



Planning - Prosperity - Peace

An Illinois Registered Investment Advisor

Haven Financial Solutions, Inc.
815 Oakton St.
Evanston, IL 60202-2803
(847) 864-2761
www.HavenFinancialSolutions.com

Form ADV Part 2
Advisory Brochure
March 6, 2025

This brochure provides information about the qualifications and business practices of Haven Financial Solutions, Inc. If you have any questions about the contents of this brochure, please contact Ms. Schultz at (847) 864-2761.

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 authority. Additional information about Haven Financial Solutions, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD number, which is 156422.

While the firm and its associates may be registered with the State of Illinois, it does not imply a certain level of skill or training on the part of the firm or its associated personnel.

Item 2 - Material Changes

The firm has amended its Form ADV Part 2 from the previous version dated March 26, 2024 to revise the amount of assets under management. For future filings, this section of the brochure may address only those material changes that have occurred since the firm's last annual update.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: www.adviserinfo.sec.gov or you may contact our firm at (847) 864-2761.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

Throughout this document, Haven Financial Solutions, LLC shall also be referred to as the "firm," "our," "we" or "us." These terms are utilized for the reader's ease of use while reviewing the brochure and are not meant to imply the firm is larger than it actually may be at the time of publication. The client or prospective client may also be referred to as "you," "your," etc., and refers to a client engagement involving a single *person* as well as two or more *persons*. The term "advisor" and "adviser" are used interchangeably where accuracy in identification is necessary (i.e., Internet address, etc.).

This brochure contains 32 pages and is not complete without all pages.

Item 3 – Table of Contents

Item 2 - Material Changes	2
Item 3 – Table of Contents	3
Item 4 - Advisory Business.....	5
Description of Our Advisory Firm	5
Description of Advisory Services Offered	5
Client Tailored Services and Client-Imposed Restrictions	6
Wrap Fee Programs	9
Client Assets Under Management.....	10
Item 5 - Fees and Compensation.....	10
Method of Compensation and Fee Schedule	10
Client Payment of Fees	11
Additional Client Fees.....	12
Charged Prepayment of Client Fees	12
External Compensation for the Sale of Securities to Clients	13
Item 6 - Performance-Based Fees and Side-By-Side Management.....	13
Item 7 - Types of Clients	13
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	14
Methods of Analysis and Investment Strategies	14
Investment Strategy and Method of Analysis Material Risks.....	15
Security-Specific Material Risks.....	16
Item 9 - Disciplinary Information.....	17
Item 10 - Other Financial Industry Activities and Affiliations.....	17
Broker-Dealer or Representative Registration	17
Futures or Commodity Registration	17
Material Relationships Maintained by this Advisory Business and Conflicts of Interest	17
Recommendation or Selection of Other Investment Advisors and Conflicts of Interest	18
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	18

Code of Ethics Description.....	18
Privacy Policy Statement	20
Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest.....	21
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest	22
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest	22
Item 12 - Brokerage Practices	22
Factors Used to Select Broker-Dealers for Client Transactions.....	22
Accounts Aggregating Securities Transactions for Client	24
Item 13 - Review of Accounts	25
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved.....	25
Review of Client Accounts on Non-Periodic Basis	25
Content of Client Provided Reports and Frequenc	26
Item 14 - Client Referrals and Other Compensation	26
Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest	26
Advisory Firm Payments for Client Referrals.....	26
Item 15 - Custody	27
Item 16 - Investment Discretion.....	28
Item 17 - Voting Client Securities	28
Proxy Voting	28
Other Corporate Actions	28
Receipt of Materials	29
Item 18- Financial Information.....	29
Balance Sheet	29
Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients.....	29
Bankruptcy Petitions during the Past 10 Years	29
Item 19 - Requirements for State-Registered Advisers.....	29
Principal Executive Officers and Management Persons.....	29
Educational Background and Business Experience	29
Other Business Activities	30
Additional Compensation	30
Disciplinary Information	31

Supervision	31
Requirements for State-Registered Advisers	31
Professional Designations	31

Item 4 - Advisory Business

Description of Our Advisory Firm

Haven Financial Solutions, Inc. is an Illinois-based company formed in 2010. Our firm is not a subsidiary of nor do we control another entity. In addition to our 2011 registration as an investment advisor in Illinois, our firm and its associates may register or meet certain exemptions to registration in other states in which we conduct business. Ms. Schultz noted in Item 19 of this brochure, is our firm’s sole shareholder and designated principal (Supervisor).

We hold ourselves to a *fiduciary standard*, which means our firm and its associates will act in the utmost good faith and perform in a manner believed to be in the best interest of our clients. As fiduciaries, we are obligated to put *you – our client – first*. We feel this sets us apart from other types of firms in the securities industry such as broker/dealers that may be held to a perhaps lesser “suitability” standard. Such firms may not be required under current regulation to place clients’ interests ahead of their own or to fully disclose conflicts of interest involving their recommendations to clients.

Description of Advisory Services Offered

Haven Financial Solutions, Inc. provides a range of investment advisory solutions to people from all walks of life. Our financial planning services include working with our clients in such areas as investment planning, retirement planning, cash flow and budgeting, tax planning, risk management, estate planning, divorce planning or other areas upon your request. We also provide periodic investment advice through consultations that do not include ongoing supervision or management of an investment account (we term *investment consultation*), as well as ongoing and continuous supervision of our client portfolios (termed *investment supervisory services*) and generally under an engagement allowing for discretionary account authority (*defined in detail in Item 16*).

