Item 1 – Cover Page



14100 San Pedro Avenue, Suite 418 San Antonio, Texas 78232

Date of Brochure: March 27, 2023

This brochure provides information about the qualifications and investment advisory business practices of SA Financial Solutions, LLC. If you have any questions about the contents of this brochure please contact us at (210) 497-8743 or <u>matthew@safinancialsolutions.com</u>. 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 our investment advisory business is also available on the Internet at <u>www.adviserinfo.sec.gov</u>. You can view our information on this website by searching for "SA Financial Solutions, LLC." You can also search using the firm's CRD numbers. The CRD number for the firm is 157790.

\*Registration as an investment advisor does not imply a certain level of skill or training.

#### Item 2 – Material Changes

There have been no material changes since our last filing on March 31, 2022. We will ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31st so you will receive the summary of material changes, if any, no later than April 30th each year. At that time we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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## Item 4 – Advisory Business

SA Financial Solutions, LLC ("SA Financial Solutions") was approved as an investment advisor registered with the State of Texas Securities Commission in October 2011 and is a Limited Liability Company formed under the laws of the State of Texas.

• Gerhardt G. Hartman is the Managing Member and Owner of SA Financial Solutions, LLC. Matthew Hartman is the Chief Compliance Officer for SA Financial Solutions.

# General Description of Primary Advisory Services

The following are brief descriptions of SA Financial Solutions' primary services. A detailed description of SA Financial Solutions' services is provided in *Item 5 – Fees and Compensation* so that clients and prospective clients can review the description of services and description of fees in a side-by-side manner.

SA Financial Solutions provides personalized confidential financial planning and investment management to individuals, trusts, estates, and charitable organizations. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

SA Financial Solutions is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm's President is affiliated with entities that sell financial insurance products.

Investment advice is provided, with the client making the final decision on investment selection. SA Financial Solutions does not act as a custodian of client assets. The client always maintains asset control.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

**Financial Planning Services -** SA Financial Solutions provides advisory services in the form of financial planning services. Financial planning services do not involve the active management of client accounts, but instead focuses on a client's overall financial situation. Financial planning can be described as helping individuals determine and set their long-term financial goals, through investments, tax planning, asset allocation, risk management, retirement planning, and other areas. The role of a financial planner is to find ways to help the client understand his/her overall financial situation and help the client set financial objectives.

**Asset Management Services -** SA Financial Solutions provides advisory services in the form of Asset Management Services. Asset Management Services involve providing clients with continuous and on-

going supervision over client accounts. This means that SA Financial Solutions will continuously monitor a client's account and make trades in client accounts when necessary.

*Third Party Money Managers* – SA Financial Solutions provides advisory services by referring clients to outside, or unaffiliated, money managers that are registered or exempt from registration as investment advisers. Third-party money managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary.

## Specialization.

The firm specializes in providing individualized investment advice through its asset management services.

## Limits Advice to Certain Types of Investments.

SA Financial Solutions provides investment advice on the following types of investments:

- No-Load (i.e. no commission) and Load-Waived (i.e. commission waived) Mutual Fund Shares
- Exchange-listed securities (i.e. stocks)
- Securities traded over-the-counter (i.e. stocks)
- Fixed income securities (i.e. bonds)
- Closed-End Funds and Exchange Traded Funds (ETFs)
- Foreign Issues
- Corporate debt securities (other than commercial paper)
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- United States government securities
- Options contracts on securities
- Interests in partnerships investing in real estate and oil and gas interests

SA Financial Solutions does not provide advice on warrants, commercial paper, options contracts on commodities, future contracts on tangibles and intangibles, hedge funds and other types of private (i.e. non-registered) securities.

When providing asset management services, SA Financial Solutions typically constructs each client's account holdings primarily using ETFs, mutual funds, and listed equities to build diversified portfolios. Portfolios are created based on your risk tolerance and our expectations of market behavior. We may modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

#### Tailor Advisory Services to Individual Needs of Clients

SA Financial Solutions' services are always provided based on the individual needs of each client. This means, for example, that you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We work with each client on a one-on-one

basis through interviews and questionnaires to determine the client's investment objectives and suitability information.

## Wrap-Fee Program versus Portfolio Management Program

In traditional management programs, advisory services are provided for a fee but transaction services are billed separately on a per-transaction basis. In wrap-fee programs, advisory services and transaction services are provided for one fee. SA Financial Solutions does not act as a portfolio manager of or sponsor for wrap fee programs.

## **Client Assets Managed by SA Financial Solutions**

SA Financial Solutions, LLC was approved as an Investment advisor in the state of Texas in October 2011 and as of December 31, 2022 has \$15,900,000.00 assets under management on a discretionary basis.

## Item 5 – Fees and Compensation

In addition to the information provide in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements.

# Comprehensive Financial Planning Fixed Fee Program

We offer written financial planning services consistent with your current financial situation as well as your financial goals and objectives. Our investment advisor representatives ("representatives") meet with you to gather information and documentation needed to perform an analysis and review of your situation as well as your objectives and goals. One or more meetings may be required in order to gather all needed information and determine the services best suited to help meet your needs. We rely on the information provided by you. Therefore, it is very important that the information you provide is complete and accurate. We are not responsible for verifying the information supplied by you. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. Our services do not include legal or tax advice. You are also urged to work closely with your attorney, accountant or other professionals regarding you financial and personal situation.

After completing a review and analysis of the information and documents received, our representatives develop their analyses and recommendations and present either a comprehensive or modular (segmented) written financial plan. A comprehensive plan focuses on your overall financial situation and covers several of the areas previously noted, as needed by your specific situation. A modular (segmented) plan focuses only on one or more specific area(s) of concern to you, and you should be aware that other important issues may not be taken into consideration when our representatives develop their analyses and recommendations.

