



# Hamilton Financial Planning LLC

**1202 Lakeway Dr. Suite 7**

**Lakeway, TX 78734**

**(512) 261-0808**

**January 3, 2024**

This Brochure provides information about the qualifications and business practices of Hamilton Financial Planning LLC. If you have any questions about the contents of this Brochure, please contact us at (512)-261-0808 or via email at [scott@hamiltonfinancialplanning.com](mailto:scott@hamiltonfinancialplanning.com). 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.

Hamilton Financial Planning LLC is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information that you may use to determine whether to hire or retain them. Additional information about Hamilton Financial Planning LLC is also available on the SEC's website at <http://www.adviserinfo.sec.gov>.

## Item 2 – Material Changes

---

We did not make any material changes and made the following non-material change since our last filing on January 2, 2024:

- We updated Item 4 to include information on assets under management.

## Item 3 – Table of Contents

---

### Contents

<b>Item 2 – Material Changes</b> .....	<b>2</b>
<b>Item 3 – Table of Contents</b> .....	<b>3</b>
<b>Item 4 – Advisory Business Introduction</b> .....	<b>5</b>
Services .....	5
1. Wealth Management .....	5
2. Financial Planning.....	7
3. Third-Party Money Management Services.....	7
4. Held Away Accounts.....	8
5. Assets under Management .....	8
<b>Item 5 – Fees and Compensation</b> .....	<b>8</b>
1. Wealth Management Services .....	8
2. Financial Planning Services.....	9
3. Third-Party Money Managers .....	9
4. Held Away Accounts.....	10
<b>Item 6 – Performance Based Fee and Side by Side Management</b> .....	<b>10</b>
<b>Item 7 – Types of Client(s)</b> .....	<b>10</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>10</b>
1. Fundamental Analysis .....	10
2. Modern Portfolio Theory (MPT).....	11
3. Risks.....	12
<b>Item 9 – Disciplinary Information</b> .....	<b>14</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations</b> .....	<b>14</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading</b> .....	<b>15</b>
1. General Information.....	15
2. Participation or Interest in Client Accounts .....	15
3. Personal Trading.....	15
4. Privacy Statement .....	16
<b>Item 12 – Brokerage Practices</b> .....	<b>16</b>
1. Best Execution .....	<b>Error! Bookmark not defined.</b>
2. Brokerage for Client Referrals.....	18
3. Directed Brokerage .....	18

4. Trading.....	18
<b>Item 13 – Review of Accounts.....</b>	<b>19</b>
1. Reviews.....	19
<b>Item 14 – Client Referrals and Other Compensation .....</b>	<b>19</b>
<b>Item 15 – Custody .....</b>	<b>19</b>
<b>Item 16 – Investment Discretion.....</b>	<b>20</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>20</b>
<b>Item 18 – Financial Information .....</b>	<b>20</b>
<b>Item 19 – Requirements for State Registered Advisers .....</b>	<b>20</b>
<b>ADV Part 2B Brochure Supplement – Scott Hamilton.....</b>	<b>22</b>
Item 1 – Cover Page .....	22
Item 2 – Educational Background and Business Experience.....	23
Item 3 – Disciplinary History .....	24
Item 4 – Other Business Activities .....	24
Item 5 – Additional Compensation .....	24
Item 6 – Supervision.....	24
Item 7 – Requirements for State-Registered Advisers.....	24

## Item 4 – Advisory Business Introduction

---

Hamilton Financial Planning LLC is a Registered Investment Advisor (“Advisor”) which offers financial planning and investment advice to clients.

Hamilton Financial Planning LLC was founded in 2011 by Scott Hamilton who serves as a Managing Member and Chief Compliance Officer. We provide management services and financial planning to individuals, high net worth individuals and small businesses.

We are committed to the precept that by placing the client’s interests first, we will add value to the financial planning process and earn the client’s trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

### Services

We provide financial planning services and wealth management, with an emphasis on business and retirement planning and services. Our focus is on helping you develop and execute plans that are designed to build and preserve your wealth.

Our clients may engage us for financial planning, investment management or both. Clients will not be required to implement our recommendations through us.

We do not participate in wrap fee programs.

### 1. Wealth Management

Wealth management is a holistic approach incorporating financial planning and behavioral finance into professional management of securities (stocks, bonds and other securities) and assets (e.g., real estate) in order to meet your specified investment goals.

