

**Item 1: Cover Page for Part 2A  
of Form ADV: Firm Brochure  
March 19th, 2024**

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This brochure provides information about the qualifications and business practices of H&H Retirement Design and Management, Inc, ("HHRDM"). If you have any questions about the contents of this brochure, please contact us at 844-702-1040 or HHRDM.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 HHRDM is also available on the Securities and Exchange Commission's ("SEC") website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 171150

## **Item 2: Material Changes to Our Part 2A of Form ADV: Firm Brochure**

This Firm Brochure, dated March 2024, is our disclosure document prepared according to SEC and state requirements and rules. As you will see, this document is a narrative that is substantially different in form and content and includes some new information that we were not previously required to disclose. This Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year.

Furthermore, we will provide you with other interim disclosures about material changes as necessary.

Since our last annual amendment filing, we have the following material changes to report about our Brochure:

- 1) Update email
- 2) Added Orion as additional tool for financial planning and vault
- 3) Added Interactive Broker as a Custodian
- 4) Added H & H Tax and Business Advisors, LLC (Item 10)

## Item 3: Table of Contents

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## Item 4: Advisory Business

HHRDM is an SEC-registered investment adviser with its principal place of business located in Las Vegas, NV. HHRDM began conducting business in 2014. All material conflicts of interest are disclosed below regarding our firm, our representatives, or our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice. HHRDM is 100% owned by Kenneth Himmler.

HHRDM offers the following advisory services to our clients:

### INVESTMENT SUPERVISORY SERVICES ("ISS")

Our process begins with a comprehensive and thorough analysis of cash flows, tax projections, investment risk, and estate plan. Through this process we develop a layered portfolio strategy that allocates a certain amount of assets to fixed investments and the balance to equities.

HHRDM's goal is to create financial plans that are coordinated with the portfolio structure. Through the planning process with the client in which the client's goals and objectives are established, we determine if and or what model portfolio is suitable to the client's circumstances. Once we determine the suitability of the portfolio, the portfolio is managed based on the portfolio's goal. Clients retain individual ownership of all securities. Clients retain all title of accounts in whichever custodian's client holds assets in. HHRDM does not take any custody of client's funds in any manner.

Once the clients' portfolios and investment strategies have been implemented then the client has the choice of services. We provide a portfolio structure which includes rebalancing and security selection.

### Investment Management (Level 1)

A Level 1 client is entitled to one annual meeting up to 2 hours. Additional time is billed at the current hourly billing rate of the person the client meets with. After the time is concluded, the client is emailed an invoice for any additional time in excess of the allowable time.

### Investment Management with Gamma Overlay (Level 2)

All the services provided under Level 1 + we employ GAMMA which is tax management of the accounts. We strive to reduce the tax effect of trades and review how we allocate the investments. The client is entitled to a certain number of hours depending on the amount that we are managing.

### Total Wealth Oversight (Level 3)

Includes all services under Level 1 + Level 2. In addition, we create a full financial plan within eMoney and use eMoney to oversee all aspects of a client's financial plan. In addition, the client is entitled to more hours. The number of hours is dependent on the amount that we are managing. Investment Management.

We manage these advisory accounts on a discretionary basis. Account supervision is guided by the client's stated objectives and the creation of the financial plan.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-Listed Securities
- Securities traded over-the-counter
- Foreign Issuers
- Warrants
- Corporate Debt Securities (Other than commercial paper)
- Commercial Paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual Fund Shares
- United States governmental Securities
- Options Contracts on Securities
- Interests in partnerships investing in real estate

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability and a financial plan.

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's financial circumstances, we will:

1. At least annually, contact each participating client to determine whether there have been any changes in the client's financial situation or investment objectives, and whether the client wishes to impose investment restrictions or modify existing restrictions;
2. Be reasonably available to consult with the client (see AUM contract for allowable hours);  
and
3. Maintain client suitability information in each client's file.