We charge fixed fees of up to \$2500 for the preparation of written financial plans depending on the complexity of a client's financial situation. Client will pay half of the fee in advance with the balance payable after ninety (90) days, or when the plan is delivered. Services are completed and delivered inside of 90 days.

# Hourly Financial Planning Consulting Program

## Analyses, Plans, Consultations and Fees

If you elect to engage us for this service, we will provide financial analysis and financial planning services consistent with your current financial and tax status, financial goals, investment attitudes and risk/reward parameters. The fees for these services are generally based on the time required to perform the services and are billed at a rate of up to \$200 per hour, subject to a minimum fee of \$200. SA Financial Solutions LLC also offers consultation services on any topic of interest to the client. Consultation services can include general non-securities advice on topics such as tax planning, estate planning and business planning. The fees for these financial services are also included in the up to \$200 per hour rate described above. SA Financial Solutions does not provide legal or tax advice, however we do work with your tax and legal advisors. Clients are encouraged to seek proper legal and tax counsel.

An estimate of the time required will be made before work begins, and a maximum fee will be indicated on the advisory agreement signed by the client. Fees for the above services are due and payable within 30 days after the services are performed.

Financial planning services automatically terminate upon presentation of the plan to the client or upon completion of the consultation. Either party can also terminate the advisory agreement before then by providing written notice to the other party. Termination will be effective upon receipt of notice. If terminated within five business days of signing the advisory agreement, services are terminated without penalty. If the agreement is terminated after five business days but prior to completion of services, at the option of SA Financial Solutions LLC's associated persons, clients may be responsible for the time expended and expenses disbursed prior to receipt of the termination notice. In this case, SA Financial Solutions LLC will provide clients with a statement detailing the time and expenses due.

#### <u>Asset Management</u>

We offer asset management services, including giving continuous investment advice and/or making investments for you based on you individual needs, goals and objectives. We offer a customized and individualized investment program, and our representatives meet with you to determine your investment objectives, risk tolerances and appropriate asset mixes. Generally, accounts are invested in a broad spectrum of no-load (no commission) mutual funds and index-based securities, although investments may also be made in ETF's, individual equities/stocks, bonds, money market accounts, certificates of deposit or Treasury bills.

We will need to obtain certain information from you to determine your financial situation and investment objectives. Accounts are therefore managed on the basis of your individual financial situation and investment objectives. From time to time, you are reminded to notify us whether your financial situation or investment objectives have changed, or if you want to impose and/or modify any reasonable restrictions on the management of your accounts. At least annually, we contact individual clients to determine whether their financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of accounts managed. We are always reasonably available to consult with individual clients relative to the status of their accounts. You have the ability to impose reasonable restrictions on the management of you accounts, including the ability to instruct us not to purchase certain securities. Your beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the account. A separate account is maintained for each client

with the custodian and clients retain right of ownership of the account (e.g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

It is important that you understand we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions we take for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

SA Financial Solutions does not require that all clients open accounts at one particular Broker Dealer or Custodian. Clients are allowed to hold accounts at the qualified custodian of their choosing. Neither we nor our representatives act as custodian and we do not have access to your funds and securities except to have advisory fees deducted from your account by the custodian with your prior written authorization and then paid to us.

We are granted trading authorization on your accounts and provide management services on a discretionary basis only. This means we make all decisions to buy, sell or hold securities, cash or other investments in the managed account in our sole discretion without consulting with you before making any transactions. You must provide us with written authorization to exercise this discretionary authority and can place reasonable restrictions and limitations on the authority and portfolio holdings. See **Item 16**, **Investment Discretion**, for additional discussion on discretionary and non-discretionary authority.

Prior to engaging us to provide investment management services, you are required to enter into a formal investment advisory agreement with us setting forth the terms and conditions, including the amount of investment advisory fees, under which we manage your assets and also separate custodial/clearing agreements.

Custodians generally do not charge separately for maintaining custody of your accounts, although it may charge brokerage commissions and/or transaction fees directly to you. You may be charged additional fees for executing certain transactions including transaction charges, ticket charges or service fee/charges. Your advisor may agree to offset these charges against future advisory fee collection at his or her discretion. Clients receiving a waiver of transaction fees will receive an offset against future advisory fees equal to the amount of transaction fees waived. All fees and charges are noted on your statements and/or confirmations. All transaction fee offset adjustments will be noted on your fee billing statements. The client will remain responsible for any non-transaction related fees charged by the account custodian. The specifics of each transaction fee offset agreement will be disclosed in the client's investment advisory agreement.

We do not receive any portion of the commission or fees from either the custodian or from you. In addition, you may incur certain charges imposed by third parties other than us in connection with investments made through your account, including, but not limited to, mutual fund sales loads, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges and IRA and qualified

retirement plan fees. Our management fees are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each security prospectus.

## Fees for Asset Management Services

Assets Under Management	
\$0 to \$2,500,000	Up to .5% of the value of the account at the end of each quarter (2.0%
	Annual)
\$2,500,001 - \$5,000,000	Up to .375% of the value of the account at the end of each quarter (1.5%
	Annual)
over \$5,000,000	Negotiable

SA Financial Solutions LLC charges an Asset Management Fee of:

The Asset Management fee may be negotiable at our sole discretion based upon the amount of assets under management, the composition of the portfolio and possibly to individuals that may be related to the IA Representative. Fees are billed quarterly in arrears and calculated on the value of the account at the end of the quarter. Accounts opened mid-quarter are prorated based on the number of days that services are provided during the first billing period.

The fees for our Asset Management services will be deducted directly from your account. In order to have these fees deducted from your account, you will be required to provide the custodian with written authorization to have the fees deducted and paid to us. At least quarterly, the custodian will send you a statement showing all disbursements from the account, including any advisory fees paid to us from your account.

