

ITEM 1: COVER PAGE

Hantz Financial Services, Inc.

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Southfield, Michigan 48034

248.304.2855

www.hantzgroup.com

January 13, 2012

This brochure provides information about the qualifications and business practices Hantz Financial Services, Inc. If you have any questions about the contents of this brochure, please contact us at 248.304.2855. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Hantz Financial Services, Inc. is available on the SEC's web site at www.adviserinfo.sec.gov. Registration as an investment adviser does not imply a certain level of skill or training.

ITEM 2: SUMMARY OF MATERIAL CHANGES

This section summarizes material changes that have been made to our brochure since the date of its last version.

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INTRODUCTION

In this brochure, references to “we,” “us,” “our,” or “our firm” refer to Hantz Financial Services, Inc. Our related companies are referred to as our “affiliates.” Individuals who serve as directors, officers, and employees are referred to as “representatives” of our firm or our affiliates. Our firm’s clients and prospective clients are referred to as “you,” “your,” or “our clients.”

This brochure contains important information. We encourage you to read it carefully and to ask questions if there is any information that you do not understand. The format and content of this brochure have been prepared based on the instructions to Form ADV, Part 2A, which is prescribed for use by registered investment advisers under federal and state securities laws and related rules. Form ADV, Part 2A supersedes Form ADV, Part II.

ITEM 4: ADVISORY BUSINESS

We offer services as an investment adviser, a broker-dealer, and a mortgage broker. We offer investment advice to our clients through financial planning services. Our affiliates and our representatives offer other services described later in this brochure. We do not offer investment management services.

Hantz Financial Services, Inc. has been in business since June 23, 1998. We are owned by a parent company, Hantz Group, Inc., whose majority shareholder is John R. Hantz.

Advisory Services

Our financial planning and consulting services are offered in three different packages: (1) the Horizon Planning Service; (2) the Premier Planning Service; and (3) the Premier Business Planning Service.

For each of these service packages, we gather information through in-depth personal interviews with you. This may include one or more in-person meetings and/or telephone calls. We may gather information that includes, but is not limited to, your current financial position, future goals and attitudes toward risk and investment objectives. We ask you to fill out a client profile questionnaire that we will carefully review, along with all other documentation you supply. Because we only rely upon, and do not independently verify, the information you provide us, we need you to update information whenever it changes. Based on the information you provide, we will initially provide our advice in the form of a written financial plan. You should review the financial plan carefully and ask questions. The financial plan is designed to help you achieve your stated financial goals and objectives, but there can be no assurance that you will attain those goals and objectives because of many, many variables beyond our control.

If you choose to implement your financial plan, we recommend that you work closely with a team of qualified professionals, which may include a securities broker, insurance agent, tax advisor, accountant, and attorney. You are not obligated to use our services, or the services of our affiliates and representatives, to implement any part of your financial plan. If you choose to im-

plement our recommendations, you will incur additional costs that are not covered by our financial planning and consulting fees, as described below under the section heading “*Fees and Compensation.*”

Horizon Planning Service™

This package of our basic planning services typically includes an analysis and presentation of the following topics that are pertinent to individuals: financial position, protection planning, basic investment planning, retirement planning, estate planning (other than legal services), and income tax considerations (but does not include tax return preparation services). These basic financial planning services are all provided by us.

Premier Planning Service™

This package of our advanced planning services typically includes an analysis and presentation of the following topics that are pertinent to higher net worth individuals and business owners:

- Financial position (including assets and liabilities, income and expenses, and debt management);
- Asset protection planning (including disability income, survivor income, long term care, home, auto and liability insurance, business owner concerns);
- Investment planning (including asset allocation, accumulation goals, and education planning);
- Retirement planning (including income and expenses, lump sum distribution planning, and business owner concerns); and
- Estate planning (other than legal services).

This package includes income tax planning and tax return preparation by Hantz Tax & Business, LLC or another of our Tax and Business Consulting Affiliates specified in the Financial Planning and Consulting Services Agreement.

Premier Business Planning Service™

This package of our advanced planning services typically includes an analysis and presentation of the following topics that are pertinent to businesses and business owners:

- Business accounting services (including accounting and tax preparation);
- Entity structure (including liability, tax implications, and ownership and entity review);
- Executive compensation analysis (including selective benefits, ownership percentage, and key employees);
- Group benefits (including life, health, disability, employee education programs, and additional fringe benefits);
- Qualified retirement plans (including employer funded plans, employee funded plans, and maximum owner contributions); and

- Succession planning (including buy-sell and related key person insurance arrangements, transition strategies, and business valuation).

Specific services are selected by the client and specified in the Financial Planning and Consulting Agreement. These consulting services are provided by Hantz Tax & Business, LLC or the Tax and Business Consulting Affiliate specified in the Financial Planning and Consulting Services Agreement. All financial planning and investment advisory services are provided by Hantz Financial Services.