We offer interested potential clients a 30-minute initial consultation (either in person or by phone) where they can share their goals and concerns and we can explain our services and procedures, and recommend what services might be appropriate. We charge \$150 for this initial consultation; if you subsequently engage the firm for financial planning services, we will credit that fee toward your engagement. Please see Item 5 – Fees and Compensation for more information about our fees. During or prior to the initial consultation, we will provide you with our current ADV Part 2 brochure that incorporates our privacy policy, as well as ensuring any material conflicts of interest are disclosed regarding our firm and its associates that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage our firm, we must enter into a written agreement. Thereafter, discussion and analysis will be conducted to determine your financial need, goals, holdings, etc. Depending on the scope of the engagement, we may require current copies of the following documents early in the process:

- Wills, codicils and trusts;

- Insurance policies;
- Mortgage information;
- Tax returns;
- Current financial specifics including W2s or 1099s;
- Information on current retirement plans and benefits provided by your employer;
- Statements reflecting current investments in retirement and non-retirement accounts; and
- Completed risk profile questionnaires or other forms provided by our firm.

It is important that the information and financial statements you provide are accurate. We may, but are not obligated to, verify the information you have provided which will then be used in the financial planning or investment advisory process.

Client Tailored Services and Client-Imposed Restrictions

Financial Planning and Investment Consultation Services

A description of our offered services is provided in the following paragraphs and an estimate of the time needed to complete each service is shown, although the time needed to complete these services may vary depending on the complexity of your engagement. Our services may be broad-based (sometimes coined “comprehensive planning”) or more narrowly focused as you desire. If several or all of the services described are provided together, the total time needed to complete these services may be less than the time it would take to complete each service separately because of the efficiency gained by combining more than one service.

Cash Flow and Debt Management (4-6 Hours)

We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

Risk Management (3-5 Hours)

Our services include an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care. Advice is provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential costs of not purchasing insurance (self-insuring).

We may consult with your insurance agent, other insurance agents or brokers and/or other insurance experts to assist you in making prudent risk management decisions, or perhaps guide you in your purchase of an appropriate policy. For example, we might recommend that you consider purchasing an “umbrella” insurance policy, or raise a deductible amount on an existing policy, which you should then discuss with your licensed insurance agent.

Employee Benefits (3-5 Hours)

We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible in your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

Retirement Planning (5-20 Hours)

Our retirement planning services typically include projections of your likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, we may make recommendations that include showing you the impact on those projections by making changes in certain variables (i.e., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

Tax Planning Strategies (1-3 Hours)

While Haven Financial Solutions, Inc. does not offer tax preparation, we can work with your tax professional to assist in structuring your financial life to identify tax-saving opportunities. For example, we will review whether a business owner has an appropriately structured business entity or if expenses are being managed in a tax efficient manner.

Our advice may also include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

College Financing (3-6 Hours)

Our college financing services often include projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren, if appropriate.

Estate Planning (3-5 Hours)

This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

Divorce Planning (General Review: 7-15 Hours)

A trained divorce planning specialist will work with you to help you gain an understanding of your unique situation and provide you with a realistic financial picture so that you are in a better situation to communicate with legal counsel, a mediator or soon to be ex-spouse. We will complete cash flow and net worth projections, budgetary analysis, division of property, as well as help you to understand what the consequences and/or benefits are involving a settlement.

Investment Consultation (4-10 Hours)

Our investment consultation services may involve providing information on the types of investment vehicles available, employee stock options, investment analysis and strategies, asset selection and portfolio design, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian (collectively, we term as “service providers”) of your choosing. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

Comprehensive v. Modular Planning

A comprehensive financial plan is an extremely individualized effort. Many variables can affect the cost of such a plan: quality and order of your personal records, complexity and number of current investments, diversity of insurance products and employee benefits, size of the potential estate, and special needs of the client or dependents, to name only a few. A basic comprehensive plan can require seven or more hours to complete; complex plans may require 19 hours or more. We will present you with a summary of our recommendations, guide you in the implementation of some or all of them, and recommend periodic financial reviews.

Alternatively, we may concentrate on reviewing only a specific area (modular planning), such as college financial planning, investment advice, second opinions on your portfolio allocation or investment options, or evaluating the quality and sufficiency of retirement planning. Note that when these services focus only on certain areas of your interest or need, however, your overall situation or needs may not be fully addressed due to limitations you may have established.

Under a Financial Planning and Investment Consultation engagement, the firm’s recommendations and services conclude upon delivery of the Firm’s advice or plan. You are always encouraged to contact our firm at any time in the future to re-engage our services.

Annual Review (4-10 Hours)

We strongly urge our clients to notify us of any change in their circumstances, and to schedule a review any time there is such a change. An annual review should be considered even if there is not a substantial change, because tax laws, estate laws, and insurance and investment products are rapidly evolving.

In all instances, you will retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make.

Educational Workshops

We provide educational workshops on an “as announced” basis for groups desiring general advice on investments and personal finance. Topics may include issues related to financial management, financial planning, retirement strategies, or various other economic and investment topics.

Our workshops are educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one person’s need nor do we provide individualized investment advice to attendees during our general sessions.

Investment Supervisory Services

You may also choose to engage our firm to implement the investment strategies we have recommended to you. Our investment supervisory services include, but are not limited to, the following:

- Investment strategy;
- Investment policy statement;
- Asset allocation;

- Asset selection;
- Risk tolerance; and
- Regular portfolio monitoring.

We generally employ a passive investment strategy and investment vehicles, such index funds, both of which are described in further detail in Item 8 of this brochure. We provide these services under a discretionary engagement agreement as defined in Item 16.

Whenever appropriate for your situation, we will assist you in preparing an investment policy statement (IPS), or similar document, reflecting your investment objectives, time horizon, tolerance for risk, as well as any account constraints. Your IPS will be designed to be specific enough to provide future guidance while concurrently allowing flexibility to respond to changing market conditions. Since the IPS will to a large extent be a product of information and data you have provided, you will be responsible for reviewing and providing final approval of the document/plan.

General Information

We do not provide legal, accounting or insurance services. With your consent, we may work with your other advisors (attorneys, accountant, etc.) to assist with coordination and implementation of accepted strategies. You should be aware that these other advisors will charge you separately for their services and these fees will be in addition to our advisory fees.