We will meet with you to develop a financial plan based on your financial circumstances, investment goals and objectives, and determined risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us, we will analyze your situation and develop an investment plan with recommendations for an appropriate asset allocation or investment strategy. Our recommendations and ongoing management are based upon your investment goals and objectives, risk tolerance, and the investment portfolio you have selected. We will monitor the account, trade as necessary, and communicate regularly with you. Your circumstances shall be monitored in quarterly and annual account reviews. These reviews will be conducted in person, by telephone conference, and/or via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

With an Wealth Management Account, you engage us to assist you in developing a custom-tailored portfolio designed to meet your unique investment objectives outlined in your investment plan. The

investments in the portfolio account may include mutual funds, stocks, bonds, equity options, futures, etc.

We will:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, periodic rate of return reports, asset allocation statement, and rebalanced statements as needed
- Advise on asset selection
- Determine market divisions through asset allocation models
- Provide research and information on performance and fund management changes
- Build a risk management profile for you
- Assist you in setting and monitoring goals and objectives
- Provide personal consultations as necessary upon your request or as needed.

You are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not indicative of future results.

If you decide to implement our recommendations, we will help you open a custodial account(s). The funds in your account will be held in a separate account, in your name, at Charles Schwab & Co., (“Schwab”), and not with us.

You will enter into a separate custodial agreement with Schwab which authorizes Schwab to take instructions from us regarding all investment decisions for your account. We will select the securities bought and sold and the amount to be bought and sold, within the parameters of the objectives and risk tolerance of your account. You will be notified of any purchases or sales through trade confirmations and statements that are provided by the Schwab. These statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

We manage assets on a discretionary basis, which means you have given us the authority to determine the following with/without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account

Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professionals to assist you with tax planning.

We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

## **2. Financial Planning**

We provide services such as comprehensive financial planning and business planning on a limited engagement basis. Financial planning is a comprehensive relationship which incorporates many different aspects of your financial status into an overall plan that meets your goals and objectives. The financial planning relationship consists of face-to-face or remote access meetings and ad hoc meetings with you and/or your other advisors (attorneys, accountants, etc.) as necessary.

In performing financial planning services, we typically examine and analyze your overall financial situation, which may include issues such as taxes, insurance needs, overall debt, credit, business planning, retirement savings and reviewing your current investment program. Our services may focus on all or only one of these areas depending upon the scope of our engagement with you.

It is essential that you provide the information and documentation we request regarding your income, investments, taxes, insurance, estate plan, etc. We will discuss your investment objectives, needs and goals, but you are obligated to inform us of any changes. We do not verify any information obtained from you, your attorney, accountant or other professionals.

If you engage us to perform these services, you will receive a written agreement detailing the services, fees, terms and conditions of the relationship. You will also receive this Brochure.

We obtain information from a wide variety of publicly available sources. We do not have any inside private information about any investments that are recommended. All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations. Choosing which advice to follow is your decision.

## **3. Third-Party Money Management Services**

We may recommend third-party money managers (“TPMMs”) to manage part or the client’s entire portfolio. TPMMs may be recommended when the TPMMs’ philosophy, investment strategy, and style

meet the client's financial situation, investment objectives, and risk tolerance. The asset management services provided by the TPMMs, the compensation to be paid, and other terms of the relationship between the client and the TPMMs will be described in the TPMMs' disclosure documents and its managed account agreement. We will receive a portion of the investment advisory fee paid by the client to the TPMMs.

#### 4. Held Away Accounts

We provide an additional service for accounts not directly held in our custody, but where we do have discretion, and may leverage an Order Management System to implement tax-efficient asset location and opportunistic rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, HSA's, and other assets we do not custody. We regularly review the available investment options in these accounts, monitor them, and rebalance and implement our strategies in the same way we do other accounts, though using different tools as necessary

#### 5. Assets under Management

As of December 31, 2023, our firm managed \$ 43,959,679.00 on a discretionary basis. We do not have any non-discretionary assets under management.

### Item 5 – Fees and Compensation

---

We provide wealth management and financial planning services for a fee. Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses that may be imposed by custodians and other third parties that may be recommended in your financial plan.

#### 1. Wealth Management Services

We currently do not have a minimum account balance; however, we have a minimum quarterly charge of \$1000. This is subject to change at the discretion of the Firm. We will bill for these services quarterly as specified in the client's agreement.