Either party may terminate services at any time by providing 30 days written notice to the other party. If services are terminated within 5 business days of signing the client agreement, they are terminated without penalty. After the initial 5 day period, a 30 day notice is required. During that 30 day period, we continue to provide services previously begun but do not begin any new services without your specific instruction. SA Financial Solutions will be entitled to a pro rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees.

# 401K Investment and Plan Advisory Services

Investment Services: Investment Review and Analysis/Recommendations

SA Financial Solutions offers 401K Investment Analysis and Plan Design for a fee of \$2000. The fees are negotiable, and the final fee schedule will be attached in the Service Agreement. Client will pay a minimum of 50% upon commencement and the balance due upon analysis and design completion. SA Financial Solutions reserves the right to postpone or waive fees. Services will be completed and delivered within 6 months. Client will have 10 days to terminate this agreement.

# 401K Plan Asset Management Services

SA Financial Solutions utilizes a Third Party Administrator in setting up a 401k Plan. Assets are managed using no load mutual funds and ETFs with asset allocation.

#### Fees for 401K Plan Asset Management Services

401K Plan Assets Under Management	
\$0 to \$3,000,000	.25% of the value of the account at the end of each quarter (1% Annual)
\$3,000,001 - \$5,000,000	.20% of the value of the account at the end of each quarter (.8% Annual)
over \$5,000,000	.15% of the value of the account at the end of each quarter (.6% Annual)

The above fees do not include any fees charged by the Third Party Administrator, Custodian, or any other RIA Firm entity. All internal fees charged by ETF's, mutual funds and closed end funds are separate and distinct from the fee schedule listed above. SA Financial Solutions does not share in any brokerage commissions. The above fees are negotiable and the final fee schedule will be attached in the investment advisory agreement. SA Financial Solutions does not at any time act as the Custodian or Third Party Administrator on any employer sponsored plan it renders advice on. Fees are deducted quarterly in arrears and are based on the total asset value as of the last business day of the quarter.

#### **Recommendation of Third Party Money Managers**

SA Financial Solutions intends to act a solicitor and allows its Advisor Representatives to refer clients to unaffiliated third party investment advisory firms offering asset management and other investment advisory services. As a result, SA Financial Solutions is paid a portion of the fee charged and collected by the third party Investment Adviser in the form of solicitor fees or consulting fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with SEC Rule 206(4)-3 and applicable state securities rules and regulations.

Through this program, SA Financial Solutions will assist a client with identifying the client's risk tolerance and investment objectives. SA Financial Solutions will recommend third party Investment Advisers in relation to the client's stated investment objectives and risk tolerance. A client may select a recommended third party Investment Adviser firm based upon the client's needs. Clients will enter into an agreement directly with the unaffiliated third party Investment Adviser who will provide asset management services.

SA Financial Solutions will be available to answer questions the client may have regarding their account and act as the communication conduit between the client and the third party Investment Adviser. Third party Investment Advisers may take discretionary authority to determine the securities to be purchased and sold for the client. SA Financial Solutions will not have any trading authority with respect to a client's managed account with the third party Investment Adviser(s).

Third party managed programs generally have account minimum requirements that will vary from Investment Adviser to Investment Adviser. Account minimums are generally higher on fixed income accounts than equity based accounts. A complete description of the third party Investment Adviser's services, fee schedules and account minimums will be disclosed in the third party Investment Adviser's Form ADV or similar Disclosure Brochure which will be provided to clients at the time an agreement for services is executed and the account is established. Client reports will depend upon the third party Investment Adviser.

While the actual fee charged to a client will vary depending on the third party investment adviser SA Financial Solutions utilized as disclosed in the account agreement executed by you at the time the relationship is established. All fees are calculated and collected by the selected third party Investment Adviser firm who will be responsible for delivering SA Financial Solutions' portion of the client fee to SA Financial Solutions.

Clients may incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees, surrender charges, and IRA and qualified retirement plan fees. SA Financial Solutions will not receive any portion of such commissions or fees. SA Financial Solutions is only compensated by the consulting fee as described above. SA Financial Solutions receives no other compensation in connection with a client's account.

While SA Financial Solutions consistently reviews the performance of numerous third party investment firms, SA Financial Solutions will enter into relationships with only a select number of third party Investment Advisers based on SA Financial Solutions' due diligence.

Third party Investment Advisers recommended by SA Financial Solutions must be registered or exempt from registration in the state where the client resides.

Clients are advised that SA Financial Solutions may have a conflict of interest by only offering those third party Investment Advisers that have agreed to pay a portion of their advisory fee to SA Financial Solutions and have met the conditions of the SA Financial Solutions due diligence review. Clients are advised that there may be other third party managed programs that may be suitable to the client that may be more or less costly. No guarantees can be made that client's financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

# Additional Compensation

From time to time, we may receive expense reimbursement for travel and/or marketing expenses from distributors of insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as advertising, publishing and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are typically made by those sponsors for whom sales have been made or it is anticipated sales will be made. We endeavor at all times to put your interests first as a part of our fiduciary duty. However, you should be aware that receiving additional compensation through nominal sales awards, expense reimbursements, etc. creates a conflict of interest that may impact the judgment of our representatives when making advisory recommendations.

# **Comparable Services**

We believe our fees for advisory services are reasonable with respect to the services provided and the fees charged by other investment advisors offering similar services. However, lower fees for comparable services may be available from other sources.

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

Item 6 is not applicable to this Disclosure Brochure because SA Financial Solutions, LLC does not charge or accept performance-based fees. Performance-based fees are fees based on a share of capital gains or capital appreciation of the assets held within a client's account.

## Item 7 – Types of Clients

SA Financial Solutions generally provides investment advice to the following types of clients:

- Individuals
- High-Net Worth Individuals
- Pension and profit sharing plans
- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed above

#### Minimum Investment Amounts Required

There are no minimum investment amounts or conditions required for establishing an account managed by SA Financial Solutions. However, all clients are required to execute an agreement for services in order to establish a client arrangement with SA Financial Solutions.