The Firm may assess additional fees due to time spent responding to a client's own legal actions/request, such as subpoenas, responding or meeting with legal counsel, depositions, court testimony, and travel to and from such locations; as well as reasonable and appropriate fees/costs involving printing, duplication and postage.

Our firm will use its best judgment and good faith effort in rendering its services. Haven Financial Solutions, Inc. cannot warrant or guarantee any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account.

Notwithstanding the preceding, nothing within our client agreement is intended to diminish in any way our fiduciary obligation to act in your best interest or in any way limit or waive your rights under federal or state securities laws or the rules promulgated pursuant to those laws.

Wrap Fee Programs

Our firm does not participate in or sponsor wrap fee investment management programs.

Client Assets Under Management

As of December 31, 2024, our firm had approximately \$12.8 million dollars of client assets¹ under management through discretionary account agreements (as defined in Item 16).

Item 5 - Fees and Compensation

Method of Compensation and Fee Schedule

Hourly Fees

Potential engagements begin with a 30-minute initial consultation as described in Item 4 of this brochure. The fee for this consultation is \$150, and that amount will be credited against an hourly or retainer engagement if you engage the firm for services within 30 days of the initial consultation.

Following the initial consultation, we may be engaged for our financial planning and investment consultation services under an hourly fee arrangement. Fees for these services are \$300 per hour. We require a one-hour minimum fee assessment for our financial planning and investment consultation services. Thereafter, you will be billed in one-minute increments, and a partial increment will be treated as a whole. Please review Item 4 for approximate charges for specific services.

Retainer Fees

We are typically engaged on a retainer fee basis for divorce planning engagements. The initial retainer fee is based upon the estimated time required to complete the engagement. Time will be assessed against the retainer at the firm's hourly rate billed in one-minute increments. Should the initial retainer be consumed, the Firm may require additional retainers in an amount deemed to be appropriate. Any part of the retainer that is not used will be refunded.

Workshop Fees

The sponsor of our educational workshops (non-profit group, employer, civic group, etc.) may impose a fee for the workshop and materials to pay Haven Financial Solutions, Inc. If there is a charge to the sponsor, it will include our regular hourly fee of \$300, the cost of materials, time spent in preparation, and any travel costs. If there is a charge to workshop attendees, the fee will be noted on the workshop announcement or invitation.

Asset-Based Fees

We assess an annualized asset-based fee for accounts for which we provide our investment supervisory services and they are calculated based on the reporting period end value and as noted in the following table.

¹ The term "assets under management" and rounding to the nearest \$100,000 are as defined by the SEC's 2010 *General Instructions for Part 2 of Form ADV*.

Investment Supervisory Services Fees

Assets Under Management	Annualized Asset-Based Fee
First \$1,000,000*	1.00% or 100 Basis Points
Next \$2,000,000	0.60% or 60 Basis Points
Assets over \$3,000,000	0.40% or 40 Basis Points

*Subject to a minimum annual fee of \$4,000.

For the benefit of discounting your asset-based fee, we may aggregate accounts for the same individual or two or more accounts within the same family, or accounts where a family member has power of attorney over another family member or incompetent person's account. Should, however, investment objectives be substantially different for any two or more household accounts requiring different investment approaches or operational requirements, we do reserve the right to apply our fee schedule separately to each account.

For all noted forms of advisory engagements with our firm, the services to be provided to you and their specific fees will be detailed in your engagement agreement. Our published fees are negotiable, but at the sole discretion of our firm. We strive to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered.

Client Payment of Fees

Hourly and Workshop Fees

Fees for our financial planning, investment consultation and educational workshops may be paid by check, bank draft, or single transaction debit card authorization through an unaffiliated third-party service. We do not accept cash, money orders, or similar forms of payment for our engagements. If you maintain an account at our selected custodian, you may authorize the custodian in writing to have these fees withdrawn from your account.

Fees are generally due upon your receipt of our invoice. Non-continuous service engagements that are greater than three months in duration will be billed quarterly, in arrears.

Retainer Fees

Retainer fees are to be paid in full at the beginning of the engagement. For extended engagements, the firm will send an invoice monthly and will indicate whether the retainer requires replenishment, and those fees will be due upon your receipt of our invoice. Fees may be paid by check, bank draft, or single transaction debit card authorization through an unaffiliated third-party service.

Asset-Based Fees

Annualized asset-based fees for investment supervisory services will be billed quarterly, in advance. An account's first billing cycle may occur once the agreement is executed and accounts are funded and this may be irrespective of a partial period under our management; however, a partial period will be assessed a pro-rated fee. Fee payments will generally be assessed within 10 business days following each billing cycle.

Accounts will be valued in accordance with the values disclosed on the statement the client receives from the custodian for the purpose of verifying the computation of the advisory fee. In the absence of a market value, we may seek an independent third-party opinion or a good faith determination by a qualified associate of our firm.

You will be required to authorize our firm in writing through the execution of our engagement agreement, as well as account opening documents of the selected custodian or broker/dealer ("service provider"), to deduct our advisory fees from your account. All fees will be clearly noted on your statements and we will send you written notice of the fees to be deducted from your account which will include the total fee assessed, covered time period, calculation formula utilized, and the assets under management on which the fee has been based.

Please note that you will be responsible for verifying the accuracy of the fee calculation; the custodian may not verify the accuracy for you.

Additional Client Fees

Any transactional or custodial fees assessed by selected service providers, individual retirement account fees or qualified retirement plan account termination fees will be borne by the accountholder and are per those provided in current, separate fee schedules of any selected service provider. Fees paid to our firm by our clients for our services are separate from any transactional charges a client may pay, as well as those for mutual funds, exchange-traded funds (ETFs), or other investments of this type. Interest at 10% per year will be assessed on client advisory fee balances more than 30 days past due.

Further information about our fees in relationship to our business practices are noted in Item 12 of this document.