## INDIVIDUAL PORTFOLIO MANAGEMENT

Our firm provides continuous asset management of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on the client's particular circumstances are established, we develop the client's personal financial plan. We create and manage a portfolio based on that plan. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we may also review and discuss a client's prior investment history, as well as family composition and background. We provide all recommendations only after a complete analysis through Orion or eMoney financial planning software.

Once the client's portfolio has been established, we review the portfolio annually, and if necessary, rebalance the portfolio on an annual basis, based on the client's individual needs, but may rebalance more often dependent upon clients' needs or changes, economic fundamentals, and/or the portfolio parameters.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issues
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposits
- Variable life insurance
- Variable annuities
- Mutual Fund Shares
- United States governmental securities
- Options contracts on securities
- Interests in partnerships investing in real estate Index Selection, Distribution Strategies on Equity Indexed Annuities

Because some types of investments involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

## MANAGER SELECTION PROGRAMS

We also offer advisory management services to our clients through the Manager Selection Programs (hereinafter, "Programs").

Our firm provides the client with an asset allocation strategy developed through personal discussions in which goals and objectives based on the client's particular circumstances are established.

Based on the client's individual circumstances and needs we will then perform management searches of various unaffiliated registered investment advisers to identify which registered investment adviser's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy of the selected registered investment adviser. Clients should refer to the selected registered investment adviser's Firm Brochure or other disclosure document for a full description of the services offered. We are available to meet with clients (See individual AUM contract for allowable hours) to review the account. These programs are often referred to as "Robo-Advisors". We do not select the underlying stocks or ETF's, rather the program sponsors offer models to choose from. Furthermore, we do not offer ongoing investment oversight but will counsel with the client as to changes in their lives that may require a change in the model.

### Investment Advisor Representative

We monitor the performance of the selected Investment Advisor Representative(s). If we determine that a particular selected Investment Advisor Representative(s) is not providing sufficient management services to the client or is not managing the client's portfolio in a manner consistent with the client's objectives and Orion or eMoney plan, we may suggest that the client work with a different registered investment adviser and/or program sponsor. Under this scenario, our firm assists the client in selecting a new registered investment adviser and/or program. However, any move to a new registered investment adviser and/or program is solely at the discretion of the client.

## FINANCIAL PLANNING

We provide financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables, to strive to predict future cash flows, asset values, and withdrawal plans. Through the financial planning process, all questions, information, and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. We are required to disclose to our financial planning clients that a conflict of interest exists between us and our clients. The client is under no obligation to act upon the investment adviser's recommendation. If the client elects to act on our recommendations, the client is under no obligation to engage us for our investment management services. Clients may also purchase the Orion or eMoney service to receive access to an online platform which provides the client with a detailed financial plan designed to assist the client strive to reach his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information, and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current, and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning, and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid, and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives, and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a financial plan based on the client's stated financial goals and objectives.

Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, and/or insurance agent. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning, and business planning such as:

- Exchange-listed securities.
- Securities traded over the counter; and
- Foreign issuers

Typically, the online access to the financial plan is available to the client within sixty days after HHRDM has received all required data from the client. As individuals of HHRDM are/may be, licensed/registered as insurance agents/brokers of various insurance companies, recommendations made in financial plans are not limited to only those products offered through these companies.



## PUBLICATION OF PERIODICALS

We do not produce any newsletters.

### **Item 5: Fees & Compensation**

#### PORTFOLIO MANAGEMENT FEES

Our annual fees for Portfolio Management Services are based upon a percentage of assets under management and generally range from 0.50% to 2.25%, depending on the level of services offered. Please refer to the official Investment Management Agreement for details and fee breakpoints. Lower fees may be available through other sources for similar services.

Due to the acquisition of other firms and additional Investment Advisory Representatives certain clients may have different fee schedules. Fee schedules may be more or less for certain clients based on previous negotiations.

Clients have the right to change their plan with a sixty (60) day notice in writing. One change of plan is permissible per year at no cost and \$250 per change thereafter.