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

#### Methods of Analvsis

SA Financial Solutions uses the following methods of analysis in formulating investment advice:

<u>Charting</u> - The set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

**Cvclical** - Analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins, and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

**Fundamental** - A method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of companies). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

**Technical** - A method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

SA Financial Solutions is involved in providing a general overview of a client's total financial condition which is typically in traditional financial planning practices. A recommendation may state a client should diversify their holdings, for example and invest in a growth mutual fund for possible long term growth, rather than be invested heavily in cash. The actual purchase of a specific investment vehicle or sale of a security is left up to the client. SA Financial Solutions may also assist employee benefit plans and their fiduciaries in the selection of appropriate investment objectives, and define funding goals for the plan. A client's risk tolerance is considered when designing and investment strategy to meet the client's goals.

#### Investment Strategies

SA Financial Solutions uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

<u>**Trading</u>**. Investments sold within 30 days.</u>

<u>Margin transactions</u>. When an investor buys a stock on margin, the investor pays for part of the purchase and borrows the rest from a brokerage firm. For example, an investor may buy \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. Clients cannot borrow stock from SA Financial Solutions.

**Option writing**. Option writing includes covered options, uncovered options, or spreading strategies. Options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time.

<u>Tactical asset allocation</u>. Allows for a range of percentages in each asset class (such as Stocks = 40-50%). These are minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of <u>market timing</u> is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

**Strategic asset allocation**. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a "buy and hold" strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client's goals and needs change and as the time horizon for major events such as retirement and college funding growshorter.

SA Financial Solutions works closely with clients developing an overall written financial plan emphasizing maximum use of current income and to create long term capital appreciation with prudent financial

planning techniques. Each plan is prepared with the client's goals in mind covering retirement, insurance needs, investments, taxes and estate distribution.

## Use of Primary Method of Analysis or Strategy

SA Financial Solutions' primary strategy may involve the frequent trading of securities. The frequent trading of securities may have a positive or negative impact on investment performance. Performance from active trading can be lowered due to an increase in brokerage and other transaction costs.

SA Financial Solutions' primary methods of analysis and primary trading strategies are technical for short term trading and fundamental for long term portfolios. Some of the risks involved with using these methods are detailed below.

#### Primarily Recommend One Type of Security

We do not recommend just one type of security.

## <u>Risk of Loss</u>

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated when investing in securities through our investment management program.

- Market Risk Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- <u>Company Risk</u>. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. 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. For

example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.

- Fixed Income Risk. When investing in bonds, there is the risk that issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the <u>risk</u> that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ETF and Mutual Fund Risk When investing in a an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. Clients will also incur brokerage costs when purchasing ETFs.
- Management Risk Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

# Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

# Item 10 – Other Financial Industry Activities and Affiliations

SA Financial Solutions is **not** and does **not** have a related company that is a:

- 1. Broker/dealer, municipal securities dealer, government securities dealer or broker,
- 2. Futures commission merchant, commodity pool operator or commodity trading adviser,
- 3. 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),
- 4. Other investment adviser
- 5. Financial planning firm,
- 6. Banking or thrift institution,
- 7. Lawyer or law firm,
- 8. Insurance company or agency,
- 9. Pension consultant,
- 10. Real estate broker or dealer,

- 11. Sponsor or syndicator of limited partnerships, or
- 12. Accountant or accounting firm.

While SA Financial Solutions does not sell products or services other than investment advice, our associated persons may sell other products or provide other services outside of their roles with SA Financial Solutions. SA Financial Solutions provides financial planning and asset management services as its principal business.

We estimate that Gerhardt (Gary) Hartman and Matthew Hartman spend approximately 60% of their time on general asset management and financial planning.

## Insurance Activities

While SA Financial Solutions and our primary business involves providing investment advice; Gerhardt (Gary) Hartman and Matthew Hartman are licensed as an independent insurance agent through various insurance companies. You are never obligated or required to use or purchase insurance products through Gerhardt or Matthew in their separate insurance capacity; however, when acting in this separate capacities, they can help you obtain insurance products and will receive separate compensation (i.e. insurance commissions) in addition to investment advisory fees charged.

Gerhardt (Gary) Hartman and Matthew Hartman spend approximately 40% of their time offering insurance products.

## Third-Party Money Managers

As described in *Item 4 – Advisory Business* and *Item 5 – Fees and Compensation*, SA Financial Solutions, LLC may form relationships with independent, third-party moneymanagers.

SA Financial Solutions, LLC may recommend clients work directly with third-party money managers. When we refer clients to a third party money manager, you need to know that our firm will receive a portion of the fee charged by the third party money manager. Therefore, we have a conflict of interest in that we will only recommend third party money managers that will agree to compensate our firm by paying us a portion of the fees billed to your account managed by the third party money manager. However to address this conflict of interest in accordance with our fiduciary duty to our clients SA Financial Solutions will only recommend third party Investment Advisers that are a match for client's stated investment objectives and risk tolerance. As a part of the engagement process SA Financial Solutions will assist clients with identifying their risk tolerance and investment objectives. Clients will be required to enter into an agreement directly with the unaffiliated third party Investment Adviser who will provide the asset management services. You are never obligated to use the third-party managers recommended by the firm.

# Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

#### Code of Ethics Summary

SA Financial Solutions has adopted a Code of Ethics ("the Code") which sets forth standards of business conduct and requires compliance with the federal securities laws. SA Financial Solutions' Code acts as a reminder to employees that SA Financial Solutions' responsibility to its clients is to provide effective and

proper professional investment management advice based upon unbiased independent judgment and to set standards for employee conduct in those situations where conflicts of interest are most likely to arise. The Code also incorporates procedures that allow SA Financial Solutions to monitor employee activity for compliance with the Code.