Charged Prepayment of Client Fees

Advance Payment for Certain Services

We may require advance payment for our services in the following engagements: (1) an initial deposit of up to \$500 for our financial planning and investment consultation services, which will be defined in your engagement agreement; (2) retainer fees are due at the beginning of the engagement; (3) workshop fees are to be paid in advance of the first educational session; and (4) annualized asset-based fees for investment supervisory services will be billed quarterly, in advance.

Termination of Services

Either party may terminate the agreement at any time, which will typically be in writing. Should you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute.

If you are a new client, you may terminate an agreement with our firm within five business days after the signing of our engagement agreement without penalty or charge. Should you terminate an engagement after this date, you may be invoiced for any time charges incurred by our firm in the preparation of your financial plan, investment allocation, or divorce planning case. We will promptly return any unearned amount of prepaid fees upon receipt of a written termination notice. However, should an educational workshop attendee cancel within 48 hours of the first session, fees will not be subject to a refund.

For those clients for whom we provide investment supervisory services, our firm will not be responsible for future allocations, transactional services or investment advice upon receipt of a termination notice. Further, upon termination, it will be necessary that we promptly inform the account custodian that the advisory

relationship between the firm and the client has been terminated and that our firm will no longer be supervising the account.

External Compensation for the Sale of Securities to Clients

Our firm and its associates are engaged for fee-only services and we attempt to recommend “no load” investments whenever appropriate. We do not charge or receive a commission or mark-up on your securities transactions, nor will the firm and our associates be paid a commission on your purchase of an insurance contract or securities investment that we recommend.

We do not receive “trailer” or SEC Rule 12b-1 fees from an investment company we may recommend. Fees charged by issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

You will always have the option to purchase recommended or similar investments through a service provider of your choice.

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

Our fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as “performance-based fees.” Performance-based compensation creates an incentive for a firm or their representatives to recommend an investment that may carry a higher degree of risk to a client. We do not use a performance-based fee structure because of the conflict of interest this type of fee structure poses.

Our fees will not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it may pose, does not conform to our firm’s practices.

Item 7 - Types of Clients

We provide our advisory services to individuals, as well as their trusts or estates to assist in meeting financial objectives in what we believe to be a cost-effective way. Our ability to provide our services depends on access to important information. Accordingly, it is necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including but not limited to source of funds, income levels, your (or your legal agent’s) authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our financial planning or investment strategy for you.

It is also very important that you keep us informed on significant changes that may call for an update to your financial and investment plans. Events such as job changes, retirement, a windfall, marriage or divorce, or the purchase or sale of a home or business can have a large impact on your circumstances and needs. We need to

be aware of such events, so we can make the adjustments needed to your plan or advice in order to keep you on track toward your goals.

Our firm does not require minimum income levels, minimum level of assets or other conditions for our financial planning and investment consultation services. We require a \$4,000 minimum annual fee for our investment supervisory services engagements paid in advance each quarter in equal installments.

We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or pre-existing relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

Methods of Analysis and Investment Strategies

Method of Analysis

If we are engaged to provide investment advice, we will first gather and consider several factors, including your:

- current financial situation,
- current and long-term needs,
- investment goals and objectives,
- level of investment knowledge,
- tolerance and appetite for risk, and
- restrictions, if any, on the management of your portfolio.

We generally employ a fundamental analysis which involves evaluating economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. In addition to our own research, the firm's recommendations may also be drawn from research sources that include financial publications, investment analysis and reporting software, materials from outside sources, annual reports, prospectuses and other regulatory filings, and company press releases.

We make asset allocation and investment policy decisions based on the above-noted elements and any other reasonable requirements you may prescribe. We will discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

Investment Strategies

We do not engage in market timing, technical analysis, or selection of individual equities. We favor a long-term buy and hold strategy with periodic rebalancing of the portfolio among asset classes, often termed *passive investing*. We invest based on both life stage and investor risk tolerance. We have four categories of risk tolerance:

- *Aggressive* - Generally suitable for investors younger than 50 years old who are in the "accumulation phase" of managing their assets; or for those who are very risk tolerant, who have a significant guaranteed income (pensions or annuities), or with a long time horizon before their portfolio must be tapped.

- *Moderately Aggressive* - Generally suitable for investors between the ages of 50-60, who are still in the “accumulation phase” but moving closer to retirement age; or for those who are willing to take some risk for the possibility of capital improvement. This is for people who will need to tap their portfolio in 5 to 15 years.
- *Moderately Conservative* - Generally suitable for investors between the ages of 60-70, who are concerned with capital preservation but want or need to see some capital appreciation in their portfolios. This is for people who will need to withdraw sums from their portfolio within five years.
- *Conservative* - Investors over 70 or those who must preserve assets while still managing inflation. This is a portfolio which is being accessed for current income needs.

We strongly believe that the sensible and reasonable approach to investing is a strategic allocation of assets to indexed mutual funds or exchange traded funds, spread across a variety of investment types. We recommend either a streamlined version, with easily understood categories and easy implementation, or for those with a larger portfolio of investable assets, a more diverse asset allocation formula of 10 or more different investments spread over diverse types of stock and bond allocations. Depending on your experience and interests, we’ll work with you to implement the right plan for your aims, needs and interests.

We do not, however, manage individual securities. While you are certainly free to manage such a portfolio for yourself, we believe that the core of a solid portfolio is mutual funds and ETFs. All assets placed with us for management will be reallocated into an appropriate portfolio.

Investment Strategy and Method of Analysis Material Risks

Investment Strategy Risks

We believe our strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, we cannot guarantee that an investment objective or planning goal will be achieved. As an investor you must be able to bear the risk of loss that is associated with your account, which may include the loss of some or all of your principal.

In general, risks regarding markets include interest rates, company, and management risk, among others. Examples include:

Market Risk – When the stock market as a whole or an industry as a whole fall, it can cause the prices of individual stocks to fall indiscriminately. This is also called systemic risk.

Company Risk – When investing in securities, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry.