A one-time assessment of (0.10%) against the total assets will be billed to the client for time and expense of consolidation, transferring, re-titling and setting up of the assets into our management systems. This would also include funding of a revocable trust but does not include real estate.

Our fees are billed quarterly, in advance, at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Client Services Agreement. (Wealth Management Agreement)

A minimum of \$1,000,000.00 of assets under management is required for this service. This account size may be negotiable under certain circumstances. HHRDM may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Limited Negotiability of Advisory Fees: Although HHRDM has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

## FINANCIAL PLANNING FEES

HHRDM's Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client. Lower fees for comparable services may be available from other sources.

### Initial Financial Plan

Base (Level 1)	\$1,595
Advanced (Level 2)	\$2,499
Complex (Level 3)	\$4,999

The length of time it will take to provide a Financial Plan will depend on each client's personal situation.

Management personnel and other related persons of our firm are licensed as insurance agents or brokers. In their separate capacity(ies), these individuals are able to implement insurance recommendations for advisory clients for separate and typical compensation (i.e., commissions or other sales-related forms of compensation). This presents a conflict of interest to the extent that these individuals may recommend that a client invest in an insurance program which results in a commission being paid to the individuals. Clients are not under any obligation to engage these individuals when considering implementation of advisory recommendations. If there is a no commission or no-load product used and a due diligence report is needed, then the planner/agent will discuss the cost to perform the report prior to the work being done. If there is a commission being provided either directly by insurance company or indirectly through an insurance broker this payment is consideration for the additional design and implementation of any insurance products but does not entitle the client to ongoing management or services without a fee or hourly charge. Clients are free to choose whether to place such insurance products through the representatives of HHRDM or through their own insurance agent. Insurance companies and certain selected insurance brokers also provide ancillary services such as technology to produce illustrations, assist in completing and processing paperwork and other practice benefit services. These services can create a conflict of interest of selection of insurance brokerage companies based on services they provide.

## GENERAL INFORMATION

**Termination of the Advisory Relationship:** Client may terminate an Investment Management Agreement by written notice given within five (5) days after the date of said Agreement and receive full refund of all fees paid to HHRDM. The Investment Management Agreement may also be terminated by either party for any reason upon thirty (30) days written notice to the other party prior to the end of the calendar quarter. If notice is received greater than thirty-one (31) days prior to the end of the calendar quarter then the agreement will terminate upon the end of the current calendar quarter in which the request was received. If notice is received less than thirty-one (31) days prior to the end of the current calendar quarter then the termination will be the end of the current calendar quarter. Prorated fees will not be refunded as the terminate date will be at the end of the current calendar quarter. Prorated fees are only refunded if written termination is greater than 31 days prior to the end of the current calendar quarter.

**Mutual Fund Fees:** HHRDM will not at any time accept any payments, fees, 12B-1 fees or any compensation directly from or indirectly from any mutual fund company or representative.

**Wrap Fee Programs and Separately Managed Account Fees:** Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the independent advisers, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage, and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer and/or money manager(s), the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients. Currently, HHRDM does not offer Wrap Fee Programs. We may have legacy clients in wrap programs, but we do not currently as of 12/31/2019 offer wrap programs.

**Additional Fees and Expenses:** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers and/or money manager(s), including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

**Grandfathering of Minimum Account Requirements:** Pre-existing advisory clients are effective at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients. In addition, we may waive our fee minimums if the client is working with other related companies in their business such as our accounting and tax company or our company benefits company.

**ERISA Accounts:** HHRDM is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation.

**Advisory Fees in General:** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers and their fees may be higher or lower depending upon the services provided, the level of experience, as well as the education of the advisor. We disclose that lower fees for comparable services may be available from other advisory services.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

## **Item 6: Performance-Based Fees & Side-By-Side Management**

HRDM does not charge performance-based fees.

## **Item 7: Types of Clients & Account Requirements**

HHRDM provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals);
- High net worth individuals
- Businesses
- Charitable Remainder Trusts
- Family Foundations
- Public Operating Charities
- Family Trusts

## **Item 8: Methods of Analysis, Investment Strategies & Risk of Loss**

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

**Fundamental Analysis.** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the mutual fund, ETF, or security is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Technical Analysis.** We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially foresee future price movement.