SA Financial Solutions' Code of Ethics will be provided in its entirety to any client or prospective client upon request. The following is a summary of the key provisions of the Code:

1. Scope – The Code covers all directors, officers, partners, employees, and any other persons who provide advice on behalf of SA Financial Solutions and who are under SA Financial Solutions' supervision and control (collectively referred to as "Supervised Persons"). A sub-category of Supervised Persons known as Access Persons are subject to personal securities reporting as described below. Access Persons include all Supervised Persons who have access to nonpublic information regarding clients' securities transactions and portfolio holdings or who are involved in making investment decisions or recommendations for client accounts.

2. General Principles – The Code contains a Statement of General Principles summarized as follows: SA Financial Solutions is dedicated to providing effective and proper professional investment management services to its clients and depends upon a high level of public and client confidence for its success. That confidence can be maintained only if SA Financial Solutions Supervised Persons observe the highest standards of ethical behavior in the performance of their duties. SA Financial Solutions has the obligation to exercise its authority for the benefit of its clients, to place the interest of its clients first and to refrain from having outside interest that conflict with the interests of its clients. SA Financial Solutions and its Supervised Persons must avoid any circumstances that might adversely affect or appear to affect SA Financial Solutions' duty of complete loyalty to clients.

3. Personal Securities Trading – All Access Persons are subject to trading restrictions. Such restrictions include a requirement that SA Financial Solutions pre-approve certain personal securities transactions. In addition, Access Persons must report their personal securities transactions quarterly and personal securities holdings annually.

4. Code of Conduct – The Code contains a Code of Conduct designed to reflect SA Financial Solutions commitment to ethical conduct. It covers a number of topics including conflict of interest, compliance with legal and regulatory requirements, confidentiality of client information, gifts and entertainment, political contributions, board directorships and outside business activities. SA Financial Solutions also maintains separate Insider Trading Policies and Procedures.

5. Code Violations – The Code requires that all Supervised Persons report any actual or apparent violation of the Code and provides for a prohibition on retaliation against any person who reports such violations. Appropriate sanctions are included for Code violations.

Compliance Oversight - SA Financial Solutions' Chief Compliance Officer, Matthew Hartman is responsible for compliance oversight of SA Financial Solutions' Code of Ethics.

# Affiliate and Employee Personal Securities Transactions Disclosure

SA Financial Solutions or our associated persons may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of SA Financial Solutions that all persons associated in any manner with our firm must

place the interests of our clients ahead of their own when implementing personal investments. SA Financial Solutions and our associated persons shall not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry. In order to minimize this conflict of interest, securities recommended by SA Financial Solutions are widely held and publicly traded.

The potential conflict of interest in these transactions is stated fully in the Financial Planning agreement, which is signed by the client prior to paying any fees or receiving any investment advisory services. Some associated persons may invest in programs such as limited partnerships or equities that the Corporation may render advice to clients about, and the Corporation makes full disclosure in advance if any associated person has made such an investment to the knowledge of the Corporation. In the unlikely event that the interests of SA Financial Solutions' account would happen to correspond with an advisory client's interests, full disclosure would be made to such client at once.

It is further noted SA Financial Solutions is in and shall continue to be in total compliance with The Insider Trading and Securities fraud Enforcement Act of 1988. Specifically, SA Financial Solutions has adopted a firm wide policy statement outlining insider trading compliance by SA Financial Solutions and our associated persons and other employees. This statement has been distributed to all associated persons and other employees of SA Financial Solutions and has been signed and dated by each such person. A copy of such firm wide policy is left with such person and the original is maintained in a master file. Further, SA Financial Solutions has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm wide policy. These materials are also distributed to all associated personal and other employees of SA Financial Solutions, are signed, dated and filed with the insider trading compliance materials. There are provisions adopted for (1) restricting access to files, (2) providing continuing education, (3) restricting and/or monitoring trading on those securities of which SA Financial Solutions' employees may have non-public information, (4) requiring all of SA Financial Solutions' employees to conduct their trading through a specific broker or reporting all transactions quarterly to SA Financial Solutions, and (5) monitoring the securities trading of the firm and its employees.

#### Item 12 – Brokerage Practices

SA Financial Solution does not maintain any soft dollar agreements and does not have a referral relationship with any broker dealer.

Clients are under no obligation to act on the financial planning recommendations of SA Financial Solutions. If the firm assists in the implementation of any recommendations, we are responsible to ensure that the client receives the best execution possible.

SA Financial Solutions typically does not suggest a broker through which to transact securities sales. The client has the unrestricted right to choose their own broker.

SA Financial Solutions' clients do not pay a brokerage commission in excess of the amount that would be charged by another broker in recognition of the value of the brokerage or research services. Standard stock commissions are compared with other brokers in order to determine the reasonableness of the commissions.

Pursuant to IA-1092, the following statement is also made by SA Financial Solutions: (1) Gerhardt Hartman and Matthew Hartman may also be associated with various insurance companies. (2) Clients are under no obligation to have SA Financial Solutions or its associated persons implement any suggestions made in a written financial plan. (3) If asked to implement the suggestions of the financial plan, SA Financial Solutions intends to implement such financial planning, in whole or in part through products offered by these companies. (4) To the extent SA Financial Solutions or our associated persons do implement, they will be acting as agents for the insurance companies. (5) If insurance products are sold, commissions may be received by Gerhardt Hartman or Matthew Hartman. (6) Clients shall have total freedom to execute securities and/or insurance transactions with any company of their choice.

Gerhardt Hartman and Matthew Hartman may sell insurance products and may receive commission income from the sale of such products as an independent contractor with such companies. They may also receive insurance trails, and/or ongoing 'service' fees.