Management Risk – An investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.

Firm Research – When the firm’s research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, the firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. The firm makes every effort to determine the accuracy of the information received but it cannot predict the outcome of events or actions taken or not taken, or the validity of all information it has researched or provided, which may or may not affect the advice on or investment management of an account.

Fundamental Analysis – The risk involved in employing fundamental analysis is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security’s value. If a security’s price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

Passive Markets Theory – A portfolio that employs a passive, efficient markets approach (often associated with index investing) has the potential risk that at times the broader allocation may generate lower-than-expected returns than those from a specific, more narrowly focused asset, and that the return on each type of asset is a deviation from the average return for the asset class. We believe this variance from the “expected return” is generally low under normal market conditions when a portfolio is made up of diverse, non-correlated assets.

Security-Specific Material Risks

ETF and Mutual Fund Risk – ETFs or mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. The risk of owning an ETF or mutual fund also generally reflects the risks of their underlying securities. *Fixed Income Risks* – Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including:

- *Interest Rate Risk* - The risk that the value of the fixed income holding will decrease because of an increase in interest rates.
- *Liquidity Risk* - The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading on any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.
- *Credit Risk* - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as “default risk.” Credit risk may also occur when an issuer’s ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF/ETN share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.
- *Reinvestment Risk* – With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

- **Duration Risk** - Duration is a measure of a bond's volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

Index Investing – ETFs and indexed funds have the potential to be affected by “active risk” or “tracking error risk,” which might be defined as a deviation from the stated benchmark. Since the core portfolio may attempt to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a “sample” or “optimized” index fund or ETF that may not as closely align with the stated benchmark. In these instances, the firm may choose to reduce the weighting of a satellite holding, utilize very active satellites, or use a “replicate index” position as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

QDI Ratios – While many ETFs and index mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF or mutual fund portfolio), may be considered “non-qualified” under certain tax code provisions. We consider a holding's QDI when tax-efficiency is an important aspect of the client's portfolio.

Item 9 - Disciplinary Information

Neither the firm nor any member of its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our firm's advisory business or the integrity of our firm.

Item 10 - Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Neither Haven Financial Solutions, Inc. nor a member of firm management is registered, or has an application pending to register, as a broker/dealer or a registered representative of a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) broker/dealer.

Futures or Commodity Registration

Neither Haven Financial Solutions, Inc. nor a member of firm management is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Our policies require our firm and its associates to conduct business activities in a manner that avoids actual or potential conflicts of interest between the firm, its employees and clients, or that may be contrary to law. We will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise our impartiality or independence.

Neither Haven Financial Solutions, Inc. nor a member of our firm's management is or has a material relationship with any of the following types of entities:

- municipal securities dealer or government securities dealer or broker;
- banking or thrift institution;
- accountant or accounting firm;*
- lawyer or law firm;*
- insurance company or agency;*
- pension consultant;
- real estate broker or dealer;
- sponsor or syndicator of limited partnerships; or
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund).

*Upon your request, we may provide referrals to various professionals, such as an attorney or accountant. We do not have an agreement with or receive fees from these professionals for these informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by our firm.

Recommendation or Selection of Other Investment Advisors and Conflicts of Interest

We do not provide recommendations to or make selection of other investment advisors or third-party registered investment advisor firms for your account.

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

We have adopted a Code of Ethics that establishes policies for ethical conduct for all our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Our policies include prohibitions against insider trading, among others.

Code of Ethics Description

Associates of our firm who are CERTIFIED FINANCIAL PLANNER^{STM}, CFP[®] Professionals or Financial Planning Association (FPA) member also adhere to the Certified Financial Planner Board of Standards, Inc.’s Code of Ethics.

These principles include:

Principle 1 – Integrity

An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage.

Advisors are placed by clients in positions of trust by clients, and the ultimate source of that trust is the advisor’s personal integrity. Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one’s principles.

Principle 2 – Objectivity

An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence

Advisors will maintain the necessary knowledge and skill to provide professional services competently.

Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness

Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests.

Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 – Confidentiality

Advisors will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism

Advisors will act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence

Advisors will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Associates of our firm who are members of the Garrett Planning Network, Inc. also adhere to the National Association of Personal Financial Planners (NAPFA) *Fiduciary Oath* that states that:

"The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client. The advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will or reasonably may compromise the impartiality or independence of the advisor. The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product. The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.

Following the NAPFA Fiduciary Oath means I shall:

- * Always act in good faith and with candor.*
- * Be proactive in disclosing any conflicts of interest that may impact a client.*
- * Not accept any referral fees or compensation contingent upon the purchase or sale of a financial product."*

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually.

Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

Privacy Policy Statement

As an independent financial planning firm, Haven Financial Solutions, Inc. is committed to safeguarding the confidential information of all current, former, and potential clients.

All personal information provided to our firm is held in the strictest confidence. These records include personal information we collect from you in connection with any services or potential services provided by our firm. We have never disclosed information to nonaffiliated third parties, except as required by law or by your consent, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first.

We use your information in helping you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy.

Our policy with respect to personal information about you is listed below:

Information Kept Private; Sharing Limited to Need to Know

Access to your information is limited. Only employees and agents who have a business or professional reason for knowing your information are allowed access.

We do not share information with nonaffiliated parties except as required or permitted by law or by your consent. For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. For example, federal and state regulators may review firm records as permitted under law. Federal regulations permit us to share a limited amount of information about you so that our firm can discuss your financial situation with your accountant or lawyer.

We do not provide your personally identifiable information to mailing list vendors or solicitors.

Secure Environment

We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.

Categories of Information Collected

The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. These categories may include information:

- about your personal finances and insurance;
- about your personal goals, dreams, and health to the extent needed for the planning process;
- about transactions between you and third parties; and
- from consumer reporting agencies.

Maintenance of Information

Personally identifiable information about you will be maintained during the time you are a client, and for the required time that such records are required to be maintained by federal and state securities laws, and consistent with the CFP Board Code of Ethics and Professional Responsibility.

