

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. This document provides a summary of the types of services we provide and how you will pay for them. Please feel free to reach out to us for additional information. Questions you might consider asking us are noted (→) throughout this Summary.

Introduction

The Humphreys Group is an investment adviser registered with the U.S. Securities and Exchange Commission. We have provided investment management services to retail investors since 2002. We provide advisory services to investment accounts. We do not provide services as a broker-dealer. There are differences between investment advisers and broker-dealers, and it is important for you to understand to decide what kind of account is right for you. You can learn more about the significant differences between investment advisers and broker-dealers at free and simple investor education websites provided by the Securities and Exchange Commission like <https://www.investor.gov> and <https://www.investor.gov/crs>.

What Investment Services and Advice Can You Provide Me?

Investment Management Services: If you request investment management services, we will:

- Tailor an investment approach for you that reflects your age, income, family circumstances, financial condition, retirement goals, investment goals, and your risk tolerance.
- Conduct periodic reviews of your goals and asset allocation in response to changes in the above factors.
- Provide ongoing monitoring of your investment accounts.
- Monitor market, economic, and geo-political trends.
- Review relevant financial industry research on a routine basis.
- Buy and sell securities for your accounts that are a part our Firm's investment strategy and that are consistent with your financial condition, goals, and risk tolerance.
- We will do so on a “discretionary” basis that authorizes us to trade without your approval of each trade.

Our Firm imposes a minimum portfolio size requirement of \$1,000,000 and a minimum annual management fee of \$10,000 for all new client relationships.

Financial Planning Services: Our financial planning services are integrated into our investment management services and depending on your needs, we will evaluate your financial condition, help you set financial goals and help you plan for retirement. Analyses may consider long-term sustainability, education funding, insurance needs, charitable giving, estate and tax planning and employer stock options. These services are offered on a stand-alone basis as well, under a separate written agreement.

Additional detail about our services is provided in our Form ADV Part 2A, Item 4.

- Given my financial situation, should I choose an investment advisory service and 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 your professional qualifications mean?

What Fees Will I Pay?

These are the principal types of fees you will pay to us in connection with our services:

- Asset-Based Fees: Investment management fees charged as a percentage of the value of the assets under our management. These are paid quarterly.
- Fixed Fees: Financial planning fees on a fixed fee basis are paid at the time the services are provided.
- Hourly Fees: Financial planning fees on an hourly fee basis are paid at the time the services are provided.

Our fees are negotiable and may vary amongst clients.

Other fees & costs you will pay to others in relation to your investments include:

- Custodian fees. If charged, these are paid to your custodian directly, on an annual or a monthly basis.
- Maintenance fees. If charged, these are paid to your custodian directly.
- Transactional and product-level fees (commissions). If charged, these are paid to your executing broker-dealer directly, at the time of each transaction.
- Fees related to Funds and Annuities. Mutual funds, exchange traded funds (ETFs), hedge funds, and variable annuity products may impose ongoing management fees, administrative fees and redemption or surrender fees. These are paid to the issuer of the fund or ETF or the insurer that issues the annuity directly.

The fee any investment adviser charges reduces the value of your account when it is deducted each billing period. Please make sure you understand what fees and costs you are paying. You will pay the asset-based fee each period even if no securities are bought or sold in your account. You will pay fees and costs whether you make or lose money on your investments. More detail about our fees is in our Form ADV Part 2A, Item 5.

➔ Help me understand how 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 remain in investment positions?

What Are Your Legal Obligations to Me When Acting as My Investment Adviser?

We have adopted an internal Code of Ethics. When we act as your investment adviser, we must act in your best interest and not put our interests ahead of yours. Where the interests of our Firm or staff conflict with our duties to you, we must work to eliminate the conflict or inform you of it in clear terms. You should understand these conflicts because they can affect the investment advice we provide you.

How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?

Here are examples to help you understand what this means:

- We charge fees for our services and the more assets there are in your account, the more you pay to us in fees. We therefore have an incentive to encourage you to increase the assets in your account.
- We may recommend that you rollover a 401K retirement account to an IRA account managed by our Firm and to invest in mutual funds, bonds and other securities rather than non-managed assets because these decisions increase the amount of assets under our management.
- We advise you to custody your investment accounts with Charles Schwab because it provides us with essential trading, reporting, compliance, education and back office services and investment research.
- Our employees personally invest in the same, or different securities based upon their personal financial situations and their investments may perform as well as, better or worse than our clients' investments.

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

How Do Your Financial Professionals Make Money?

Our professionals are paid a salary based upon their education, background and the level of skill and dedication they exhibit in their work for the Firm. Owners of the business share in its profits. Non-owner professionals participate in the Firm's bonus program in years in which bonuses are awarded.

Do You or Your Financial Professionals Have Legal or Disciplinary Histories?

No. We recommend that you visit <https://www.adviserinfo.sec.gov/> for a free and simple search tool to research our Firm and our financial professionals.

- ➔ As a financial professional, do you have any disciplinary history? For which type of conduct?
- ➔ Who is my primary contact person?
- ➔ Is she or he an Investment Adviser Representative or a Broker-Dealer Representative?
- ➔ Who can I speak with if I have concerns about how this person is treating me?

We encourage you to seek out additional information.

Visit <https://www.investor.gov/> that provides helpful educational materials to learn more about investing. For additional information on our advisory services, fees, conflicts and personnel, see our Form ADV Parts 1 and 2 on <https://www.adviserinfo.sec.gov/>. If you have any concerns or questions, or to obtain copies of our Form ADV Part 2 or Form CRS, contact us at 415-928-0401.