# **Hawkins Capital Advisors**

A California Registered Investment Advisor

Hawkins Capital Advisors 5119 Marvale Drive Los Angeles, CA 90043

(323) 389-7171 www.hcapitaladvisors.com

Form ADV Part 2 Advisory Brochure March 15, 2020

This brochure provides information about the qualifications and business practices of Hawkins Capital Advisors. If you have any questions about the contents of this brochure, please contact Craig Hawkins, Supervisory Principal, at (323) 389-7171.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or any state securities administrator. Additional information about Hawkins Capital Advisors is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Advisor Search" link and then search for "Investment Advisor Firm" using the firm's IARD number, which is 164534.

While the firm and its associates may be registered with the State of California, that registration does not imply an endorsement by any regulatory authority, nor imply a certain level of skill or training on the part of the firm or its associated personnel.

# **Item 2 - Material Changes**

The firm has amended its Form ADV Part 2A from the previous version dated February 8th, 2019 to report the firm's assets under management as of its most recent fiscal year-end, December 31, 2019; to disclose tax preparation services offered by the principal; and to disclose new outside business activities of the firm's principal. Please see Item 4 and Item 19 for these amendments.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: www.adviserinfo.sec.gov or may contact our firm at (323) 389-7171 to request a copy at any time.

#### **Important Information**

Throughout this document, Hawkins Capital Advisors shall also be referred to as the "firm," "our," "we" or "us." These terms are utilized for the reader's ease of use while reviewing the brochure and are not meant to imply the firm may be larger than it actually may be. The client or prospective client may be also referred to as "you," "your," etc., and refers to a client engagement involving of a single *person* as well as two or more *persons*. The term "advisor" and "adviser" are used interchangeably where accuracy in identification is necessary (i.e., Internet address, etc.).

This brochure contains 30 pages and is not complete without all pages.

# <u>Item 3 – Table of Contents</u>

Topic Item 1:	Cover Page	<u>Page</u> 1
Item 2:	Material Changes	2
Item 3:	Table of Contents	3
Item 4:	Advisory Business  Description of the Firm  Description of Advisory Services Offered  Client-Tailored Services and Client-Imposed Restrictions  Wrap Fee Programs  Client Assets Under Management	<b>5</b> 5 8 8 9
Item 5:	Fees and Compensation Method of Compensation and Fee Schedule Client Payment of Fees Additional Client Fees Charged Prepayment of Client Fees External Compensation for the Sale of Securities to Clients	<b>9</b> 10 11 11
Item 6:	Performance-Based Fees and Side-By-Side Management	12
Item 7:	Types of Clients	12
Item 8:	Methods of Analysis, Investment Strategies and Risk of Loss Methods of Analysis and Investment Strategies Investment Strategy and Method of Analysis Material Risks Security Specific Material Risks	<b>13</b> 13 13 14
Item 9:	Disciplinary Information	16
Item 10	: Other Financial Industry Activities and Affiliations  Material Relationships Maintained by this Advisory Business and Conflicts of Interest Recommendation or Selection of Other Investment Advisors and Conflicts of Interest	<b>16</b> 16 17
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading Code of Ethics Description Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest	17 17 19 19
Item 12	: Brokerage Practices	20
	Factors Used to Select Broker-Dealers for Client Transactions Best Execution Directed Brokerage Aggregating Securities Transactions Trade Errors	20 21 21 21 22

<u>Topic</u>	<u>Page</u>
Item 13: Review of Accounts  Schedule for Periodic Review of Client Accounts or Financial Plans and Persons Involved Review of Client Accounts on Non-Periodic Basis  Content of Client Provided Reports and Frequency	22 22 22 23
Item 14: Client Referrals and Other Compensation  Economic Benefit from External Sources and Conflicts of Interest  Advisory Firm Payments for Client Referrals	<b>23</b> 23 24
Item 15: Custody	24
Item 16: Investment Discretion	25
Item 17: Voting Client Securities  Proxy Voting Other Corporate Actions Receipt of Materials	25 25 25 26
Item 18: Financial Information  Balance Sheet  Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commit  Bankruptcy Petitions during the Past 10 Years	26 26 tments to Clients 26 26
Item 19: Requirements for State-Registered Advisers	26
Principal Executive Officers and Management Persons Other Business Activities Additional Compensation Material Relationships with Issuers of Securities Disciplinary Information Supervision	26 27 27 28 28 28
Requirements for State-Registered Advisers	28

# **Item 4 - Advisory Business**

# **Description of the Firm**

Craig Alvin Hawkins is a sole proprietor operating the California-domiciled registered investment advisor doing business as Hawkins Capital Advisors. Due to the firm's legal structure it is not a subsidiary of, nor does it control, another industry entity. In addition to the firm's 2012 registration with the State of California, Mr. Hawkins and others who may be associated with his firm may register or meet certain exemptions to registration in additional jurisdictions in which investment advisory business is conducted. Mr. Hawkins also serves as the firm's supervisory principal, and further information about his background may be found in Item 19 of this brochure.