We will provide you with our privacy policy on an annual basis per federal law and at any time, in advance, if our policy is expected to change.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm nor its associates are authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a “related person” (associates, their immediate family members, etc.) has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

Our employees are prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

Our firm is able to provide a broad range of services to you and all of our clients, including financial planning, investment consultation, investment supervisory services, among others; we may be paid a fee for all of these services. Due to our firm’s ability to offer two or more of these services and possibly receive a fee for each engagement, a potential conflict of interest may exist. Therefore, we note that you are under no obligation to act on our recommendations and, if you elect to do so, you are under no obligation to complete all of them through our firm or our recommended service providers.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its related persons may buy or sell securities that are the same as, similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific securities transactions. Any exceptions or trading pre-clearance must be approved by our firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

See responses in the section *Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest*.

Item 12 - Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Haven Financial Solutions, Inc. does not maintain custody of any of your assets (see Item 15). Your assets must be maintained in an account at a "qualified custodian" (generally a broker/dealer or bank) that is frequently assessed for its capabilities to serve as a custodian by their respective industry regulatory authority. Our firm is not a custodian nor do we have an affiliate that is a custodian.

When engaged to provide investment consultation services, we may recommend the service provider with whom your assets are currently maintained. Should you prefer a new service provider, our recommendation of another service provider would be based on your needs, overall cost, and ease of use.

If you have engaged our firm to provide its investment supervisory services, we frequently recommend our clients use the institutional services division of Shareholder Services Group ("Shareholder Services Group") of San Diego, California, a FINRA and SIPC² member. As stated earlier, our firm is independently owned and operated and is not affiliated with the brokerage firm Shareholder Services Group or any other industry entity we may recommend. Broker does not supervise the advisor, its agents or activities.

Shareholder Services Group will hold your assets in an account in your name and will buy and sell securities when we instruct them to do so. While we recommend that you use Shareholder Services Group as your service provider, you must decide whether to do so and your account with Shareholder Services Group will be entered

² Haven Financial Solutions, Inc. is not a Securities Investor Protection Corporation (SIPC) member firm due to SIPC membership guidelines. You may learn more about the SIPC and how it serves member firms and the investing public by going to their website at <http://www.sipc.org>.

into via an account agreement directly with them. We technically do not open the account for you, although we will assist you in doing so.

The institutional platform services Shareholder Services Group provides us include, among others, brokerage, custody, and other related services. Shareholder Services Group services assist us in managing and administering clients' accounts include software and other technology that:

- provide access to client account data (such as trade confirmations
- and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide limited research, securities pricing and other market data;
- facilitate payment of fees from clients' accounts;
- online document storage of client accounts held at Shareholder Services Group; and
- assist with certain back-office functions, recordkeeping and client reporting.

Shareholder Services Group also offers other services intended to help the firm manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, industry publications, access to educational conferences and webinars, access to other third-party service providers that provide a wide array of business-related services and technology with whom the firm may directly contract.

Many of Shareholder Services Group's services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us as long as our firm maintains client account assets with Shareholder Services Group. We are not required to maintain a collective minimum asset level, however, Shareholder Services Group does charge accountholders transaction-related fees for securities trades executed through their firm, which is noted in their current fee schedule.

Shareholder Services Group provides our firm with certain brokerage and research products and services that may qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from Shareholder Services Group benefits us because we do not have to separately produce or purchase them. We may not be required to pay for these services as long as our clients maintain assets in accounts with Shareholder Services Group. Beyond that, these services are not contingent upon us committing any specific amount of business to Shareholder Services Group in trading commissions or assets in custody. This remains a potential conflict of interest but we believe our selection of Shareholder Services Group as custodian is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Shareholder Services Group's services to our clients, and not Shareholder Services Group's services that benefit only our firm.

We periodically conduct an assessment of any service provider we recommend, including Shareholder Services Group, which typically includes a review of their range of services, reasonableness of fees, among other items, and in comparison to their industry peers.

Best Execution

Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed in the previous section. We recognize our obligation in seeking "best execution" for our clients; however, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected service provider's transactions represent the best "qualitative" execution while taking into consideration the full range of services provided. Therefore, we will seek services involving competitive rates but it may not

necessarily result in the lowest possible rate for each transaction. We have determined that having Shareholder Services Group execute our trades is consistent with our duty to seek "best execution."

We periodically review policies regarding our recommending service providers to our clients in light of our duty to seek "best execution."

Directed Brokerage

We do not require or engage in directed brokerage activities involving our transactions for our client's accounts in which we provide our advisory services.

You may direct our firm to use another particular broker-dealer or custodian to execute some or all transactions for your account. In these circumstances, you will be responsible for negotiating, in advance, the terms and/or arrangements for your account with your selected service provider.

We will not be obligated to seek better execution services or prices from these other service providers or able to aggregate your transactions, should we choose to do so, for execution through other custodians with orders for other accounts managed by our firm. As a result, you may pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices, on transactions for your account than would otherwise be the case.

Pursuant to our obligation of best execution, we may decline a request to direct brokerage if we believe any directed brokerage arrangement would result in additional operational difficulties or risk to our firm.

Trade Errors

The firm corrects all trade errors through a Trade Error Account maintained by the firm's custodian, and the firm will be responsible for any losses in accounts. Likewise, the firm may also receive any gains resulting from the correction of any trade errors and, therefore, may potentially receive a benefit from this arrangement.

Accounts Aggregating Securities Transactions for Client

Transactions for each of our clients will generally be effected independently unless we decide to purchase or sell the same securities for several clients at approximately the same time, often termed "aggregated" or "batched" orders. We do not receive any additional compensation or remuneration as a result of aggregated transactions.

We may, but are not obligated to, aggregate orders in an attempt to obtain better execution, negotiate favorable transaction rates, or to allocate equitably among our client accounts should there be differences in prices and commissions or other transaction costs that might have been obtained had such orders been separately placed.