Termination of Services

You may terminate our services, without incurring any fee or penalty, within the first five business days after you sign our Financial Planning and Consulting Agreement. After the initial five-business day period, you or we may terminate the contract by giving five business days' written notice for any reason or no reason.

Upon termination of our Financial Planning and Consulting Agreement, we will refund your prepayment for services if no services have been performed. We typically will not refund client payments if we have already performed substantial services in the engagement. If you terminate our services after we have delivered the financial plan and performed our services, you are responsible to pay the remaining balance due.

ITEM 5: FEES AND COMPENSATION

Horizon Planning Service™

The annual fee for the Horizon Planning Service is \$360. This fee is renewable yearly if you wish to continue the financial planning and consulting services offered in this package. Additional information about the payment of our fees is described later in this section.

Premier Planning Service™

The annual fee for our Premier Planning Service generally starts at \$1,200. This fee is renewable yearly if you wish to continue the financial planning and consulting services offered in this package. This fee may be higher because of factors such as higher net worth, income, or the complexity of your tax issues. Upon request, we may negotiate fees based upon a variety of factors such as the complexity of your financial circumstances, any requests you may have affecting our cost of providing the services, the services we are providing for any related accounts, the longevity of our relationship, and the existence of any personal or family relationships. The actual fee for the service will be specified in the Financial Planning and Consulting Agreement. Information about the payment of our fees is described later in this section.

Premier Business Planning Service™

The fee for our Premier Business Planning Service generally starts at \$1,200. This fee is renewable yearly if you wish to continue the financial planning and consulting services offered in this package. This fee may be higher because of factors such as higher net worth, income, or the complexity of your tax issues, as well as the complexity, circumstances, and needs of the desired business consulting services. Upon request, we may negotiate fees based upon a variety of factors such as the complexity of your financial circumstances, any requests you may have affecting our cost of providing the services, the services we are providing for any related accounts, the longevity of our relationship, and the existence of any personal or family relationships. The actual fee for the service will be specified in your Financial Planning and Consulting Agreement. Information about the payment of our fees is described later in this section.

Additional Fee Information

You must pay our initial financial planning and consulting fees at the time you complete and sign the Financial Planning and Consulting Agreement. You may pay our fees in full by check or credit card. Alternatively, you may pay our fees in monthly installments through your bank from your checking account via the Automated Clearing House (ACH) Network. If you choose ACH, you must complete, sign and submit the ACH authorization form and give us a voided check from your checking account. We will only charge your account the specific installment amount stated in the ACH authorization form. Your bank will report the charge in your periodic bank account statement. You can terminate this ACH authorization at any time by notifying us or your bank. We are not responsible for any overdraft charges that you may incur for insufficient funds in your checking account. You are responsible for all fees that are not paid by ACH transfer.

We do not calculate or charge fees on the basis of a share of capital gains or capital appreciation of your funds or any portion of your funds.

California Residents: Rule 260.238(j) of the California Code of Regulations requires investment advisers to disclose that lower fees for comparable services may be available from other sources.

Renewal Fees

We will renew your Financial Planning and Consulting Agreement yearly until you terminate the contract. You may terminate the contract by sending us written notice. The renewal fees in your contract will apply unless changed by mutual agreement because of changes in the factors we described above that affect our cost of providing these services. Renewal fees are paid in the same manner as described above.

Third-Party Fees and Charges

You will incur additional fees and charges if you choose to implement our recommendations. Additional fees and charges typically include brokerage commissions, custodial fees, insurance commissions, and other transaction-related charges. We will provide you, in advance, with information about those additional fees and charges.

Fees and expenses charged by mutual funds or by insurance companies to their funds are separate and in addition to the fees we charge for our financial planning and consulting services. You will incur additional fees and charges at the fund level, if you purchase mutual fund shares or a variable insurance product. Each mutual fund's or variable insurance product's prospectus describes these fees and expenses. The additional fund-level fees may include, but are not limited to, a management fee, other fund expenses, mortality and expense risk charge or possible distribution fee. If the product imposes a sales charge, you may pay an initial or deferred sales charge.

Before investing, you should consider the total cost of fund-level fees, our advisory fees, and any transaction-related commissions or charges. You may choose to invest in mutual funds or variable insurance products directly, without our services.

Our representatives may receive continuing 12b-1 fees, sometimes called trail commissions, from mutual funds and insurance companies based on client funds held in those accounts. 12b-1 fees are described in each fund's prospectus. In addition, our firm receives marketing allowances and reimbursements from preferred suppliers, which may change from time to time. Recent marketing allowances and reimbursements are disclosed in our Conflicts of Interest disclosure or in the investment or insurance product's prospectus or brochure.