Technical analysis does not consider the underlying financial condition of a company, mutual fund, ETF, or security. This presents a risk in that a poorly managed or financially unsound company, mutual fund, ETF, or security may underperform regardless of market movement.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies (mutual fund, ETF, or security) whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

## INVESTMENT STRATEGIES

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

If we manage a portfolio as opposed to an outside manager, sub-advisor or program manager then we will evaluate based on:

Long-term purchases. We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Options. We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative because it derives its value from an underlying asset.

- We may sell a covered call if we determine it is in the best interest of the portfolio objective.
- We may sell a cash-covered Put if we determine that we want to own a certain security at a lower price
- We may buy a Put if the client requests downside protection on a portfolio or a security.

No option strategy is guaranteed to achieve its intended objective.

We may implement a strategy with a sub-advisor or a sub manager that implements hedging strategies.

Risk of Loss. Securities investments are not guaranteed, and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

### **Item 9: Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

### **Item 10: Other Financial Industry Activities & Affiliations**

Representatives of our firm, in their individual capacities, are agents for various insurance companies. As such, these individuals are able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client. Our related insurance agency is Integrated Wealth Management, LLC

Representatives of our firm may be working with you through H&H Retirement Design and Management, LLC. This work may involve tax preparation, tax planning, asset protection planning or business planning. As such, the ownership, CPA's or attorney's may be also Investment Advisor Representatives and may receive separate compensation resulting from hourly fees or project fees in relation to their working with you on legal issues or tax preparation or planning. These fees are separate and distinct from any investment management fees and are not to be considered as such.

Zeuss, LLC is a wholly owned company by Kenneth Himmler and acts as a Registered Agent Company for business clients that hold corporations or LLC's.

Wiser Wealth, LLC is a wholly owned company by Kenneth Himmler and is a company used for marketing and leads for client educational courses and services.

Adept Business Builders, LLC is 50% owned by Kenneth Himmler and is used as a business acquisition company.

H & H Financial Center is owned 50% by Kenneth Himmler and is a holding company.

H & H Tax and Business Advisors, LLC is owned 50% by Kenneth Himmler, and 50% by Julie Himmler and is used for tax and document preparation services.

Clients should be aware that the receipt of additional compensation by HHRDM and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. HHRDM endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- We disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- Our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

HHRDM and our personnel owe a duty of loyalty, fairness, and good faith toward our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

HHRDM's Code of Ethics further includes the firm's policy prohibiting access to non-public information. All employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are separately licensed as an insurance agent/broker of various insurance companies. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

## **Item 12: Brokerage Practices**

HHRDM will endeavor to make recommendations to clients to use those brokers or dealers which will provide the best services at the lowest commission rates possible. The reasonableness of commissions is based on the broker's stability, reputation, ability to provide professional services, competitive commission rates and prices, research, trading platform, and other services which will help HHRDM in providing investment management services to clients. HHRDM may, therefore, recommend the use of a broker who provides useful research and securities transaction services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance. Research services may be useful in servicing all our clients, and not all of such research may be useful for the account for which the particular transaction was affected.

Consistent with obtaining best execution for clients, HHRDM may direct brokerage transactions for clients' portfolios to brokers who provide research and execution services to HHRDM and, indirectly, to HHRDM's clients. These services are of the type described in Section 28(e) of the Securities Exchange Act of 1934 and are designed to augment our own internal research and investment strategy capabilities. This may be done without prior agreement or understanding by the client (and done at our discretion). Research services obtained may be developed by brokers to whom brokerage is directed or by third parties which are compensated by the broker. HHRDM does not attempt to put a specific dollar value on the services rendered or to allocate the relative costs or benefits of those services among clients, believing that the research we receive will help us to fulfill our overall duty to our clients. HHRDM may not use each particular research service, however, to service each client. As a result, a client may pay brokerage commissions that are used, in part, to purchase research services that are not used to benefit that specific client. Broker-dealers we select may be paid commissions for effecting transactions for our clients that exceed the amounts other broker-dealers would have charged for effecting these transactions if HHRDM determines in good faith that such amounts are reasonable in relation to the value of the brokerage and/or research services provided by those broker-dealers, viewed either in terms of a particular transaction or our overall duty to its ('brokerage') discretionary client accounts. In addition, brokers, custodians and or insurance brokers or agencies may provide ancillary benefits such as technology support, application filing, educational material or other administrative benefits to HHRDM and its advisors. These ancillary services from one brokerage over another could create a conflict of interest in the selection of certain insurance products or selected custodial services.