Should we aggregate orders, transactions will generally be averaged as to price and allocated among each client on a pro-rated basis on any given day and we will attempt to do so in accordance with the parameters set forth in SEC No-Action Letter, *SMC Capital, Inc.*

Client accounts where trade aggregation is not allowed or infeasible may potentially be assessed higher transaction costs than those that are batched.

We review both our trade aggregation procedures and allocation processes on a periodic basis to ensure they remain within stated policies and regulation. We will inform you, in advance, should our trade aggregation and allocation practices change at any point in the future.

Item 13 - Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Financial Planning and Investment Consultation Services

You should contact our firm for additional reviews when making decisions about changes in your financial situation (i.e., the loss of a job, retirement, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances).

Periodic financial check-ups or reviews are recommended if you are receiving our financial planning and investment consultation services, and we recommend that they occur at least on an annual basis whenever practical. We encourage you to schedule these meetings in advance or we may contact you to determine an appropriate date to schedule the review.

Reviews will be conducted by your selected financial planner and normally involve analysis and possible revision of your previous financial plan or investment allocation. A copy of revised plans or asset allocation reports will be provided to the client upon request.

Unless stated to the contrary in your engagement agreement, reviews are generally conducted under a new or amended agreement and will be assessed at our current hourly rate.

Investment Supervisory Services

Investment supervisory services accounts are reviewed on a quarterly or more frequent basis by your selected representative and supervisory personnel. A copy of revised IPS or asset allocation reports will be provided to the client upon request.

Additional reviews may be triggered by news or research related to a specific holding, a change in our view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector. Accounts may also be reviewed for an additional holding, when an increase in a current position is under consideration, or when account cash levels above or below what we deem appropriate for the investment environment given the client's stated tolerance for risk and investment objectives.

Review of Client Accounts on Non-Periodic Basis

Financial Planning and Investment Consultation Services

You are free to contact our firm for additional reviews when there are material changes that occur in your financial situation (i.e., loss of a job, early retirement, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances).

Unless stated to the contrary in your engagement agreement, reviews are generally conducted under a new or amended agreement and will be assessed at our current hourly rate.

Investment Supervisory Services

Additional reviews may be triggered by news or research related to a specific holding, a change in our view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector.

Accounts may also be reviewed when being considered for an additional holding or an increase in a current position.

Account cash levels above or below that deemed appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

Content of Client Provided Reports and Frequency

If you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. We urge you to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear.

We may provide portfolio reports if we are engaged to provide periodic asset allocation or investment advice; however, we do not provide ongoing performance reporting under our financial planning, investment consultation or portfolio monitoring services engagements.

For our investment supervisory services accounts, our firm may provide quarterly portfolio statement and position performance summary reports, and annual realized gains/loss reports for taxable accounts. Some of our clients may receive additional reports depending on their specific requirements.

All firm performance reports (if any are provided) will be in prepared in accordance with appropriate jurisdictional guidance. Clients are urged to carefully review and compare account statements that they have received directly from their service provider with any report received from our firm.

Item 14 - Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

We receive an economic benefit from Shareholder Services Group 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 Shareholder Services Group. These products and services, how they benefit us, and the related conflicts of interest are described above (see *Item 12*). The availability to us of Shareholder Services Group's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Advisory Firm Payments for Client Referrals

We do not engage in solicitation activities as defined by state statute.

Haven Financial Solutions, Inc. and/or the firm's principal hold memberships in professional membership organizations including NAPFA, the Garrett Planning Network, Inc., The Institute of Divorce Financial Analysts, and others. These organizations are not registered financial industry participants; however, we do pay an annual

membership fee for services that may include training, compliance and operational support to enhance our ability to provide quality service and advice to the investing public.

Investment advisor representatives of our firm may also hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities requires membership fees to be paid, adherence to ethical guidelines, as well as meeting experiential and educational requirements.

A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for participant firms or individual financial planners within a selected state or region. These passive websites may provide means for interested persons to contact a firm or planner via electronic mail, telephone number, or other contact information, in order to interview the participating firm or planner. Members of the public may also choose to telephone association staff to inquire about a firm or individual planner within their area, and would receive the same or similar information. A portion of our membership fees may be used so that our name will be listed in some or all of these entities' websites (or other listings).

Prospective clients locating our firm or one of our associates via these methods are not actively marketed by the noted associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.³

Item 15 - Custody

Your funds and securities will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer, mutual fund companies, or transfer agent. Your assets are not held by our firm or any of our associates. In keeping with our policy of not having custody of our client funds or securities, we:

- Restrict the firm or an associate from serving as trustee or having general power of attorney over a client account;
- Prohibit any associate from having authority to directly withdraw securities or cash assets from a client account. Advisory fees will only be withdrawn from a client investment account through engagement of a qualified custodian maintaining client account assets, via written client approval;
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future; and
- Will not authorize an associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) when such access might result in physical control over client assets.

You will be provided with transaction confirmations and summary account statements provided directly to you by your selected service provider, such as your custodian of record. Typically, statements are provided on at

³ Our firm believes this arrangement is in consonance with SEC No-Action Letter No. 1251421 in its response to the National Football League Players Association.

least a quarterly basis or as transactions occur within your account. We will not create a statement for you nor be the sole recipient of account statements.

Should you receive periodic reports from our firm that includes investment performance information, you are urged to carefully review and compare your account statements that you have received directly from your service provider with any report from our firm.

Advisor is not affiliated with the custodian. The custodian does not supervise the advisor, its agents or activities.

Item 16 - Investment Discretion

We provide our various forms of investment advisory services (*as described in Item 4*) under either *discretionary* or *non-discretionary* account authority, and as determined by your written engagement agreement. Generally, we prefer to serve investment supervisory services accounts under a discretionary authority engagement.