A copy of our Conflicts of Interest disclosure will be given to you in our new account documents when our relationship begins and annually thereafter. It is also available upon request, and can be found on the Hantz Group internet site, www.hantzgroup.com.

For additional information about the compensation we may receive if you use our services to implement our advice, see the discussion under the heading below, *Client Referrals and Other Compensation*.

Other Contract Terms and Amendments

We may unilaterally amend the Financial Planning and Consulting Agreement, including our fee schedule. We will send you written notice of a change at least 30 days before its effective date. There is no penalty to you if you choose to discontinue our services because of the change. Simply notify us in writing of your decision to terminate our services before the effective date. You will remain responsible for services performed prior to the termination date.

We will not "assign" the Financial Planning and Consulting Services Agreement to someone else without your consent, which you may give orally or in writing. We will imply your consent if all the following conditions are met: (1) We provide you at least 30 days' prior written notice of the proposed assignment; (2) we provide you with written confirmation that the assignment has occurred; (3) you do not respond objecting to the assignment; and (4) you do not terminate our services within 30 days after the effective date of the assignment.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Our fees are described above. We do not charge performance-based fees. We do not offer investment management services.

ITEM 7: TYPES OF CLIENTS

Generally, we provide our financial planning and consulting services to individuals and their related IRAs, trusts, as well as businesses and their related pension or retirement plans.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

In formulating the investment advice, we consider your personal circumstances, financial goals, investment objectives, risk tolerances, and time horizons based on the information you provide us. You must notify us of material changes to that information. We design our financial planning services to, among other things, assist you in selecting investment, insurance, and other financial products and services that are appropriate to your personal circumstances and financial objectives.

While our investment advice is designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of returns on investments entails accepting higher levels of risk. Our investment advice seeks to balance risks and rewards to achieve investment objectives. You need to ask questions about investment risks you do not understand. We would be pleased to discuss your questions.

All investments bear different types and degrees of risk. Insured bank deposits have little or no investment risk, but different types of mutual funds can have widely varying risks. Variable annuities include insurance provisions that may tend to reduce, but do not eliminate, investment risks. Insurance may have credit risk related to the insurance company's ability to pay claims. Securities that are not readily marketable on a stock exchange or over-the-counter through a broker-dealer have liquidity risks, meaning you cannot quickly sell the securities for cash. Important risks are disclosed in the prospectus or offering memorandum for securities such as mutual funds, variable annuities, and private placements. Read those documents carefully and ask questions about anything you do not understand.

We strive to render our best judgment on your behalf. Still, we cannot assure you that investments will be profitable or that no losses will occur. Past performance is an important consideration with respect to any investment but it is not a reliable predictor of future performance. Many, many economic, market, and other variables beyond our control can affect your investment performance.

ITEM 9: DISCIPLINARY INFORMATION

We entered into a settlement with the Office of Financial and Insurance Services, Michigan Department of Labor and Economic Growth, publicly reported on June 28, 2007. Without admitting or denying the agency's allegations, we agreed to resolve licensing concerns under Michigan's Mortgage Brokers, Lenders, and Services Act. We formally implemented compliance policies and procedures to better guide our mortgage department and we paid the agency a civil money penalty.

We and John Hantz entered into a settlement with the National Association of Securities Dealers, Inc. ("NASD"), publicly reported on August 11, 2005. Without admitting or denying the NASD's allegations, we agreed to resolve concerns under the Securities Act of 1933 and NASD Rules pertaining to, among other things, the firm's nondisclosure of incentives and compensation received from preferred supplier relationships and the failure of the firm and Mr. Hantz to establish and follow an adequate supervisory system. We hired an independent consultant to assist us in taking corrective actions, including developing better disclosures about our incentives, supplier relationships, and related incentives. Our firm and Mr. Hantz were censured, we each paid fines, and Mr. Hantz was suspended from acting in a supervisory capacity for 30 days.

We entered into a settlement with FINRA, publicly reported on January 4, 2012, arising out of a former registered representative's misconduct that we discovered, investigated, self-reported, and remedied with affected customers. Without admitting or denying FINRA's allegations, we agreed to resolve FINRA's concerns by taking additional corrective action in amending and implementing our written supervisory procedures for recording incoming checks and investigating customer complaints, accepting a censure, and paying a fine. FINRA noted our investigation was instrumental in exposing the manner of the representative's misconduct and in determining the extent of the representative's harm, for which we voluntarily reimbursed affected customers.

Information about these two matters is publicly available on the Investment Adviser Public Disclosure website at: <http://www.adviserinfo.sec.gov/>.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Our Other Activities

Besides being state-registered as an investment adviser, we are registered as a broker-dealer with the Securities and Exchange Commission ("SEC"), the State of Michigan, and other states. We are a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation.