## BLOCK TRADING

HHRDM will block trades where possible at the discretion of the portfolio manager, and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block.

Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price. HHRDM will typically aggregate trades among clients whose accounts can be traded at a given broker, and generally will rotate or vary the order of brokers through which it places trades for clients on any particular day. HHRDM's block trading policy and procedures are as follows:

- 1) Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with HHRDM, or our firm's order allocation policy.
- 2) The trading desk in concert with the portfolio manager must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- 3) The portfolio manager must reasonably believe that the order aggregation will benefit and will enable HHRDM to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best price.
- 4) Prior to entry of an aggregated order, an electronically generated order ticket must be completed which identifies each client account participating in the order and the proposed allocation of the order, upon completion, to those clients.
- 5) If the order 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 pro rata among the participating client accounts in accordance with the initial order ticket or other written statement of allocation. However, adjustments to this pro rata allocation may be made to participating client accounts in accordance with the initial order ticket or other written statement of allocation. Furthermore, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account, or to avoid excessive ticket charges in smaller accounts.
- 6) Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order and must share in the commissions on a pro rata basis in proportion to the client's participation. Under the client's agreement with the custodian/broker, transaction costs may be based on the number of shares traded for each client.

- 7) If the order will be allocated in a manner other than that stated in the initial statement of allocation, a written explanation of the change must be provided to and approved by the Chief Compliance Officer no later than the morning following the execution of the aggregate trade.
- 8) HHRDM's client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.
- 9) Funds and securities for aggregated orders are clearly identified on HHRDM's records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.
- 10) No client or account will be favored over another.

HHRDM ("we"/"our") does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank.

We may recommend that our clients use Charles Schwab & Co., Inc. (Schwab) or Interactive Brokers, LLC (IBKR), both registered broker-dealers, members SIPC, as qualified custodians. We are independently owned and operated and are not affiliated with either Schwab or IBKR. Schwab or IBKR will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab or IBKR as custodian/broker, you will decide whether to do so and will open your account with Schwab or IBKR by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Schwab or IBKR, then we cannot manage your account.

#### YOUR BROKERAGE AND TRADING COSTS

For our clients' accounts that Schwab or IBKR maintains, Schwab or IBKR generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab or IBKR account. Certain trades (for example, many mutual funds, and U.S. exchange-listed equities and ETFs) may not incur Schwab or IBKR commissions or transaction fees. We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trade through Schwab or IBKR, we have determined that having Schwab or IBKR execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above. By using another broker or dealer you may pay lower transaction costs.

## PRODUCTS AND SERVICES AVAILABLE TO US FROM SCHWAB

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like ours. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through our firm. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available at no charge to us. Following is a more detailed description of Schwab's support services:

**Services that benefit you.** Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

**Services that do not directly benefit you.** Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, record keeping, and client reporting

**Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these

services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources.

#### TRADE ERRORS

In the event of a trade error, client accounts will be restored to the position they should have been in had the error not occurred. If a loss occurs as a result of a trade error, the party at fault will be responsible for the loss and the funds will be credited back to the client's account. If a net gain result (net gains are defined as positive error account balances resulting from trade corrections), the funds will generally be automatically moved to a designated trade error account on a daily basis, then subsequently donated to Street Teens Charity of Las Vegas.