Amount of Assets	Invested Annual Fee
\$0 - \$749,999.99	0.85 of one percent (85 basis points)
\$750,000 to \$1,499,999.99	0.65 of one percent (65 basis points)
\$1,500,000.00 – and above	0.30 of one percent (30 basis points)

With no minimum account balance and a minimum quarterly charge of \$1000, our fee may exceed 3.0% or greater of assets under management. This fee is in excess of industry norm and that similar advisory services can be obtained for less. The fees shown above may be negotiable under limited circumstances. The fees we charge can be deducted directly from your account at Schwab. We will instruct Schwab to



deduct the fees from your account at the end of the quarter. This fee will show up as a deduction on your following monthly account statement from the custodian.

The client or the investment manager may terminate the agreement by written notice to the other party. At termination, the quarterly fee will be billed on a pro rata basis for the portion of the month completed. The portfolio value at the completion of the prior full billing month is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination. For new client relationships, the initial advisory fee is calculated based upon the value of the assets that are initially transferred.

If you do not want us to charge your account for the fee, you may pay the fee directly to us. We will send you an invoice detailing the fee calculation. Fees are due in full 15 days after receipt of the invoice.

## **2. Financial Planning Services**

We offer our financial planning services on a fixed fee basis and we can charge \$3,500 and up for these services. Our fees may be negotiable depending upon the nature and complexity of your circumstances. We may also negotiate the method and timing of payment. The Financial Planning fees are due  $\frac{1}{2}$  initially and  $\frac{1}{2}$  due 90 days later.

All financial plans will be presented to you within 120 days of the contract date, provided that all information needed to prepare the investment plan has been promptly provided to us. Either party may terminate the relationship within five (5) days of signing the Financial Planning Agreement without penalty. Thereafter, in the event that you cancel the Financial Planning Agreement, you will be responsible for the actual hours spent preparing the financial plan, up to the cancellation date, at the agreed upon hourly rate. Any fees that are due, but have not been paid, will be billed to you and are due immediately.

We also have the ability to schedule your payment to be automatically deducted from your bank account, or charged to your VISA, MasterCard, American Express or Discover Card. In order to process the fee payment in this manner, the client will provide us with written authorization to process the payments. Each month we will email a receipt to the client for the payment. We use a vendor, PaySimple to process these payments for us.

## **3. Third-Party Money Managers**

Payment of Portfolio Management Fees Asset-based portfolio management fees are withdrawn directly from the client's accounts on a quarterly basis. Fees may be paid either in advance or in arrears. All of the foregoing terms are agreed to in the Investment Advisory Contract or Sub-Advisory agreement, whichever is appropriate to the form of client relationship. We urge our clients to refer to the selected TPMM's disclosure documents for exact fees and expenses charged by each such TPMM, as well as minimum account requirements, refund, and termination provisions. A complete description of each program can be found in disclosure materials prepared by the TPMM, which we will provide to the client at the time we recommend the program.

## **4. Held Away Accounts**

The management fee will be assessed and billed quarterly. Specifically, the exact amount charged is determined by the daily average over the course of the quarter. The current exception for this is directly-managed held-away accounts, which are determined by the account value at the end of the quarter. In either case, if the Adviser only manages your assets for part of a quarter, the charge will be prorated. The advisory fee is a blended fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart and applying the fee to the daily average of the account value or the account value as of the last day of the previous quarter (per the paragraph above), resulting in a combined weighted fee. Investment management fees are generally directly debited on a pro rata basis from client accounts. The exception for this is directly-managed held-away accounts, such as 401(k)'s. As it is impossible to directly debit the fees from these accounts, those fees will be assigned to the client's taxable accounts on a pro-rata basis. If the client does not have a taxable account, those fees will be billed directly to the client. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

## **Item 6 – Performance Based Fee and Side by Side Management**

---

We do not charge any performance-based fees.

## **Item 7 – Types of Client(s)**

---

We provide wealth management and financial planning services to individuals, high net worth individuals, and pension plans.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

---

We use fundamental analysis and modern portfolio theory as part of our overall investment management discipline; the delivery of these analyses as part of our financial planning services to you may include any, all or a combination of the following:

### **1. Fundamental Analysis**

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

Fundamental analysis serves to answer questions, such as:

- Is the company's revenue growing?
- Is it actually making a profit?
- Is it in a strong-enough position to beat out its competitors in the future?
- Is it able to repay its debts?

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

Once we discover undervalued securities or funds that are investing in undervalued stocks; we look at the stability and volatility.