We are also licensed in Michigan as a residential mortgage broker. As part of the financial planning process, we may make recommendations involving refinancing, debt consolidation, debt reduction, or mortgage-related strategies to help provide funds for retirement, children's education and other expenses. If we recommend mortgage financing or refinancing your existing debt, you are under no obligation to do so and you may obtain financing through any lender of your

choosing. If you choose to implement a mortgage strategy to generate investable funds, you will receive a disclosure pamphlet entitled, “Betting the Ranch: Risking your Home to Buy Securities” that outlines the risks associated with mortgaging your home.

We originate mortgages to an affiliated lender. This lender compensates us based on the loan amount. This compensation is disclosed on the good faith estimate and settlement statement disclosure forms required by the Department of Housing and Urban Development (“HUD”). We pay our licensed mortgage brokers based on the loan amount. This additional compensation creates potential conflicts of interest, further discussed below under the section heading “*Client Referrals and Other Compensation.*”

We may refer you to our other affiliates for various financially-related products and services to implement various aspects of our recommendations. You have no obligation to purchase their products and services. Purchasing their products and services indirectly benefits us. The products and services offered by our affiliates are available from similar service providers, some of which could be at a lower cost than our affiliates may charge.

Our Tax and Business Consulting Affiliates

Our Tax and Business Consulting Affiliates, listed below, provide the tax planning, consulting and, if applicable, tax return preparation services that are included in our service packages described above. Your Financial Planning and Consulting Agreement will specify, among other things, which of these firms will provide these services for you.

Beyond our service packages, these affiliates provide other accounting, tax, and business consulting services to our clients and to the general public. Many of our representatives work through these affiliates to provide tax, accounting, or consulting services as a CPA, a tax practitioner, or an IRS Enrolled Agent. An IRS Enrolled Agent is a tax practitioner authorized to represent taxpayers before the Internal Revenue Service.

Our Tax and Business Consulting Affiliates include: Hantz Tax & Business, LLC; Hantz Titus Urbanski, LLC; Hantz Rhoades & Doehrer, PLLC; and Hantz Ewald, LLC.

Our Parent Company and its Affiliates

We are a wholly owned subsidiary of Hantz Group, Inc., Southfield, Michigan. Through its various subsidiaries, Hantz Group is engaged in a variety of businesses that offer financial, investment, accounting, insurance, tax, and related services that are listed below. Hantz Group also owns other affiliates that are not financially-related businesses. Our directors and principal executive officers also serve in similar capacities with our affiliates and other Hantz-related companies. The amount of time they may devote in their executive and management capacities for these businesses varies as managerial time requirements may dictate.

Hantz Group is affiliated by common ownership with Hantz Holdings, Inc., a bank holding company headquartered in Southfield, Michigan (“Hantz Holdings”). Hantz Holdings owns Hantz Bank and Tranex Financial, Inc. (“Tranex”).

Hantz Bank is a full service, state-chartered, commercial bank headquartered in Davison, Michigan. The bank offers a full range of personal and commercial banking products and services. The bank may refer clients to us and other affiliates for the financially-related services described in this brochure. We have established a branch office to provide our financial planning and securities brokerage services on the bank's premises. We may refer you to the bank for banking-related services. Your purchasing the bank's products and services indirectly benefits us and our affiliates. Always bear in mind that, unlike the bank's federally-insured deposit products, the investment products and services we may offer you are—

- Not insured by the FDIC;
- Not a deposit or other obligation of, or guaranteed by, the bank; and
- Subject to investment risks, including possible loss of the principal amount invested.

Tranex is a mortgage broker and lender originating residential loans for its customers. It is a wholly-owned and controlled subsidiary of Hantz Holdings. Your obtaining a residential mortgage through Tranex indirectly benefits us and our affiliates.

Our Other Affiliates

Our other affiliates include, and are engaged in, these financially-related businesses:

- Hantz Agency, LLC, and PLUS Agency, LLC are insurance agencies.
- Hantz Benefits Services, LLC and Hantz Benefit Agency, Inc. are insurance agencies that offer individual and corporate benefit programs.
- Hantz Commercial Insurance Agency, LLC is an insurance agency that provides services such as property and casualty and workers' compensation to businesses.
- Hantz Consulting, LLC, prepares Qualified Domestic Relations Orders.

Our Representatives

Most of our representatives are registered or licensed to sell one or more financial products and services, including securities, insurance, and residential mortgages through our firm or one of our affiliates. You have no obligation to use the services of our representatives. Purchasing products and services through our representatives directly benefits them personally and benefits us because of the additional compensation we will receive in those transactions. Additional compensation creates potential conflicts of interests, discussed below under the section heading "*Client Referrals and Other Compensation.*"

When acting as insurance agents, our representatives use Hantz Agency, LLC, listed above, as their insurance agency and may represent one or more insurance companies. We are not affiliated by common ownership or control with any insurance company.