### **Item 13: Review of Accounts or Financial Plans**

#### PORTFOLIO MANAGEMENT SERVICES

The firm will use Orion and eMoney to monitor the asset allocation of a client's portfolio. In addition, each client will have an annual review to determine the appropriateness of the asset allocation and investment selection.

**REPORTS:** Clients will receive online access to their investment allocations and strategies through Orion or eMoney (subject to additional fees), for financial planning.

#### SELECTION AND MONITORING OF THIRD-PARTY MONEY MANAGERS

**REVIEWS:** These client accounts should refer to the independent registered investment adviser's Firm Brochure (or other disclosure document used in lieu of the brochure) for information regarding the nature and frequency of reviews provided by that independent registered investment adviser.

HHRDM will provide reviews as contracted for at the inception of the advisory relationship.

**REPORTS:** These clients should refer to the independent registered investment adviser's Firm Brochure (or other disclosure document used in lieu of the brochure) for information regarding the nature and frequency of reports provided by that independent registered investment adviser.

HHRDM does not typically provide reports in addition to those provided by the independent registered investment adviser selected to manage the client's assets.

## FINANCIAL PLANNING SERVICES

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

**REPORTS:** Financial Planning clients will receive online access to their completed financial plan through Orion or eMoney (subject to additional fees).

### **Item 14: Client Referrals & Other Compensation**

It is HHRDM's policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

We receive a non-economic benefit from Schwab or IBKR in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab or IBKR. We benefit from the products and services provided because the cost of these services would otherwise be borne directly by us, and this creates a conflict. You should consider these conflicts of interest when selecting a custodian. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

### **Item 15: Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have actual or constructive custody of client accounts. All invoices will be uploaded to the clients Orion or eMoney Vault.

## **Item 16: Investment Discretion**

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

## **Item 17: Voting Client Securities**

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

## **Item 18: Financial Information**

Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. HHRDM has no additional financial circumstances to report.

HHRDM has not been the subject of a bankruptcy petition at any time during the past ten years.

## Item 19: Department of Labor

Department of Labor Acknowledgement of Fiduciary Duty - When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice)
- Never put our financial interests ahead of yours when making recommendations (give loyal advice)
- Avoid misleading statements about conflicts of interest, fees, and investments
- Follow policies and procedures designed to ensure that we give advice that is in your best interest
- Charge no more than is reasonable for our services
- Give you basic information about conflicts of interest

## Item 20: Principal or Control Persons

### A. Principal Executive Officers: Kenneth Himmler Born August 1, 1966

#### Business Background

2014 – Present: HHRDM Managing Member

1999 – 2014; Integrated Asset Management, LLC Managing Member

2004 – 2007; Trustmont Financial Group, Inc.; Registered Representative 1994-2004

Securities Services: Registered Representative

1986 – 1994 PML Securities: Registered Representative

#### Securities/Financial Exam Information

- Series 4                      04/24/2003
- Series 6                      06/25/1985
- Series 7                      03/17/1997
- Series 24                     07/01/1999
- Series 26                     11/14/1996
- Series 27                     01/07/2004
- Series 53                     11/11/2002
- Series 63                     07/11/1985
- Series 65                     04/14/1998

Educational Background/Professional Designations

2005 – Certified Estate Planner (CEP)

1998 – Certified Retirement Planning Counselor (CRPc™) College for Financial Planning

1998 – Certified Estate and Trust Specialist (CES) Institute of Business and Finance

1996 – Certified Fund Specialist (CFS®) Institute of Business and Finance

2016 – Certified Annuity Specialist (CAS) Institute of Business and Finance

2016 – Certified Tax Specialist (CTS) Institute of Business and Finance

2022 – Certified Tax Planner (CTP)

B. Outside Business Activities

Please see Item 10 of this Firm Brochure

C. Performance-based Fees

We do not charge performance-based fees

D. Disciplinary Or Legal Events

We do not have any disciplinary or legal events to disclose.

E. Relationships with Issuers of Securities We have nothing to disclose in this regard