

**HANTZ FINANCIAL SERVICES, INC.**  
**Member FINRA / SIPC**  
**Disclosure of Possible 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) may 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 may 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 may be earned by HFSI and the financial consultants for implementing the recommendations.

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

HFSI's Operating Philosophy: We believe that having access to a variety of services, products and providers presents us with an opportunity to offer our clients what we consider to be the "best of breed", at any given time, as we are not a product manufacturer and we do not sell our own proprietary products.

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, or any related person, including the consultant, of the compensation described above may result in a conflict of interest. Information regarding specific marketing agreements can be found in the product's prospectus. Please read the prospectus thoroughly for more information.

**Disclosures Regarding HFSI Preferred Supplier Relationships**  
**And Its Mortgage Company Affiliate**

HFSI has entered into marketing agreements with certain product companies, such as mutual funds or annuity and life insurance providers that allow it to receive incentive payments from those "preferred supplier" companies. The following list contains the current names of the preferred supplier firms, the preferred supplier products that HFSI may recommend to its clients, and an estimate of the annual payments that HFSI has historically received from those companies for marketing and training support:

**MARKETING AND/OR PAYMENTS RECEIVED**

Product	Company	2016	2017	2018
Fixed Indexed/Variable Annuities	Prudential Life Assurance Corp.	\$1,454,176	\$1,347,842	\$1,457,404
Fixed Indexed/Variable Annuities	Transamerica Life Insurance Co.	\$ 226,290	\$ 121,113	\$ 103,170
Fixed/Fixed Index/Variable Annuities	Jackson National Life Ins. Co.	\$ 788,193	\$ 708,135	\$ 471,805
Mutual Funds	Transamerica/ IDEX	\$ 144,762	\$ 81,588	\$ 181,670
Mutual Funds	Invesco Distributors, Inc.	\$ 667,412	\$ 592,866	\$ 501,790
Mutual Funds	Legg Mason Investor Svcs, LLC	\$ 179,921	\$ 242,449	\$ 152,825
Life Insurance/ VUL	Nationwide Life and Annuity Co.	\$1,092,237	\$ 979,146	\$ 1,228,015
Limited Partnership/Private Placement	Bourne Health Care Properties, LLC.	\$0	\$76,399	\$74,810
Mutual Funds, ETFs Separately Managed Accounts	Charles Schwab & Co., Inc.	\$250,000	\$250,000	\$150,000

These payments are currently based on the following criteria:

**Prudential Life Assurance Corporation (f/k/a American Skandia):** Prudential Life Assurance Corporation pays marketing fees to HFSI that are calculated based on a stated percentage of each initial purchase payment and additional purchase payments, as applicable, on contracts sold by registered representatives with HFSI. The percentage paid is .36% (36 basis points). In addition, Prudential Life Assurance Corporation currently pays HFSI .065% (6.5 basis points) annually on assets under management.

**Transamerica Life Insurance Co:** Transamerica Life pays marketing, support and training fees of .50% of net sales made during the year.

**Jackson National Life Fixed/Indexable Variable Annuities:** Jackson National pays .25% (25 basis points) of the amount invested for new sales.

Transamerica Funds (f/k/a Transamerica IDEX Mutual Funds): Transamerica Funds pays a marketing fee of .45% (45 basis points) of the net sales and .05% (5 basis points) for total assets under management.

Nationwide Life and Annuity Co: Nationwide (NW) pays a marketing support fee of 9% of the annual target premium paid on variable life insurance products, plus an additional payment of .25% (25 basis points) of HFS clients' assets under NW management. NW pays a marketing support fee of 5% of the annual target premium on fixed life insurance products.

Bourne Health Care Properties, LLC: Bourne Health Care Properties, LLC pays a marketing support fee of one percent (1.0%) on completed sales of Units.

Invesco Distributors, Inc.: Pays a quarterly fee at the annual rate of up to 0.25% (25 basis points) of the average value of the Invesco Balanced Risk Allocation Fund (ABRZX) Class A Fund shares, Invesco Balanced Risk Allocation Fund (ABRYX) Class I Fund shares Invesco International Growth Fund (AIIEX) Class A Fund shares, Invesco International Growth Fund (AIIYX) Class I Fund shares, Invesco Global Growth Fund (AGGAX) Class A Fund shares, Invesco Global Growth Fund (AGGYX) Class I Fund shares, Invesco Small Cap Equity Fund (SMEYX) Class I Fund shares, Invesco Small Cap Equity Fund (SMEAX) Class A Fund shares, Invesco American Value Fund (MSAVX) Class A Fund shares, Invesco American Value Fund (MSAIX) Class I Fund shares and Invesco Equity and Income Fund (ACEIX) Class A Fund shares, Invesco Equity and Income Fund (ACETX) Class I Fund shares in HFSI's accounts on the books of Invesco Distributors, Inc. or its affiliate as of the end of such quarter.

Legg Mason Investor Services, LLC: Legg Mason BW Absolute Return Opportunities Fund Class A Fund shares and Legg Mason BW Global Opportunities Bond Fund Class A Fund shares pay a quarterly fee at the annual rate of up to 0.10% (10 basis points) and Legg Mason ClearBridge Series Funds Class A shares (excluding the ClearBridge Small Cap Growth Fund Class A shares) pay a quarterly fee at the annual rate of up to 0.20% (20 basis points) of the average net asset value in HFSI's accounts on the books of the Funds or their affiliate as of the end of such quarter.

Charles Schwab & Company, Inc.: Charles Schwab & Company, Inc. offers Hantz Financial Services, Inc. assistance in the amount of up to \$150,000 to be used towards technology related expenses.

Although HFSI clients do not pay any portion of the revenue sharing payments, there is a potential conflict of interest because HFSI and its shareholders may 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.

#### MORTGAGE COMPANY AFFILIATE

Hantz Bank is a wholly-owned and controlled subsidiary of Hantz Holdings, Inc., a sister company of Hantz Group, Inc. Hantz Bank is a mortgage broker and lender originating residential loans for its customers. Hantz Financial Services, Inc. (HFSI) is a licensed mortgage broker with the State of Michigan. Effective April 1, 2009 only individuals who are licensed with the State of Michigan as "Loan Officers" can be compensated for mortgage business. HFSI Loan Officers assist their clients in the mortgage application process by providing information about mortgage product options, by disseminating the various mandatory HUD disclosure forms, and by collecting the necessary documentation. Hantz Bank employees subsequently handle the underwriting process, credit analysis, and loan decision.

#### OTHER MARKETING PAYMENTS RECEIVED IN 2018

Hantz Commercial Insurance Agency, LLC	Citizens Insurance Co	\$ 31,768
Hantz Agency, LLC	Encompass	\$ 0
	Frankenmuth	\$ 132,302
	Massachusetts Mutual	\$ 0
	Citizens Insurance Co.	\$ 2,877,019
	Lincoln National Life Insurance Co.	\$ 0

#### 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.