# **Description of Advisory Services Offered**

Hawkins Capital Advisors provides a range of investment advisory solutions to its clients. For those interested in areas such as cash flow and budgeting, education funding, retirement planning, risk management and estate planning, as well as periodic investment advice, we provide our financial planning and investment consultation services. We also provide ongoing and continuous supervision of clients' portfolios through our investment supervisory services offering.

To begin, an introductory interview is provided by a qualified representative of our firm to determine the scope of services for your engagement. During or prior to your first meeting, we will provide you with our current ADV Part 2 advisory brochure<sup>1</sup> that also describes our privacy policy. The firm will also ensure any material conflicts of interest are disclosed regarding our firm and its associates that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage our firm for its services, we must first enter into a written agreement; thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, we may require current copies of the following documents early in the process:

- · Wills, codicils and trusts
- Insurance policies
- Mortgage information
- Tax returns
- Current financial specifics including W-2s or 1099s
- Information on current retirement plans and benefits provided by your employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Completed risk profile questionnaires or other forms provided by our firm

It is important that the information and financial statements you provide is accurate. We may, but are not obligated to, verify the information you have provided, which will then be used in the financial planning or investment advisory process.

<sup>&</sup>lt;sup>1</sup> In consonance with the SEC's 2010 *General Instructions for Part 2 of Form ADV* (page 22) a consolidated Form ADV Part 2 is provided that includes requisite principal executive personnel information.

#### Financial Planning and Investment Consultation Services

Our services may be broad-based (sometimes coined "comprehensive planning") or more narrowly focused as you desire. If several or all of the services described are provided together through a broad-based plan, the total time needed to complete these services may be less than the time it would take to complete each service separately because of the efficiency gained by combining more than one service.

# Cash Flow and Debt Management

We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

#### Risk Management

Our services include an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care. Advice is provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential costs of not purchasing insurance (self-insuring).

# **Employee Benefits**

We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible in your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

# Retirement Planning

Our retirement planning services typically include projections of your likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, we may make recommendations that include showing you the impact on those projections by making changes in certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

#### <u>Tax Planning Strategies</u>

While the firm itself does not offer tax preparation services, the firm's principal is engaged in tax preparation as an outside business activity; please see Item 19. With your written permission, the firm will work with your professional to assist in structuring your financial life to identify tax-saving opportunities. In this event we will need authorization to share data from the client (See client Agreement. The client is under no obligation to engage with Craig A. Hawkins for the outside business activity of Tax Preparation, and the firm is not engaged in tying the services. Our advice includes ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with considera-

tion that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

# **Education Planning**

Our college funding advisory services may include projecting the amount that will be needed to achieve post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and advice might also include the "pros-and-cons" of various college savings vehicles that are available.

#### **Estate Planning**

This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

#### **Investment Consultation**

Our investment consultation services may involve providing information on the types of investment vehicles available, employee stock options, investment analysis and strategies, asset selection and portfolio design, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian (collectively, we term as "service providers"). The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

#### Periodic Review

We strongly urge our clients to notify us of any change in their circumstances, and to schedule a review any time there is such a change. An annual review should be considered even if there is not a substantial change, because tax laws, estate laws, and insurance and investment products are rapidly evolving.

In all instances involving our financial planning and investment consultation services, our clients retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make.

# **Investment Supervisory Services**

You may also engage our firm to implement investment strategies that we have recommended to you. Depending on your risk profile, needs, among other considerations, your portfolio may involve the employment of one or more investment strategies, as well as either a broad range or more narrowly focused choice of investment vehicles which is described in further detail in Item 8 of this brochure.

We provide our investment supervisory services under either a discretionary or non-discretionary agreement (further defined in Item 16), and our services may include the following:

- Risk tolerance assessment
- Investment strategy

- Investment policy statement development
- Asset allocation
- Asset selection
- · Regular portfolio monitoring
- Periodic rebalancing

Where appropriate, we will prepare an investment policy statement (IPS) or similar document reflecting your investment objectives, time horizon, tolerance for risk, as well as any account constraints you may have for the portfolio. Your IPS will be designed to be specific enough to provide future guidance while allowing flexibility to work with changing market conditions. Since the IPS, to a large extent, will be a product of information and data you have provided, you will be responsible for reviewing and providing final approval of the document/plan.

# **Educational Workshops**

We may provide educational workshops at no cost to attendees on an "as announced" basis for groups desiring general advice on investments and personal finance. Topics may include issues related to financial planning, educational and estate planning, retirement strategies, or various other economic and investment topics. Our workshops are educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one person's need nor do we provide individualized investment advice to attendees during our general sessions.

