

# HARBORFRONT FINANCIAL GROUP

ALSO OPERATING AS:

CUSTER FINANCIAL ADVISORS

ADV Part 3 -Customer Relationship Summary (Form CRS)

January 17, 2025

## Item 1 – Introduction

Harborfront Financial Group, also doing business as Custer Financial Advisors, is an investment advisor registered with the Securities and Exchange Commission (“SEC”). Brokerage and investment advisory services and fees differ, and it is important for you, the *retail investor*, to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## Item 2 – Relationships and Services

### What investment services and advice can you provide me?

Our firm provides investment advisory services to you, the *retail investor*, including portfolio management, retirement planning, financial planning, and general consulting services.

*Investment Authority:* We manage investment accounts on a discretionary basis. A *discretionary account* allows us to buy and sell investments in your account without requiring your pre-approval on an ongoing basis until you notify us to change this arrangement. You may limit our discretionary authority (for example, limiting the types of funds that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

- Investment management
- Retirement planning
- Financial planning
- Selection of Other Advisors

*Monitoring:* Harborfront monitors your investments at least quarterly as part of our standard service.

*Account Minimums:* Harborfront does not have a minimum account requirement.

**For additional information**, about our services can be found in Items 4, 5 and 7 of our Disclosure Brochure and available to all clients or by searching our firm’s CRD Number (CRD# 331763) here: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Conversation Starters.** *Ask your financial professional:*

- “Given my financial situation, should I choose an investment advisory service? Why or why not?”
- “How will you choose investments to recommend to me?”
- “What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?”

## Item 3 – Fees, Costs, Conflicts and Standard of Conduct

### What fees will I pay?

Harborfront’s Investment Management fees are calculated as a percentage of assets under management and range from 0.95% to 3.0% for all investment management strategies. Our fees are generally assessed quarterly or monthly in advance and calculated by the value at the end of the previous calendar quarter. Some services offered by our firm assess fees in arrears with a frequency agreed between the client and Harborfront.

LPL Advisory Programs managed by Harborfront are wrap fee programs sponsored by LPL. A wrap fee program generally involves an investment account where Client is charged a single, bundled, or “wrap” fee for investment advice, brokerage services, administrative expenses, and other fees and expenses. Because Harborfront will be compensated the same amount whether an account participating in the wrap program is traded or not, we have a financial incentive to avoid trading the account. This creates a conflict of interest between Harborfront and its wrap Clients. Harborfront attempts to mitigate this conflict by requiring that the firm’s employees acknowledge their fiduciary duty to place client interests ahead of their own.

If you terminate your investment management agreement within a calendar quarter, fees will be reimbursed on a pro rata basis as soon as we are notified of the termination. If you engage CFA for investment management services within the calendar quarter, fees will not be charged until the following quarter.

Fees for our financial planning services and general consulting may be charged as a fixed fee or on an ongoing basis for continuous planning advice. Our fixed fees for financial planning and consulting services range between \$100 and \$7,000, depending on the complexity of the work. Fixed fees are billed quarterly in arrears based upon services rendered during the previous quarter.

*Description of Other Fees and Costs:* There are other fees and costs related to our investment advisory services and investments in addition to the principal fees and costs listed above that you will pay directly or indirectly. Examples of the most common fees and costs are insurance fees and mutual fund fees.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

**Additional information** about our fees can be found in Item 5 of our Disclosure Brochure and available to all clients or by searching our firm's CRD Number (CRD# 331763) here: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Conversation Starters.** *Ask your financial professional:*

- “Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?”

### **What are your legal obligations to me when acting as my investment adviser? How else does your firm make money, and what conflicts of interest do you have?**

*When we act as your investment adviser,* we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- Our Firm charges you asset-based fees, more assets in the account will cause you to pay more in fees and therefore we may have an incentive to encourage you to increase the amount of money invested in those accounts.
- Some of our investment advisor representatives are also dually registered as broker-dealer representatives and/or licensed insurance agents. This creates some conflicts on the products/services we may recommend to you. You are under no obligation to purchase securities or insurance products through any person affiliated with our Firm

**Additional information** about our conflicts of interest can be found throughout our Disclosure Brochure and available to all clients or by searching our firm's CRD Number (CRD# 331763) here: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Conversation Starters.** *Ask us the following questions:*

- “How might your conflicts of interest affect me, and how will you address them?”

### **How do your financial professionals make money?**

Our financial professionals are compensated by an annual salary/revenue from the LLC partnership. Our independent contractor financial professionals are compensated by a percentage of their assets under management. In addition, those investment advisor representatives that are also dually registered as broker-dealer representatives and/or insurance agents may receive additional compensation based on securities or insurance product sales.

## **Item 4 – Disciplinary History**

### **Do you or your financial professionals have legal or disciplinary history?**

No, neither we nor our financial professionals have a legal or disciplinary history. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Conversation Starters.** *Ask our financial professionals:*

- “As a financial professional, do you have any disciplinary history? For what type of conduct?”

## **Item 5 – Additional Information**

For additional information on our investment advisory services and to request a copy of the relationship summary, go to IAPD and search our firm's CRD Number (CRD# 331763) here: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). To obtain up-to-date information and request a copy of the Customer Relationship Summary, you may call: 231-843-1516.

**Conversation Starters.** *Ask your financial professional:*

- “Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?”
- “Who can I talk to if I have concerns about how this person is treating me?”

*Material Changes:*

- We included a conflict disclosure for wrap fees under Item 3
- We amended the CRS to reflect the other name Harborfront Financial Group is doing business under, Custer Financial Advisors