# Handling Trade Errors

SA Financial Solutions has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is the policy of SA Financial Solutions to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client will be made whole and any loss resulting from the trade error will be absorbed by SA Financial Solutions if the error was caused by the firm. If the error is caused by the broker-dealer, the broker-dealer will be responsible for handling the trade error. If an investment gain results from the correcting trade, the gain will remain in the client's account unless the same error involved other client account(s) that should also receive the gains and it is not permissible for all clients to retain the gain. SA Financial Solutions may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

SA Financial Solutions will never benefit or profit from trade errors.

# Block Trading Policy

SA Financial Solutions typically executes transactions for client accounts by purchasing or selling the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when SA Financial Solutions believes such action may prove advantageous to clients. When SA Financial Solutions aggregates client orders, the allocation of securities among client accounts will be done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among our firm's clients in proportion to the purchase and sale orders placed for each client account on any given day. When SA Financial Solutions determines to aggregate client orders for the purchase or sale of securities, including securities in which SA Financial Solutions may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* It should be noted, SA Financial Solutions does not receive any additional compensation or remuneration as a result of aggregation.

#### Item 13 – Review of Accounts

## Account Reviews and Reviewers

For Asset Management clients, Gerhardt G. Hartman will be responsible for performing all client reviews and updates. Each Asset Management account will be reviewed after the end of each calendar quarter. Account reviews are performed more frequently when market conditions dictate. The number of clients reviewed by each representative will vary.

Other portfolio or market data may be included for illustrative, historical, or comparative purposes. These reports and reviews may be conducted in person, in a group setting with other clients, delivered by mail, or by electronic or telephonic transmittal. Performance monitoring and asset allocations are reviewed by SA Financial Solutions on an ongoing basis.

For financial planning clients, the written financial plan is based on the individual needs and goals of each client and will be continuous only if the client elects to engage SA Financial Solutions to conduct periodic reviews of the plan based on a continuing service agreement. If the reviews are elected by the client, they would be conducted on an agreed upon intervals, and would be based on updated data and goals of the client. An hourly fee of \$200.00 per hour would be charged to provide plan updates. These reviews would be done on intervals requested by the client, most likely annually. SA Financial Solutions' associated persons are responsible for performing all client reviews and updates and will prepare any new recommendations

For financial planning clients, a complete plan update will be performed at their request and expense. Particular attention will be paid to any areas with significant change since the time of their last plan review.

#### Statements and Reports

Confirmation of each transaction will be generated by the mutual fund company, variable annuity or life company, custodian/broker/dealer, or money manager and sent directly to each client. In addition, clients will receive statements from the investment company, broker/dealer or money manager at which their account is maintained at least quarterly.

Clients should carefully review those statements and are urged to compare the statements against correspondence that may be provided directly from SA Financial Solutions. When clients have questions about their account statements, they should contact SA Financial Solutions or the qualified custodian preparing the statement.

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

SA Financial Solutions does not directly or indirectly compensate anyone for client referrals.

#### Additional Compensation

Some of the custodians we use may provide us with access to our institutional trading and custody services, which are typically not available to retail investors. Custodial services include brokerage,

custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. Some custodians may also make available to us other products and services that benefit us but may not benefit our clients' accounts. Some of these other products and services assist us in managing and administering clients' accounts. These include software and other technology that providing access to client account data (such as trade confirmation and account statements); facilitate trade execution (and allocation of aggregated trade orders from multiple client accounts); provide research, pricing information and other market data; facilitate payment of our fees from our clients' accounts; and assist with backoffice functions; record-keeping and client reporting. Many of these services generally may be used to service all or a substantial number of our accounts, including accounts not maintained at some custodians. The variety of custodians also may make available to us other services intended to help us manage and further develop our business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, custodians may make available, arrange and/or pay for these types of services rendered to us by independent third party providing these services to us. While as a fiduciary, we endeavor to act in our clients' best interests, and our recommendation that clients maintain their assets in accounts at certain custodians may be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the custodian, which may create a potential conflict of interest.

Gerhardt Hartman and Matthew Hartman in their individual capacity are licensed insurance agents with various insurance companies and may receive commissions and other incentive awards including but not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses for the recommendation/sale of annuities and other insurance products in their individual capacities as independent insurance agents, in connection with providing investment advice to clients. The receipt of this compensation may affect the judgment of our associated persons when recommending products to clients. While our associated persons endeavor at all times to put the interest of the client first as a part of our fiduciary duty, clients should be aware that the receipt of commission and additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations.

# Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented.

SA Financial Solutions is deemed to have custody of client funds and securities whenever SA Financial Solutions is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody SA Financial Solutions will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which SA Financial Solutions is deemed to have custody, the firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are

delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from SA Financial Solutions. When clients have questions about their account statements, they should contact SA Financial Solutions or the qualified custodian preparing the statement.

#### Item 16 – Investment Discretion

Through our asset management services and upon receiving written authorization from a client, SA Financial Solutions will maintain trading authorization over client accounts. Upon receiving written authorization from the client, SA Financial Solutions may implement trades on a **discretionary** basis. When discretionary authority is granted, SA Financial Solutions will have the authority to determine the type of securities, the amount of securities that can be bought or sold, the broker or dealer to be used, and the commission rates paid for the client's portfolio without obtaining the client's consent for each transaction. However, it is the policy of SA Financial Solutions to consult with the client prior to making significant changes in the account even when discretionary trading authority is granted by the client.

All clients have the ability to place reasonable restrictions on the types of investments that may be purchased in an account. Clients may also place reasonable limitations on the discretionary power granted to our firm so long as the limitations are specifically set forth or included as an attachment to the client agreement.

# Item 17 – Voting Client Securities

SA Financial Solutions will not vote proxies on behalf of your account. While there are some investment advisors that will vote proxies and other corporate decisions on behalf of their clients, we have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to clients to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in accounts managed by our firm.