In order to perform this fundamental analysis, we use many resources, such as:

- Morningstar
- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings with the Securities and Exchange Commission
- Research materials prepared by others
- Company press releases
- Corporate rating services
- Timing Services
- Company websites
- Inspections of corporate activities.

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year
- Short term purchases - securities sold within a year

## **2. Modern Portfolio Theory (MPT)**

We use publicly available research and reports regarding individual securities, issuers, investment strategies and performance of asset classes to select the funds they will offer. They also use Modern Portfolio Theory to help them select the funds they offer. Modern Portfolio Theory was created by some of the world's leading academic economists. They conducted extensive research, demonstrating that asset class selection (such as small-cap vs. large-cap, value vs. growth and U.S. vs. international)-not stock selection or market timing-is the most important determinant of portfolio performance. They also received a Nobel Prize for revealing these four tenets:

1. Markets process information so rapidly when determining security prices, that it is extremely difficult to gain a competitive edge by taking advantage of market anomalies or inefficiencies.

2. Over time, riskier investments provide higher returns as compensation to investors for accepting greater risk.
3. Adding high-risk, low correlating asset classes to a portfolio can actually reduce volatility and increase expected rates of return.
4. Passive asset class fund portfolios can be designed to deliver over time the highest expected returns for a chosen level of risk.

Modern portfolio theory tries to understand the market as a whole, rather than looking for what makes each investment opportunity unique. Investments are described statistically, in terms of their expected long-term return rate and their expected short-term volatility. The volatility is equated with "risk," measuring how much worse than average an investment's bad years are likely to be. The end goal is to identify your acceptable level of risk tolerance, and then to find a portfolio with the maximum expected return for that level of risk.

### **3. Risks**

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to handle. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

#### **1. Fundamental Analysis Risk**

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- When using this method with mutual funds, the funds are composed of many companies and not all of them will be undervalued
- The data used may be at least six months out of date.
- It is difficult to give appropriate weightings to the factors.
- In the early 1970s and 1980s price/earnings multiples of 80 or 90 were considered acceptable by some for 'blue chip' stocks in the United States.
- In the 1980s in the United States some biotechnology stocks sold at '50 times sales'. The companies had no earnings and paid no dividend. The new yardstick to value these became 'products in the pipeline'. By the late 1980s most had lost three-quarters of their stock price.
- It assumes that the analyst is competent.
- A fundamental analyst assumes that other fundamental analysts will form the same view about the company and buy the stock, thus restoring its value and returning the trader or investor a capital gain. In practice, an undervalued company's stock price can stay at approximately the same level (or decline) for years.

- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.
- It assumes that there is no monopolistic power over markets.
- Even when fundamental analysis reveals an undervalued company, or a stock with high growth prospects, it does not tell us anything about the timing of the purchase of the stock. In other words, we may have discovered a grossly undervalued stock whose price has been falling for some time and may well continue falling.

## 2. Mutual Funds Risk

The following is a list of some general risks associated with investing in mutual funds.

- Country Risk - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- Currency Risk -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- Income Risk - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- Industry Risk - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- Inflation Risk - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- Manager Risk -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- Market Risk -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- Principal Risk -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

## 3. Overall Fund Risk

- Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.
- Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.

While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

#### 4. Stock Fund Risk

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

Not all stock funds are the same. For example:

- Growth funds focus on stocks that may not pay a regular dividend but have the potential for large capital gains.
- Income funds invest in stocks that pay regular dividends.
- Index funds aim to achieve the same return as a particular market index, such as the S&P 500 Composite Index, by investing in all — or perhaps a representative sample — of the companies included in an index.
- Sector funds may specialize in a particular industry segment, such as technology or consumer products stocks.

## **Item 9 – Disciplinary Information**

---

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We have no information to disclose here about the Hamilton Financial Planning LLC or any of our investment advisors. We adhere to high ethical standards for all advisors and associates. We strive to do what is in your best interests.

## **Item 10 – Other Financial Industry Activities and Affiliations**

---

Scott Hamilton is the Managing Member of Hamilton Financial Planning LLC which holds office leases and is not investment related. Scott spends up to 10 hours per month performing duties associated with this.

Scott Hamilton is also the President of T-N-T Real Estate Investments which has rental properties. This is not investment related and Scott spends about 3 hours per week performing tasks associated with this.