Other Relationships

One of our directors, David Shea, is a member of Shea, Aiello, Doxsie & Petz, PLLC, a general practice law firm. The law firm is not otherwise affiliated with us. If legal services are desired, the law firm can be retained for legal representation and services, including wills, trusts, estate plans, contracts, litigation, and various other legal matters.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

We have adopted a Code of Ethics. It expresses our core fundamental values to be honest, fair, and forthright in our dealings with clients and others in the conduct of our business. Our Code of Ethics also guides our practices in giving investment advice to our clients and proprietary trading of securities for our own and related accounts. A copy of our Code of Ethics is available upon request by contacting the firm at the number stated on this brochure's cover page.

Participation or Interest in Client Transactions

Our firm or our representatives may buy, sell, or hold for their personal accounts, sometimes called proprietary or personal securities trading, the same securities that we may recommend to you and other clients. Based on everyone's own personal circumstances, personal securities trading may be similar to or different than recommendations to you.

Most of our securities recommendations involve widely-held, publicly traded securities, mutual funds, or similar funds that are held inside variable insurance contracts. We generally do not give advice about thinly traded securities unless you happen to already hold those securities in your account. Accordingly, our investment advice and our personal securities trading have little potential to affect the price of the securities that we recommend. Our Code of Ethics and related policies address the potential conflicts of interest with respect to personal trading activities by our representatives.

Generally, our representatives may not purchase or sell a security prior to a transaction being completed for a client's account. We have this policy to prevent our employees from benefiting from transactions placed on behalf of a client's account. Because these situations have the potential of raising conflicts of interest, we have established the following trading restrictions:

- Our representatives may not use information available to them because of their employment with us to buy or sell securities for their personal portfolios, unless the information is also available to the investing public upon reasonable inquiry. A representative shall not favor his or her interests above your interests.
- We inform you that our representatives may receive separate compensation when implementing our financial plans.

- You have the unrestricted right to decline to implement any advice we render.
- You have the unrestricted right to choose any broker, dealer, or insurance company.
- We require our representatives to act in accordance with all applicable federal and state regulations that govern investment advisers and broker-dealers.
- A representative who violates these restrictions may be subject disciplinary action, up to and including termination.

ITEM 12: BROKERAGE PRACTICES

We are a registered broker-dealer. Most of our representatives are registered through us to handle securities brokerage transactions. Accordingly, we recommend our own brokerage services if you desire to implement our recommendations through the purchase or sale of any securities. Commissions, 12b-1 fees, and other compensation received from the implementation of our recommendations is in addition to our compensation from the financial planning and consulting fees described above.

You are never obligated to use our firm, our affiliates, or our representatives to implement our financial planning recommendations. Securities brokerage services are available from other sources at a lower cost; however, discount brokerage firms generally do not provide investment advice or other customer services that we can provide you.

ITEM 13: REVIEW OF ACCOUNTS

The frequency of our reviews of clients' accounts varies depending on your desired service level. Accordingly, you can specify the frequency of our reviews in your Financial Planning and Consulting Services Agreement.

We provide a financial plan that organizes and reports on the information you provide us. The Premier Planning Service and Premier Business Planning Services may also include deliverables as specified in the Financial Planning and Consulting Services Agreement.

We will conduct client meetings on at least an annual basis if you renew your Financial Planning and Consulting Services Agreement. More frequent reviews may be requested or may be triggered by material changes in your individual circumstances, or material changes in the market, political, or economic environment. Please promptly tell us when your personal circumstances change.

If you purchase investments, you will also receive periodic reports from the custodian for your accounts such as a clearing broker-dealer, investment company, or insurance company. We do not provide custodial services. We are an introducing broker-dealer for a clearing firm, South-

west Securities, Inc. Southwest Securities carries our clients' accounts. Mutual funds, insurance companies, and banks may also serve as a custodian for one or more of your accounts and they typically send account statements to you. We are not responsible for their services or the accuracy of their account statements. Like you, we rely upon their statements and reporting for accurate information.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

Our recommendations may include the purchase of products or services offered through our firm, our affiliates, and our representatives. You are under no obligation to purchase any recommended product or service. If you elect to implement any of our recommendations, we will receive commissions and other fees (e.g. revenue sharing, marketing fees) in connection with purchases made using our firm, our affiliates, and our representatives. Fees charged for our financial planning services do not include additional compensation that may be earned by our firm, our affiliates, and our representatives.

We believe that having access to a variety of services, products and providers presents us with an opportunity to offer you what we consider to be the "best of breed" because we do not create proprietary investment or insurance products. It is 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 us in addition to stated brokerage commissions and charges. These arrangements 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 us for marketing and training related to the product. This additional compensation results in conflicts of interests. Please see our Conflicts of Interest disclosure for additional information about the preferred supplier compensation we receive.