Similar to a limited power of attorney, discretionary authority allows our firm to implement investment decisions, such as the purchase or sale of a security on behalf of your account, without requiring your prior authorization for each transaction in order to meet your stated account objectives.

Should you prefer your account to be managed in a non-discretionary manner, your prior approval must be made for each transaction with regard to the investment and reinvestment of account assets or for the firm to give instructions to the service provider maintaining your account. The service provider will specifically limit the firm's authority in the account to the placement of trade orders and the deduction of advisory fees. In light of the requirement for your pre-approval, you must make yourself available and keep us updated on your contact information so that instructions can be efficiently effected on your behalf.

We will retain information about all client account directions, limitations and rescissions that are reviewed and approved by a supervisory principal with our firm.

Item 17 - Voting Client Securities

Proxy Voting

Our firm does not vote proxies on your behalf nor do we offer guidance on how to vote proxies. You will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to your holdings.

Other Corporate Actions

We will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

Receipt of Materials

You may receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should we receive a duplicate copy, note that we do not generally forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

Item 18- Financial Information

Balance Sheet

With the exception of our having the ability to withdraw our advisory fees through the services of a qualified, unaffiliated third party and per your prior written authorization, we will not take custody of your assets (as described in Item 15). This includes our policy of not collecting fees from you of \$500 or more for services we will perform six months or more in advance.

Neither the firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

Due to the nature of our firm's services and operational practices, an audited balance sheet is not required nor included in this brochure.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

The firm and its management do not have a financial condition likely to impair our ability to meet our commitment to our clients.

Bankruptcy Petitions during the Past 10 Years

The firm and its management have not been the subject of a bankruptcy petition at any time during the past 10 years.

Item 19 - Requirements for State-Registered Advisers

Principal Executive Officers and Management Persons

Designated Principal (Supervisor)/Sole Shareholder/Investment Advisor Representative

Danielle Loretta Schultz (Born 1953)

Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm through the ADV Part 2A and/or ADV Part 2B (Brochure Supplement), as well as their business experience for at least the past five years.

Educational Background

CERTIFIED FINANCIAL PLANNER™ (CFP®)⁴ - Certified Financial Planner Board of Standards, Inc.
Certificate, CERTIFIED FINANCIAL PLANNER™ Program - Northwestern University (2010)
Certified College Planning Specialist (CCPS)⁵ - National Institute of Certified College Planners (2010)
Certified Divorce Financial Analyst™ (CDFA®)⁶ - The Institute of Divorce Financial Analysts (2012)
Uniform Investment Adviser State Law Examination/NASAA Series 65
Master of Arts, School of Social Service Administration - University of Chicago (1977)
Bachelor of Arts, *magna cum laude*, Sociology - Northeastern Illinois University (1975)

Business Experience

Principal, Haven Financial Solutions, Inc. (2010-Present)
Contributing Editor, Better Investing Magazine (2018-2022)
Freelance Writer, specializing in Corporate Communications, Features & Books (1985-Present)
Real Estate Broker (1986-1993)

Other Business Activities

The above-mentioned other business activities do not present material conflicts of interest for the financial planning and investment advice services that are provided by Ms. Schultz as the principal of Haven Financial Solutions, Inc.

She is not actively engaged in another *investment-related* business or occupation; she not registered nor has an application pending to register as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. Therefore, Ms. Schultz does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products, including that as a registered representative of a broker/dealer, and including distribution or service (“trail”) fees from the sale of mutual funds.

Additional Compensation

Ms. Schultz is not compensated for advisory services involving performance-based fees, nor does she or the firm have a material relationship involving an issuer of a security.

Our firm also prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

⁴ The **CERTIFIED FINANCIAL PLANNER™**, **CFP®** and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

⁵ The **Certified College Planning Specialist (CCPS)** Program is offered through the National Institute of Certified College Planners whose mission is to provide recognition and support to the thousands of experienced professionals from around the country who devote a significant portion of their practices to helping families plan financially for college. The program contains three modules that candidates are tested: *Saving for College*, *Paying for College*, and *Advanced College Funding Strategies*. Once certified, all designees are required to obtain 24 hours of continuing education credits per year and pay an annual CCPS certification renewal fee to maintain their designation in good standing.

⁶ The **Certified Divorce Financial Analyst™** (CDFA®) is offered through The Institute of Divorce Financial Analysts and requires two years of financial services industry experience, the completion of a self-study course and computer-based examination. Every two years, designation holders must complete 20 hours of continuing education and pay requisite fees to retain the CDFA™ designation.

Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no criminal or civil actions, administrative enforcement proceedings, self regulatory organization enforcement proceedings or any other proceedings applicable to Haven Financial Solutions, Inc., or Danielle L. Schultz.

Supervision

Danielle L. Schultz serves in multiple capacities for Haven Financial Solutions, Inc.: Principal, Financial Planner and Investment Advisor Representative (IAR). We recognize that the lack of segregation of duties may potentially create conflicts of interest. However, we employ policies and procedures to ensure timely and accurate recordkeeping and supervision, including outsourcing certain functions to qualified entities to assist in these efforts when necessary. Questions relative to our firm, its services or this ADV Part 2 may be made to the attention of Ms. Schultz at (847) 864-2761 or dschultz@HavenFinancialSolutions.com.

Additional information about the firm, other advisory firms, or an associated investment advisor representative, including Ms. Schultz, is available on the Internet at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and then search for "Danielle L. Schultz" under the "Investment Adviser Representative" feature. A search of this site for firms can also be accomplished by firm name or a unique firm identifier, known as an IARD number. The IARD number for Haven Financial Solutions, Inc. is 156422.

The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Illinois Securities Department at (800) 628-7937.

Requirements for State-Registered Advisers

There have been neither arbitration awards nor any awards where Haven Financial Solutions, Inc. has been found liable in any civil, self-regulatory or administrative proceeding. Haven Financial Solutions, Inc., and Danielle L. Schultz has never been the subject of any bankruptcy petition.

Professional Designations

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and

- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.