client from their Broker-Deal and/or Custodian. Clients may also request periodic reports from HFP.

Each client shall receive account statements directly from the Broker-Dealer and/or Custodian. HFP requests that each client carefully review these statements. In the event that a Client also receives an account statement or report from HFP, each client is encouraged to compare the account statement they receive from the Custodian with the statement or report they receive from HP. In this event, the Client shall rely solely on the account statement received from the Custodian.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

HFP does not act as a solicitor.

The only other compensation received from advisory services is the compensation of advisory fees charged for providing investment advisory services, as set forth in detail in Item 5 of this Form ADV-Part 2A Disclosure Brochure. HFP receives no other forms of compensation in connection with providing investment advice.

ITEM 15 – CUSTODY

HFP does not have, accept, or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. However, HFP is deemed to have limited custody solely because advisory fees are directly deducted from Client's account by the Custodian on behalf of HFP. Such limited custody is authorized by the written authorization by Client to have advisory fees deducted. Further, the Custodian will send monthly statements to Client. For an explanation of statements, please refer to Item 13, Review of Accounts.

ITEM 16 – INVESTMENT DISCRETION

HFP generally has discretion over the selection and amount of securities to be bought and/or sold in Client accounts without obtaining prior consent or approval from a Client. These purchases or sales, however, may be subject to specified investment goals and objectives, guidelines, or limitations as set forth by the Client and agreed to by HFP.

Discretionary authority will only be authorize upon full disclosure to the Client and shall be evidenced by the Client's execution of the Advisory Agreement.

All discretionary trades made by HFP shall be in accordance with each Client's investment goals and objectives.

ITEM 17 – VOTING CLIENT SECURITIES

HFP does not accept proxy-voting responsibility for any Client, therefore, the Client retains the sole responsibility for proxy decisions and voting. Clients will receive proxy statements directly from the Custodian.

ITEM 18 – FINANCIAL INFORMATION

Item 18 is not applicable to HFP's Disclosure Brochure. HFP does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Accordingly, HFP is not required to include a balance sheet of the Firm's most recent fiscal year. Therefore, HFP is not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to Clients. Lastly, HFP has not been the subject of a bankruptcy petition at any time.

When a copy of the Brochure Documents are not provided to Client at least 48 hours prior to signing the contract(s), client has five (5) business days in which to cancel the contract, without penalty to Client.

ITEM 19 – CUSTOMER PRIVACY POLICY NOTICE

HFP is committed to safeguarding the use of your personal information that we have as your Advisor. HFP protects the security and confidentiality of the personal information we have and implements controls, pursuant to the Firm's Compliance Policies and Procedures Manual, to ensure that such information is only used for proper business purposes in connection with the management and/or servicing of our relationship with the Client. Our relationship with our Clients is the most important asset. Accordingly, HFP understands that you have entrusted our Firm with your private information, and we shall do everything we can reasonably do to maintain that trust.

HFP does not sell your non-public personal information. Further, HFP does not provide such information to others except for proper business purposes in connection with the servicing and management of our relationship or as required by law.

HFP has a principal executive officer, Adam V. Puff. Mr. Puff graduated from Bucknell University in 2004 and has worked in the financial industry since 2004. Mr. Puff's credentials, educational and professional background information may be reviewed in HFP's Form ADV Part 2B.

Mr. Puff has no legal or disciplinary events or records to report.

In the (unlikely) event that there were to be a change to this Customer Privacy Policy Notice that would permit or require additional disclosures of a Client's confidential

and/or non-public information, HFP will provide written notice to Clients, and Clients will be given an opportunity to direct HFP as to whether such disclosure is permissible.

If you have any further questions or concerns regarding HFP's Privacy Policy, please feel free to contact the Firm at 856-795-0471 or by email at adam@hfponline.com.