Clients will receive proxies directly from their custodian or transfer agent and such documents will not be delivered by our firm. Although we do not vote client proxies, if you have a question about a particular proxy feel free to contact us.

#### Item 18 – Financial Information

This item is not applicable to this brochure. SA Financial Solutions does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

SA Financial Solutions has not been the subject of a bankruptcy petition at any time (*Please refer to Information Required by Part 2B of Form ADV: Brochure Supplement for more information*).

# Item 19 - Requirements for State-Registered Advisers

#### Executive Officer and Management Personnel

Gerhardt (Gary) Hartman - 8/23/1948

## **Educational Background:**

Concordia University, Bachelor's Degree – Education, 1970

Texas A&M University, Master's Degree – Educational Administration, 1974

American College, Bryn Mawr, PA

- Chartered Life Underwriter (CLU)\* 1988
- Chartered Financial Consultant (ChFC)\*\* 1989

Prior Securities Licenses

Series 6 – Mutual Funds & Variable Contracts

Series 63 – Texas Blue Skies

Series 22 - Limited Partnerships

Series 62 – Stocks, Warrants, Rights & REITS

Series 24 – Principal Supervisor over Registered Representatives (OSJ)

## **Business Experience:**

SA Financial Solutions, LLC. Managing Member/Founder & Investment Advisory Representative

• May 2011 - Present

Independent Insurance Agent: (license No. 674270): Owner: 1983-Present

Hartman Financial – Owner

January 2003 – October 2009
Jefferson Pilot Securities – Representative; OSJ Office

- January 1992 January 2003
- T.E.A.M Financial Group Partner / Representative
  - July 1991 January 1992

Continuing Financial Educational Services - Owner

• May 1989 – July 1991

Connecticut Mutual / G.R. Phelps – Representative

• June 1987 – May 1989

# **Other Business Activities**

SA Financial Solutions is **not** and does **not** have a related company that is a:

- 1. Broker/dealer, municipal securities dealer, government securities dealer or broker,
- 2. Futures commission merchant, commodity pool operator or commodity trading adviser,
- 3. 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),
- 4. Other investment adviser

- 5. Financial planning firm,
- 6. Banking or thrift institution,
- 7. Lawyer or law firm,
- 8. Insurance company or agency,
- 9. Pension consultant,
- 10. Real estate broker or dealer,
- 11. Sponsor or syndicator of limited partnerships, or
- 12. Accountant or accounting firm.

While SA Financial Solutions does not sell products or services other than investment advice, our associated persons may sell other products or provide other services outside of their roles with SA Financial Solutions. SA Financial Solutions provides financial planning and asset management services as its principal business.

We estimate that Gerhardt (Gary) Hartman spends approximately 60% of his on general asset management and financial planning.

## Insurance Activities

While SA Financial Solutions and my primary business involves providing investment advice; Gerhardt (Gary) Hartman is licensed as an independent insurance agent through various insurance companies. You are never obligated or required to use purchase insurance products through Mr. Hartman in his separate insurance capacity; however, when acting in this separate capacities, he can help you obtain insurance products and will receive separate compensation (i.e. insurance commissions) in addition to investment advisory fees charged.

Gerhardt (Gary) Hartman spends approximately 40% of his time offering insurance products.

# Third-Party Money Managers

As described in *Item 4 – Advisory Business* and *Item 5 – Fees and Compensation*, SA Financial Solutions, LLC may form relationships with independent, third-party moneymanagers.

SA Financial Solutions, LLC may recommend clients work directly with third-party money managers. When we refer clients to a third party money manager, you need to know that our firm will receive a portion of the fee charged by the third party money manager. Therefore, we have a conflict of interest in that we will only recommend third party money managers that will agree to compensate our firm by paying us a portion of the fees billed to your account managed by the third party money manager.

#### No Performance Based Fees

As previously disclosed in Item 6, SA Financial Solutions, LLC does not charge performance based fees.

# No Arbitrations

SA Financial Solutions nor any of its associated persons have been the subject of any client arbitrations, similar legal disputes.

# Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

None to report

# CUSTOMER PRIVACY POLICY NOTICE

We at SA Financial Solutions, LLC consider the protection of your sensitive personal information to be an important priority. Our privacy policy and practices are designed to support this objective. We want our customers to understand what information we collect and how we use it.

We collect nonpublic personal information about our clients such as you from the following sources:

Information we receive from you on applications and other forms and in personal interviews; Information about your transactions with us, our affiliates or others which we may obtain in writing, during telephone or Internet transactions or from data gathering software; and Responses from your employer, benefit plan sponsor, or association regarding any group products we may provide.

We do not disclose any nonpublic personal information about our customers or our former customers to anyone, except as permitted by law or directed by you.

We restrict access to nonpublic personal information about you to those employees, agents, and third parties who need to know that information to provide products, services, or specific transactions to you. We may be required by law or regulation to disclose information to third parties--for example, in response to a subpoena, to prevent fraud, and to comply with rules of, or inquiries from, industry regulators.

We maintain physical, electronic and procedural safeguards that comply with federal standards to guard your nonpublic personal information. We DO NOT do not sell lists of our customers nor do we disclose customer information to marketing companies.

Since we work with a variety of third parties in providing financial services and products to our clients, we encourage our clients to review the privacy policy of each third party firm with which a particular client may do business.

If you have any questions regarding this policy please contact us at (210) 497-8743.

# Information Required by Part 2B of Form ADV: Brochure Supplement - Gerhardt (Gary) Hartman

The following are responses to each item found in the Form ADV Part 2B instructions.

## Item 1 – Cover Page

# Gerhardt (Gary) Hartman SA Financial Solutions, LLC 14100 San Pedro Avenue, Suite 418 San Antonio, Texas 78232 (210) 497-8743

This brochure supplement provides information about Gerhardt (Gary) Hartman that supplements this Disclosure Brochure. Please contact SA Financial Solutions, LLC if you have any questions about the contents of this supplement.