We may refer you to one or more of our affiliates, and they may refer clients to us for our financial planning, securities, and mortgage brokerage services. We do not pay them for referrals to us, and they do not pay us for referrals to them; however, when you purchase products or services from or through our affiliates, our firm and our introducing representatives also benefit from the additional compensation earned on your transactions. Please review the disclosures in this brochure under the section heading "*Other Financial Industry Activities and Affiliations*" for additional information about our affiliates and representatives.

Our representatives who are additionally employed as a registered representative, licensed insurance agent, or mortgage broker are able to implement our recommended securities, insurance, or mortgage transactions for you for additional fees and charges described above. Registered representatives and insurance agents who handle these transactions will receive additional compensation.

Additional compensation includes, but is not limited to various kinds of marketing materials and promotions such as pens, pencils, cookies, candy, notepads, caps, clothing, meals, golf outings, event and seminar sponsorships, and tickets to various concerts and sporting events. This com-

pensation is not based on a written agreement or sales performance, but is provided at the discretion of the product company or its representatives.

Our firm and our representatives may, from time to time, receive incentive awards, such as trips, for the recommendation/introduction of investment products, or other financial planning products. However, our representatives are required to report such compensation in their gift and gratuity log and on the monthly compliance report. The gift and gratuity log is monitored by our compliance department through its written policies and procedures. The receipt of these incentives may create the potential or appearance of a conflict of interest for us or our representatives regarding our recommendations.

ITEM 15: CUSTODY

While we may handle your funds or securities in purchasing or selling investments, insurance, or other financial products and services, we do not act as a custodian for your account. We promptly transmit your funds or securities to you or to your account custodian. We are an introducing broker-dealer. If you open a securities brokerage account, it will be held at the clearing brokerage firm that we use, Southwest Securities, Inc.

If you open an investment account, you will receive periodic statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review those statements and compare that information to the information we provide to you about your account. Please promptly review and ask any questions about your account statements.

ITEM 16: INVESTMENT DISCRETION

You can give us, in writing, instructions that guide, limit or restrict our investment recommendations. We do not offer discretionary or nondiscretionary investment management services. We do not implement any of our recommendations without your prior approval of the specific transaction, consistent with any limitations or restrictions you may have given us.

ITEM 17: VOTING CLIENT SECURITIES

We will not vote proxies for the election of corporate directors or other corporate actions described in companies' proxy statements. If you have questions about those matters, please do not hesitate to ask us. Typically, your account custodian will forward proxies and proxy statements to your address of record or to your designee.

ITEM 18: FINANCIAL INFORMATION

While we require the prepayment of our financial planning and consulting fees, described above, we perform our services within six months of your engaging us. We do not require or solicit prepayment of more than \$500 in fees per client six months in advance. We do not have discretionary authority over your account. As described above, we have temporary custody of your funds or securities when handling some transactions that you request but we do not have on-going or permanent discretionary authority or custody of your funds or securities. We have no financial condition that impairs our ability to meet our contractual and fiduciary commitments to you. We have not been the subject of any bankruptcy proceeding.

ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Principal Executive Officers

These are the principal executive officers and management persons for Hantz Financial Services, Inc. (“Hantz Financial”):

John R. Hantz, DOB: 1961

Education: Graduated from Northwood University in 1984 with B.A. in Economics. Graduate of Harvard University, Advanced Management Program in 1986. Honorary Juris Doctor, Northwood University in 2004.

Employment: Registered Representative (“Reg. Rep.”), Hantz Financial, from 6/99 to Present
President, CEO, Director of Hantz Group, Inc., from 6/98 to Present
President of Tranex Financial, Inc., from 6/98 to 3/05
President of Hantz Benefits Agency, Inc., from 6/98 to 4/05
President of Hantz Company, Inc., from 6/98 to 12/03
President, CEO, Director of Hantz Financial, from 6/98 to 8/05
Member, Board of Trustees, Northwood University from 4/01 to Present
Chairman, Board of Directors, Hantz Financial, from 2/06 to Present
Chairman, Board of Governors, Northwood University from 2001 to 2005
Sole Director of Hantz Holdings, Inc., from 11/04 to 5/10
Chairman, Board of Directors, Hantz Holdings, Inc., from 5/10 to Present
Chairman, Board of Directors, Davison State Bank from 5/10 to Present

John F. Machcinski, DOB: 1956

Education: Attended the University of Toledo

Employment: Reg. Rep, American Express Financial Advisors, Inc., 6/78 to 6/79
Field Trainer for American Express Financial Advisors, Inc., from 6/79 to 6/80
District Manager for American Express Financial Advisors, Inc., from 6/80 to 6/88
Field Vice President for American Express Financial Advisors from 6/88 to 10/97
Reg. Rep for IDS Life Insurance Company from 6/78 to 10/97
Reg. Rep for East-West Capital Corporation from 10/97 to 12/97
Reg. Rep for Vestax Securities Corporation 12/97-6/99

