

Introduction

Hart & Patterson Financial Group LLC (“HPFG”) is registered with the Securities and Exchange Commission as an investment adviser and located in Massachusetts. Registration does not imply any specific level of skill or training. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

HPFG provides personalized investment management and financial planning services to individuals, families, trusts, charitable organizations, and foundations. In most instances, HPFG uses a third-party money manager (“TPMM”) to provide these services. HPFG has a \$1,000,000 minimum portfolio value for an investment advisory relationship, which may be waived at the discretion of HPFG.

Financial Planning

HPFG offers financial planning on a stand-alone basis. This process begins with a discovery meeting to review a client’s financial details, understand their questions and concerns, and explore short and long term financial goals. After the discovery meeting, the HPFG team reviews the information and builds a draft plan. HPFG presents the draft plan and works in a collaborative process with the client to finalize the plan. Depending on the plan complexity, this stage may involve multiple meetings. The objective of the financial planning process is to assess a client’s overall financial well-being, identify any opportunities or risks in the plan, review various scenarios, and implement the agreed upon strategies and actions. Recommendations in the final plan do not need to be executed through HPFG.

Investment Management

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

Once we ascertain your objectives for each account, in most instances we will select a third-party manager to allocate your assets and manage those assets according to your objectives. This is done on a discretionary basis, which means the TPMM will invest your assets in accordance with your stated investment objectives and without soliciting your consent prior to engaging in portfolio transactions. You will sign a discretionary agreement allowing us to do this. We will rely on investment model portfolios and strategies developed by the TPMM. We will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed, we will work with the TPMM to complete them. These changes may involve selling a security or group of investments and buying others, keeping the proceeds in cash, or changing portfolio managers.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business and Item 7 Types of Clients.

 **“Given my financial situation, should I choose an investment advisory service? Why or why not?”**

 **“How will you choose investments to recommend to me?”**

 **“What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?”**

What fees will I pay?

Generally, fees vary from 0.50% to 1.25% per annum of the market value of a client’s assets managed by HPFG. The fee range stated is a guide. Fees may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account or any other unique factors that may exist. Investment advisory fees will be debited directly from each client’s account. The advisory fee is paid quarterly, in arrears, and the value used for the fee calculation is the average daily account balance of the previous quarter, excluding any cash in the client’s account or any assets that we don’t manage.

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

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more specific information regarding our fees, please refer to our disclosure brochure, the ADV Part 2A under Item 5 Fees and Compensation.

 ***“Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?”***

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

HPFG employee Kelly Reid is a registered representative of Purshe Kaplan Sterling Investments, Inc. (“PKS”), a FINRA member broker-dealer. The relationship with PKS allows Susan to receive customary, commission-based compensation on investment products previously sold to clients. No HPFG professional continues to sell any commission-based products through PKS or any other broker-dealer. PKS is not affiliated with HPFG or considered a related party. Commissions charged for these products will not offset management fees owed to HPFG. Please review the PKS Form ADV for more information.

HPFG utilizes third-party money managers to assist in the management of client assets. HPFG’s primary investment management and custodial relationship is with SEI Private Trust Company and SEI Investments Management Company (“SIMC”), a federally registered investment advisor. These managers are selected after a process whereby our custodian SEI evaluates each manager’s investment performance, operations, and offerings to determine if the manager would be a fit for HPFG clients. This process continues on an ongoing basis, throughout the time the client works with the third-party manager. Fees paid to these managers, and SEI, are separate from, and in addition to, fees paid to HPFG.

For more specific information regarding our fees, please refer to our disclosure brochure, the ADV Part 2A under Item 5 Fees and Compensation.

 ***“How might your conflicts of interest affect me, and how will you address them?”***

How do your financial professionals make money?

Financial professionals of HPFG are paid a portion of the asset management/planning fees collected from clients. The more assets the client has in his/her account, the more we receive in fees. We therefore have an incentive to encourage a client to increase the assets in his/her account. Financial professionals are not rewarded sales bonuses.

Do you or your financial professionals have legal or disciplinary history?

No. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS).

 ***“As a financial professional, do you have any disciplinary history? For what type of conduct?”***

Additional Information

Additional information about our investment advisory services can be found at www.hartpatterson.com. A copy of our *relationship summary* can also be requested by calling 413-253-9454.

 ***“Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?”***

 ***“Who can I talk to if I have concerns about how this person is treating me?”***

 = Conversation starter. You may consider asking your financial professional these questions.