Additional information about Gerhardt (Gary) Hartman is available on the SEC's website at www.adviserinfo.sec.gov.

#### Item 2 – Educational Background and Business Experience

Gerhardt (Gary) Hartman, CLU, ChFC - Born: 8/23/1948

#### **Educational Background:**

Concordia University, Bachelor's Degree – Education, 1970

Texas A&M University, Master's Degree – Educational Administration, 1974

American College, Bryn Mawr, PA

- Chartered Life Underwriter (CLU)\* 1988
- Chartered Financial Consultant (ChFC)\*\* 1989

Prior Securities Licenses

Series 6 – Mutual Funds & Variable Contracts Series 63 – Texas Blue Skies Series 22 – Limited Partnerships Series 62 – Stocks, Warrants, Rights & REITS Series 24 – Principal Supervisor over Registered Representatives (OSJ)

#### **Business Experience:**

SA Financial Solutions, LLC - President and Investment Advisory Representative

• May 2011 - Present

Independent Insurance Agent: (license No. 674270): Owner

- 1983-Present
- Hartman Financial Owner
  - January 2003 October 2009

Jefferson Pilot Securities - Representative; OSJ Office

• January 1992 – January 2003

- T.E.A.M Financial Group Partner / Representative
  - July 1991 January 1992
- Continuing Financial Educational Services Owner
  - May 1989 July 1991
- Connecticut Mutual / G.R. Phelps Representative
  - June 1987 May 1989

## Item 3 – Disciplinary Information

As previously stated in Item 9 of this Disclosure Brochure, I have never been subject to a legal or disciplinary event.

## Item 4 – Other Business Activities

Please refer to Item 10 of this Disclosure Brochure for information regarding my other business activities.

## Item 5 – Additional Compensation

Please refer to Items 10, 12, 14 and 19 of this Disclosure Brochure for information regarding additional compensation.

#### Item 6 – Supervision

Gerhardt (Gary) Hartman is the Managing Member/ Founder of SA Financial Solutions, LLC and ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the activities and services provided by the firm and its supervised persons.

As a part of Mr. Hartman's supervisory responsibilities he will review all transactions, review all correspondence prior to mailing, review all new account paperwork, oversee all marketing/advertising matters conduct annual compliance meetings, review client performance reports and client position reports, review outside business activities and gift and gratuity reports, and review any complaints that may be received.

Mr. Hartman's phone number is (210) 497-8743.

#### Item 7 – Requirements for State-Registered Advisers – Legal and Financial Disclosure

SA Financial Solutions nor any of its associated persons have been the subject of any bankrupcties, client arbitrations, or similar legal disputes.

\* The Chartered Life Underwriter (CLU) designation is issued by The American College. A candidate for designation must have 3 years of full-time business experience within the 5 years before the designation is awarded. Candidates must complete 5 core and 3 elective courses and pass a proctored exam for each course. Designates must complete 30 hours of continued education every 2 years.

\*\* The Chartered Financial Consultant (ChFC) designation is issued by The American College. A candidate for designation must have 3 years of full-time business experience within the 5 years before the designation is awarded. Candidates must complete 6 core and 2 elective courses and pass a proctored final exam for each course. Designates must complete 30 hours of continuing education every 2 years.

# Information Required by Part 2B of Form ADV: Brochure Supplement – Matthew G. Hartman

The following are responses to each item found in the Form ADV Part 2B instructions.

# Item 1 – Cover Page

Matthew G. Hartman SA Financial Solutions, LLC 14100 San Pedro Avenue, Suite 418 San Antonio, Texas 78232 (210) 497-8743

This brochure supplement provides information about Matthew G. Hartman that supplements this Disclosure Brochure. Please contact SA Financial Solutions, LLC if you have any questions about the contents of this supplement.

Additional information about Matthew G. Hartman is available on the SEC's website at www.adviserinfo.sec.gov.

## Item 2 – Educational Background and Business Experience

Matthew G. Hartman – Born: 03/30/1978

#### Educational Background:

Texas A&M University, Bachelor's Degree – Psychology and Political Science, May 2001 Texas Tech School of Law – dates attended, August 2003 to May 2004 University of Houston Law Center – dates attended, August 2004 to December 2007

#### **Business Experience:**

SA Financial Solutions, LLC – Investment Advisor Representative

• March 2012 to Present

MGH Financial - Insurance Agent

November 2009 to Present

# Cichowski & Gonzales, PC

• February 2008 to November 2009

The Lewis Law Firm – Paralegal/Law Clerk

• October 2005 to January 2007

# Item 3 – Disciplinary Information

As previously stated in Item 9 of this Disclosure Brochure, I have never been subject to a legal or disciplinary event.

# Item 4 – Other Business Activities

Please refer to Item 10 of this Disclosure Brochure for information regarding my other business activities.

## Item 5 – Additional Compensation

Please refer to Items 10, 12, 14 and 19 of this Disclosure Brochure for information regarding additional compensation.

# Item 6 – Supervision

Gerhardt (Gary) Hartman is the Managing Member / Founder of SA Financial Solutions, LLC and ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the activities and services provided by the firm and its supervised persons.

As a part of Mr. Hartman's supervisory responsibilities he will review all transactions, review all correspondence prior to mailing, review all new account paperwork, oversee all marketing/advertising matters conduct annual compliance meetings, review client performance reports and client position reports, review outside business activities and gift and gratuity reports, and review any complaints that may be received.

Mr. Hartman's phone number is (210) 497-8743.

# Item 7 - Requirements for State-Registered Advisers - Legal and Financial Disclosure

SA Financial Solutions nor any of its associated persons have been the subject of any bankruptcies, client arbitrations, or similar legal disputes.