Reg. Rep for Hantz Financial, from 6/99 to Present
Senior Vice President of Hantz Financial, from 6/98 to 8/05
Secretary of Hantz Financial, from 4/02 to Present
President of Hantz Financial, from 9/05 to Present
Secretary of Hantz Group, Inc., from 4/02 to Present
Secretary of Tranex Financial, Inc., from 4/02 to Present
Secretary of Hantz Benefits Agency, Inc., from 4/02 to Present
Secretary of Modern Benefit, Inc., from 4/02 to 12/06
Secretary of Hantz Group Sports and Entertainment, LLC from 9/05 to Present
President of Hantz Group Sports and Entertainment, LLC from 10/07 to Present
Secretary of Hantz Agency, LLC from 4/02 to Present
Secretary of Hantz Air, LLC from 4/02 to Present
Secretary of Commercial Insurance Agency, LLC from 1/07 to Present
Secretary of Hantz Soccer USA, LLC from 9/06 to Present
Secretary of Hantz Indoor, LLC from 9/06 to Present
Member, Board of Directors, Hantz Financial, from 2/06 to Present
Secretary of Hantz Software, LLC from 1/08 to Present
Secretary of Hantz Lending, LLC from 12/06 to Present
Secretary of PLUS Agency, LLC from 2/07 to Present
Secretary of Hantz Group Racing, LLC from 4/06 to Present
Secretary of Hantz Soccer Camps, LLC from 3/06 to Present
Sole Director of Hantz Financial, from 8/05 to 1/06
Secretary of Hantz Benefits Services, LLC from 9/06 to Present
Secretary of Hantz Consulting, LLC from 8/07 to Present
Secretary of Hantz Farms, LLC from 9/08 to Present
Secretary of Hantz Real Estate Ventures, LLC from 5/10 to Present
Secretary of Hantz Holdings, Inc., from 4/08 to Present
Secretary of Goals & Giving, Inc., from 3/08 to Present
Secretary of Hantz & DiLaura Properties, LLC from 12/07 to Present

Lisa McClain, DOB: 1966

Education: Graduated from Northwood University in 1997 with a B.A. in Business

Employment: Reg. Rep for Hantz Financial, from 6/99 to Present

Senior Vice President of Hantz Financial, from 6/04 to Present

Michael O. Reid, DOB: 1962

Education: Graduated from Northwood Institute in 1984 with a B.A. in Business.

Graduated from Northwood University in 2002 with MBA in Business.

Employment: Reg. Rep for Hantz Financial, from 6/99 to Present

Senior Vice President of Hantz Financial, from 6/98 to Present

Charles F. Tourangeau, DOB: 1979

Education: Graduated from Western Michigan University in 2001 with a B.A. in Finance

Graduated from Northwood University in 2007 with a M.B.A.

Employment: Service Rep. for Charles E. Tourangeau State Farm Insurance Agency, 8/97 - 5/01
Reg. Rep for Hantz Financial from 6/01 to present
District Manager, Hantz Financial from 1/06 to 12/09
Senior Vice President, Hantz Financial, from 1/10 to present

Renee A. Yaroch, DOB: 1966

Education: Graduated from Eastern Michigan University in 1989 with a B.B.A in Finance.
Graduated from the University of Michigan, Executive MBA program in 2003.

Employment: Reg. Rep for Hantz Financial, from 6/99 to Present
Treasurer of Hantz Group, Inc., from 4/02 to Present
Treasurer of Tranex Financial, Inc., from 4/02 to Present
Treasurer of Hantz Benefits Agency, Inc., from 4/02 to Present
Treasurer of Modern Benefits from 4/02 to 12/06
Treasurer of Hantz Agency, LLC from 4/02 to Present
Treasurer of Hantz Air, LLC from 4/02 to Present
Treasurer of Hantz Commercial Insurance Agency, LLC from 1/07 to Present
President of Tranex Financial, Inc., from 9/06 to 6/07
Treasurer of Hantz Soccer USA, LLC from 3/06 to Present
Treasurer of Hantz Indoor, LLC from 3/06 to Present
Chief Financial Officer of Hantz Group, Inc., from 1/02 to Present
Treasurer of Hantz Financial, from 4/02 to Present
Treasurer of Hantz Group Racing, LLC from 4/06 to Present
Vice President of Operations for Hantz Financial, from 6/98 to 12/01
Treasurer of Hantz Soccer Camps, LLC from 3/06 to Present
Treasurer of Hantz Software, LLC from 1/08 to Present
Treasurer of Goals and Giving, LLC from 2006 to 3/2008
Treasurer of Hantz Group Sports & Entertainment, LLC from 2/06 to Present
Treasurer of Hantz Lending, LLC from 12/06 to Present
Treasurer of PLUS Agency, LLC from 2/07 to Present
Treasurer of Hantz Benefits Services, LLC from 9/06 to Present
Treasurer of Hantz Consulting, LLC from 8/07 to Present
Treasurer of Hantz Farms, LLC from 9/08 to Present
Treasurer of Hantz Real Estate Ventures, LLC from 5/10 to Present
Treasurer of Hantz Holdings, Inc., from 4/08 to Present
Member, Board of Directors, Hantz Holdings, Inc., from 5/10 to Present
Treasurer of Hantz & DiLaura Properties, LLC from 12/07 to Present

