

**Disclosure of Conflicts of Interest**

In an effort to provide full and comprehensive disclosure in today's investment and regulatory environment, Hantz Financial Services, Inc. (HFSI) discloses the following: Recommendations in implementing a financial plan (Plan) will typically include the purchase of products or services offered through HFSI or its related entities. Clients are under no obligation to purchase any such product or service. In the event a client elects to implement a Plan, or any part of it, clients should understand and agree that the firm and planners will receive commissions and other fees (e.g., revenue sharing, marketing fees) in connection with those purchases. Fees charged for the Plan are for the Plan only and do not include additional compensation that will be earned by HFSI and the financial consultants for implementing the recommendations. For more information regarding our Planning services, please see the Hantz Financial Services, Inc. [Form ADV Part 2A Brochure, Item 14](#).

Clients should also understand that if they use the services of HFSI in connection with the sale or purchase of a security, HFSI will act as agent for another person in undertaking such sale or purchase. Such activities will result in the client paying sales commissions, mark ups or mark downs, 12b-1 fees, trailing fees, or service fees.

It is standard industry practice for broker/dealers to have marketing agreements with various product suppliers (e.g., mutual funds, annuity and insurance companies, limited partnerships). Marketing agreements generally provide for the payment of marketing fees to the selling broker/dealer in addition to stated commissions. These arrangements between the product companies and the selling broker/dealers to pay marketing fees are sometimes referred to as "preferred supplier" relationships. These fees are paid by the sponsoring company in part to help defray the cost incurred by the broker/dealer for marketing and training related to the product. Receipt by HFSI of the compensation described above results in a conflict of interest. General information regarding a specific product company's marketing agreements can be found in that product's prospectus. For further information regarding our Broker Dealer platform, please see the [HFSI Brokerage Relationship Guide](#).

When we provide investment advice regarding your Account, we are acting as "fiduciaries" within the meaning of federal securities laws, Title I of the Employee Retirement Income Security Act (ERISA), and/or the Internal Revenue Code, as applicable to your Account, which are laws governing investment advisory services and tax-qualified accounts. Our business model and investment-related services creates some conflicts with your interests, so with respect to tax-qualified accounts we operate under rules that require us to act in your best interest and not put our interests ahead of yours. We apply this same standard of professional conduct to all of our services and clients. For more information regarding our fiduciary standing please see the [HFSI Fiduciary Acknowledgement](#).

**Miscellaneous Compensation Received**

Compensation in this category includes, but may not be limited to, pens, pencils, cookies, candy, notepads, caps, clothing, meals, golf outings, event and seminar sponsorships, and tickets to various concerts and sporting events. This compensation is not based on a written agreement or sales performance requirement but is provided at the discretion of the product company and/or its representatives. HFSI's registered representatives are required to report such compensation in a log maintained in the firm's primary software system.

**Recurring Revenue Sharing/ Marketing Payments**

HFSI has entered into marketing agreements with certain product companies, such as, but not limited to, mutual funds or annuity and life insurance providers that allow it to receive incentive payments from those "preferred supplier" companies. The following lists contains the names of the preferred suppliers from which HFSI receives marketing payments. All marketing payments are paid exclusively to HFSI and are not shared with the financial professionals. The suppliers are divided into two (2) categories: (1) Broker-Dealer; and (2) Investment Adviser. The fees received from the following preferred suppliers are either a fixed fee that is not based on any account value or asset-under-management value or a fixed fee based on either the value of assets held with the preferred supplier or the aggregate assets-under-management.

Broker-Dealer	% or \$ Received	Criteria for Payments
Prudential Life Assurance Company	.065% - .425%	HFSI received .10% to .36% on the purchase payments made into Prudential contracts and .065% on HFSI's aggregate assets-under-management with Prudential Life Assurance Company.
Transamerica Life Insurance Company	.50%	HFSI/Hantz Agency, LLC received marketing support based on the total premium paid to Transamerica during the year.

<b>Jackson</b>	\$19,230.77	HFSI received a fee of \$19,230.77. HFSI received marketing support based on the total new sales made during the year. This does not include additional premium payments to existing contracts.
<b>Nationwide Life and Annuity Company</b>	.5% - 13%	HFSI received (i) .5% of Linked Benefit Products; (ii) 5% of an eligible term life product's first-year premium paid during the production year; (iii) 9% of an eligible fixed life product's first-year target premium paid during the production year; and (iv) 13% of an eligible variable life product's first-year target premium paid during the production period. HFSI also received 0.1% - 0.25% on variable life product assets for which it was named as the broker-dealer of record.
<b>Invesco Distributors</b>	.25%	HFSI received marketing support based on the average value of the aggregate assets-under-management with Invesco.
<b>Franklin Templeton Investments</b>	.20%	HFSI received marketing support based on the average value of the aggregate assets-under-management with Franklin Templeton and/or its Affiliate funds.
<b>AuguStar Life Insurance Company</b>	.25% - .60%	HFSI/Hantz Agency, LLC received .25% - .60% on the purchase payments made into AuguStar contracts.

<b>Investment Adviser</b>	<b>% or \$ Received</b>	<b>Criteria for Payments</b>
<b>Congress Asset Management Company</b>	\$100,000.00	HFSI received an annual fixed fee of \$100,000.00 paid quarterly. This fee is not based on the value of assets or sales of products.
<b>Franklin Templeton Investments</b>	.10% - .20%	HFSI received marketing support based on the average value of the aggregate assets-under-management with Franklin Templeton and/or its Affiliate funds.
<b>Brandes Investment Partners, L.P.</b>	\$50,000.00	HFSI received an annual fixed fee of \$50,000.00 paid quarterly. This fee is not based on the value of assets or sales of products.
<b>Segall Bryant &amp; Hamill, LLC</b>	\$30,000.00	HFSI received an annual fixed fee of \$30,000.00 paid quarterly. This fee is not based on the value of assets or sales of products.
<b>Polen Capital Management, LLC</b>	\$20,000.00	HFSI received an annual fixed fee of \$20,000.00 paid quarterly. This fee is not based on the value of assets or sales of products.

**HFSI clients do not pay any portion of the revenue sharing payments.** Nonetheless, there is a conflict of interest because HFSI and its shareholders will benefit financially from the revenue sharing payments received for recommending these products instead of products sold by non-preferred suppliers who do not pay marketing or training fees.

#### **Control Relationship Conflict of Interest**

Hantz Group, Inc. and an HFSI affiliate, which includes several of our firm's representatives and associated persons, hold a minority ownership interest in SMartX Technology Solutions, LLC. and, in their capacities as its shareholders, will receive as compensation such dividends and distributions if, as, and when declared by its board of directors from time to time.

Hantz Group, Inc. holds a minority ownership interest in Brooklyn Investment Group, LLC's parent company, Skopos Labs, Inc., and, in its capacity as a shareholder, will receive as compensation such dividends and distributions if, as, and when declared by Skopos Labs, Inc.'s board of directors from time to time.

For additional information regarding the Control Relationship conflicts, please see the Hantz Financial Services, Inc. [Form ADV Part 2A Brochure, Item 14.](#)



Copies of all HFSI disclosures are available on our website at [www.hantzgroup.com/disclosures](http://www.hantzgroup.com/disclosures). You may also contact your financial professional to obtain these documents.

**Other Compensation Received in 2024**

Hantz Agency, LLC receives compensation from Citizens Insurance Company based on the firm's premiums and loss ratio. In 2024, Hantz Agency, LLC received \$980,329.00 from Citizens Insurance Company.