We may recommend or select TPMMs for our clients and receive compensation from the third-party via a fee share; thus, a material conflict of interest exists between our interests and those of our clients in that the Advisor has an incentive to direct clients to TPMMs that provide us with a larger fee split. The Advisor will always act in the best interest of our clients when making recommendations or selecting

TPMMs. The client always has the right to decide whether to act on our recommendations and whether to utilize the services of the recommended TPMM. The client always has the right to utilize the professional of his or her choice. All TPMMs will be properly licensed and registered as investment advisers in the proper jurisdictions. The fees shared will not exceed any limit imposed by any regulatory agency.

## **Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading**

---

### **1. General Information**

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

### **2. Participation or Interest in Client Accounts**

We may recommend securities to you that we have purchased for our own accounts. However, we do not trade your accounts.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices
- Participating in client accounts.

You may request a copy of the firm's Code of Ethics by contacting Scott Hamilton.

### **3. Personal Trading**

We have established the following restrictions in order to ensure our fiduciary responsibilities to you are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of Investment Advisory Representative(s) of Hamilton Financial Planning LLC, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.
- We emphasize your unrestricted right to decline to implement any advice rendered.

However, some securities trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with our records as required.

In addition, open-end mutual funds and/or investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value. Therefore, purchases of mutual funds and/or variable insurance products by an advisor are not likely to have an impact on the prices of the fund in which you invest. These types of transactions are not prohibited by our policies and procedures.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

#### **4. Privacy Statement**

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

### **Item 12 – Brokerage Practices**

---

HFP does not maintain custody of your assets, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees 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 recommend that our clients use Schwab, MyUtah 529, and Betterment. We are independently owned and operated and are not affiliated with Schwab, MyUtah 529, or Betterment. Schwab, MyUtah 529, or Betterment will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab, MyUtah 529, or Betterment by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so.

#### **HOW WE SELECT BROKERS/CUSTODIANS**

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services.

We consider a wide range of factors, including:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or



to facilitate such services.

- Capability to facilitate timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability

## **YOUR BROKERAGE AND CUSTODY COSTS**

For our clients' accounts that Schwab maintains, Schwab generally does charge you separately for custody/brokerage services. We have determined that having Schwab execute 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 (see "How we select brokers/custodians").

### Products & Services Available to Us from Schwab

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like ours. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. 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 on an unsolicited basis and at no charge to us as long as we maintain a total of at least \$10 million of our clients' assets in accounts at Schwab.

### Services that Benefit Client

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 clients or their account(s).

### Services that May Not Directly Benefit Clients

Schwab also makes available to us other products and services that benefit us but cannot directly benefit the client or their account(s). These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We can use this research to service all or some 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:

- provides access to client account data (such as duplicate trade confirmations and account statements);
- facilitates trade execution and allocates aggregated trade orders for multiple client accounts;
- provides pricing and other market data;
- facilitates payment of our fees from our clients' accounts; and
- assists with back-office functions, recordkeeping, and client reporting.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants, and insurance providers.

Schwab can provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab can also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Irrespective of direct or indirect benefits to our client through Schwab, we strive to enhance the client's experience, help reach their goals and put their interests before that of our firm or its associated persons.

## **1. Best Execution**

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

## **2. Brokerage for Client Referrals**

We do not receive any compensation or incentive for referring you to broker-dealers for brokerage trades.

## **3. Directed Brokerage**

Clients are permitted to use the custodian of their choosing. For any clients wishing to maintain accounts at custodians other than Schwab, MyUtah 529, or Betterment we will not charge any assets under management fee on those accounts. However, you may be charged a fee for financial planning services. If you elect to select your own broker-dealer or custodian and direct us to provide advice on those accounts, you may pay higher or lower fees than what is available through our relationships. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer or custodian when providing financial planning services on accounts held outside of Schwab, MyUtah 529, and Betterment, unless we believe that such rate is unfair or unreasonable for the size and type of transaction. For any trades executed through Schwab, we will seek best execution for you.

## **4. Trading**

Transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

## **Item 13 – Review of Accounts**

---

### **1. Reviews**

Reviews will be conducted by Scott Hamilton, our CCO at least annually. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

## **Item 14 – Client Referrals and Other Compensation**

---

We receive a non-economic benefit from Schwab 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. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

We compensate third parties for client referrals. If a client is introduced to us by a solicitor, we may pay that solicitor an ongoing referral fee constituting a percentage of the referred client's advisory fee paid to our firm for a period determined by an executed solicitor's agreement.