Debra A. Dombeck, DOB: 1961

Education: Attended Northwood University

Employment: Reg. Rep for Hantz Financial, 1998 to Present
Director of Brokerage Operations, Hantz Financial, from 1999 to 2006
Director of Operations for Hantz Financial, from 2006 to 2009
Chief Operating Officer for Hantz Financial, from 1/10 to Present

Kimberly Diane Poulos Hantz, DOB: 1962

Education: Graduated from Northwood University in 1984 with a B.A. in Marketing.
Graduated from University of St. Thomas, 1998, with a MBA in Human Resource Management.
Graduated from Keenesaw State University in 2005 with M.S. in International Relations.

Employment: Director of Administration Dow Lohnes Law Firm 7/96 to Present
Member, Board of Directors, Hantz Financial, from 2/06 to Present

Jeffery H. Soper, DOB: 1961

Education: Attended Alma College

Employment: Field Vice President, Ameriprise Financial Services, Inc. from 10/02 to 4/06
Senior Vice President, Hantz Financial, from 04/06 to Present

John F. Beebe, DOB: 1977

Education: Graduated from Northwood University in 2000 with B.A. in Marketing and Finance.
Graduated from Northwood University in 2004 with a MBA.

Employment: Reg. Rep for Hantz Financial, 5/00 to Present
District Manager, Hantz Financial, from 7/03 to 12/06
Vice President, Hantz Financial, from 1/07 to 6/09
Senior Vice President, Hantz Financial 1/10 to Present

Duane A. McCollum, DOB: 1979

Education: Graduated from Hope College in 2001 with a B.A. Graduated from Northwood University in 2009 with a MBA.

Employment: Reg. Rep for Hantz Financial, 2001 to Present
Senior Vice President, Hantz Financial, from 1/10 to Present

Edward E. Vettel, Jr., DOB: 1942

Education: Graduated from Michigan State University, 1965, with a Bachelor of Science degree.
Attended postgraduate masters studies at Wayne State University.

Employment: Reg. Rep for Hantz Financial, 06/2002 to Present
Director of Advanced Planning Hantz Financial from 06/2002 to 01/2008
Director of Advanced Planning Hantz Agency, LLC from 06/2002 to 01/2008
Vice President of Hantz Financial from 01/2008 to Present
Vice President of Hantz Agency, LLC from 01/2008 to Present
Chief Anti-Money Laundering Compliance Officer of Hantz Financial 02/2009 to Present
Chief Compliance Officer of Hantz Financial 06/2010 to Present

Jamie M. Racine, DOB: 1979

Education: Graduated from Eastern Michigan University in 2002 with a B.A. in Finance.

Employment: Reg. Rep for Hantz Financial, 9/02 to Present
Branch Manager, Hantz Financial, from 2008 to 2009
Senior Vice President, Hantz Financial, from 2009 to present

David J. Shea, DOB: 1962

Education: Graduated from Albion College in 1984 with a B.A. in History and Philosophy.
Graduated from University of Detroit School of Law in 1987 with a J.D.

Employment: Member/Partner of Mantese, Miller & Shea, PLLC from 2000 to 2002
Owner/Co-Managing Partner of Miller Shea, P.C. from 2002 to 5/06
Member, Board of Directors, Hantz Financial, from 2/06 to Present
Member, Managing Partner of Shea, Aiello, Doxsie & Petz, PLLC, 5/06 to Present

George W. Gregory, DOB: 1948

Education: Graduated from Michigan State University in 1972 with a B.A. in Economics.
Graduated from Wayne State University in 1976 with a M.B.A. in Accounting.
Graduated from Wayne State University Law School in 1980 with a J.D.

Employment: Associate and Shareholder in Lee, Gregory & Sternberg, P.C. 1986 to 2000
Member of George W. Gregory PLLC 2000 to Present
Member, Board of Directors, Hantz Financial, from 2/06 to Present

Other Businesses

For a description of our other businesses and the amount of time we spend on them, please see the discussion above under the section heading “*Other Financial Industry Activities and Affiliations.*”

Arbitration Awards; Civil and Administrative Proceedings

Please see the information provided above under the section heading “*Disciplinary Information.*”

Arrangements with Securities Issuers

For a discussion of the marketing and other incentives we receive from various investment and insurance companies, see the discussion above under the section heading “*Client Referrals and Other Compensation.*”

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