While we do have a current arrangement with any TPMs, at such time that we do, we will receive compensation based on the service they provide to our clients. Any such compensation arrangement will be formalized in an agreement and disclosed to our clients.

## **Item 15 – Custody**

---

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account.

Schwab maintains actual custody of your assets. Your statements will be available for you to. You will also receive account statements directly from Schwab at least quarterly. You should carefully review those statements promptly.

For our investment advisory clients, we recommend using Schwab as the custodian and/or broker-dealer for all your investment advisory accounts. You should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains your investment assets. We urge you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact Scott Hamilton.

We do not debit the client fees directly from your advisory account. We send information to your custodian to debit your fees and to pay them to us. You authorized the custodian to pay us directly at the onset of the relationship.

## **Item 16 – Investment Discretion**

---

We usually receive discretionary authority from you at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. This information is described in the Advisory Agreement you sign with us. In all cases, however, this discretion is exercised in a manner consistent with your stated investment objectives for your account.

When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions you have set. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

We require that any investment guidelines and/or restrictions be provided to us in writing.

We do not receive discretionary authority from some clients to select the type of securities and amount of securities to be bought or sold. We usually only have the ability to rebalance and reallocate your accounts on a quarterly basis, with your permission. The Advisory Agreement details this in full.

## **Item 17 – Voting Client Securities**

---

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. We are authorized to instruct the custodian to forward you copies of all proxies and shareholder communications relating to your account assets.

## **Item 18 – Financial Information**

---

We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

## **Item 19 – Requirements for State Registered Advisers**

---

### **Firm Principals**

There is one principal of Hamilton Financial Planning LLC, Scott Hamilton. He is the chief compliance officer and was born in 1962. Scott Hamilton's information is in the attached ADV Part 2B Brochure Supplement.

**Performance Fees**

The Advisor does not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client).

**Other Relationships**

Neither the firm nor Scott Hamilton has any relationship with any issuer of securities.

## **ADV Part 2B Brochure Supplement – Scott Hamilton**

# Scott Price Hamilton

**Hamilton Financial Planning LLC**

**1202 Lakeway Dr. Suite 7**

**Lakeway, TX 78734**

**(512) 261-0808**

This Brochure supplement provides information about Scott Hamilton and supplements the Hamilton Financial Planning LLC Brochure. You should have received a copy of that Brochure. Please contact Scott Hamilton if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Hamilton Financial Planning LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

**Birth Year:** 1962

### Education

Master of Business Administration in International Business      1991  
Pepperdine University, Malibu, CA

Bachelor of Business Administration      1984  
Texas State, San Marcos, TX

### Designations

CFP®      2012  
College of Financial Planning, Denver, CO

### Minimum Designation Requirements

#### Certified Financial Planner (CFP)

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”).

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. Currently, more than 62,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

**Prerequisites/Experience:** Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year)

**Educational Requirements:** 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 Type:** Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, 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.

**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/Experience Requirements:** 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.

**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.

### **Business History**

September 2013 – Present	Managing Member at Hamilton Financial Planning LLC
January 2012 – September 2013	IA Representative at Garrett Investment Advisors LLC
November 2010 - January 2012	Managing Member at Hamilton Financial Planning LLC

### **Item 3 – Disciplinary History**

Neither Hamilton Financial Planning LLC nor Scott Hamilton has any disciplinary history to disclose.

### **Item 4 – Other Business Activities**

Scott Hamilton is also the President of T-N-T Real Estate Investments which has rental properties. This is not investment related and Scott spends about 3 hours per week performing tasks associated with this.

### **Item 5 – Additional Compensation**

Scott Hamilton does not receive any additional compensation.

### **Item 6 – Supervision**

Scott Hamilton is the Chief Compliance Officer and performs all supervisory duties for this firm. In performing the supervisory functions, he follows all of the supervisory steps which are prescribed in the HFP's policies and procedures manual.

### **Item 7 – Requirements for State-Registered Advisers**

Scott Hamilton has no reportable events to disclose here.



## **ADV Part 2B Brochure Supplement – Trent Hamilton**

# Trent Hamilton

**Hamilton Financial Planning LLC**

**1202 Lakeway Dr. Suite 7**

**Lakeway, TX 78734**

**(512) 261-0808**

This Brochure supplement provides information about Trent Hamilton and supplements the Hamilton Financial Planning LLC Brochure. You should have received a copy of that Brochure. Please contact Scott Hamilton if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about Hamilton Financial Planning LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