# **Client-Tailored Services and Client-Imposed Restrictions**

# Broad-Based v. Modular Planning

A broad-based plan is an endeavor that requires detail, therefore, certain variables can affect the cost involved in the development of the plan: the quality of your own records, complexity and number of current investments, diversity of insurance products and employee benefits you currently hold, size of the potential estate, special needs of the client or their dependents, among others.

While certain broad-based plans may require 10 or more hours to complete; complex plans may require more than 20 hours to complete. Alternatively, we may concentrate on reviewing only a specific area (modular planning), such as college funding, a portfolio allocation, or evaluating the sufficiency of your retirement plan. Note that when these services focus only on certain areas of your interest or need, however, your overall situation or needs may not be fully addressed due to limitations you may have established. Whether a broad-based or modular plan, we will present you with a summary of our recommendations, guide you in the implementation of some or all of them, and offer periodic reviews thereafter (see Item 13).

Unless stated otherwise in your agreement with our firm, upon completion of our presentation or delivery of advice through this form of advisory service, our financial planning and investment consultation engagement is typically concluded. You are encouraged to contact our firm at any time in the future to re-engage our services.

#### **Investment Account Restrictions**

As noted in your IPS or similar document, we will account for any reasonable restrictions you may require for the management of your investment account(s). For example, a client may prefer to avoid or require certain types of stocks in their portfolio whenever practical. We want to note that it will remain your responsibility to promptly notify us if there is any change in your financial situation and/or investment objectives for the purpose of our reviewing, evaluating or revising previous account restrictions or firm investment recommendations.

#### **Wrap Fee Programs**

Our firm does not sponsor or serve as a portfolio manager in any investment program involving wrap fees.

# **Client Assets Under Management**

As of December 31, 2019 our firm provided its investment supervisory services to approximately \$3,240,000 of client assets<sup>2</sup> under a discretionary account management agreement (defined in Item 16).

# **General Information**

Hawkins Capital Advisors does not provide legal or accounting services. With your consent, we may work with your other advisors (attorneys, accountant, etc.) to assist with coordination and implementation of accepted strategies. You should be aware that these other advisors will charge you separately for their services and these fees will be in addition to our advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. Hawkins Capital Advisors cannot warrant or guarantee any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account.

Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that a client may have under federal and state securities laws.

# **Item 5 - Fees and Compensation**

#### Method of Compensation and Fee Schedule<sup>3</sup>

# **Hourly Fees**

We may be engaged for our financial planning and investment consultation services under an hourly fee arrangement. The hourly rate is based upon the scope and complexity of your engagement. Fees for these services range from \$150 to \$350 per hour; billed in 15-minute increments (four increments per hour), and a partial increment (i.e., eight minutes, etc.) will be treated as a whole increment.

# **Fixed Fees**

Our financial planning and investment consultation services are provided on a fixed-fee basis; typically ranging from \$1,500 to \$15,000. The fee will take into consideration such factors as the estimated amount of

<sup>&</sup>lt;sup>2</sup> The term "assets under management" and rounding to the nearest \$100,000 are as defined by the SEC's 2010 *General Instructions* for Part 2 of Form ADV.

<sup>&</sup>lt;sup>3</sup>We reserve the right to discount our advisory fee for associates of our firm and their immediate family.

time dedicated to the engagement, the complexity of your project, your financial profile, number and type of accounts involved, and any special requests you may require.

We may also assess a fixed fee for our educational workshops that is payable by the sponsor, such as an association or employer. The fee is typically \$200 per workshop and will depend on the length of the event, its location and whether there are additional speakers. The fee is negotiated with the sponsor and generally due in advance of the presentation.

#### **Asset-Based Fees**

Accounts that we serve under an investment supervisory services agreement will be assessed an annualized asset-based fee that will be calculated based on the reporting period end value. Fees will be billed monthly, in arrears, based on the following table.

Assets Under Management	Asset-Based Fee Range*
\$0 - \$500,000	1.25% (125 basis points)
\$500,001 - \$1,000,000	1.00% (100 basis points)
\$1,000,001 - \$5,000,000	0.85% (85 basis points)
\$5,000,001 - Above	0.60% (60 basis points)

<sup>\*</sup>Minimum fee of \$350 per year.

For the benefit of discounting your asset-based fee, we may aggregate investment supervisory services accounts for the same individual or two or more accounts within the same family, or accounts where a family member has power of attorney over another family member's or incompetent person's account. Should, however, investment objectives be substantially different for any two or more household accounts, requiring different investment approaches or operational requirements, we do reserve the right to apply our fee schedule separately to each account.

# Negotiable Fees

The services to be provided to you and their specific fees will be detailed in your engagement agreement. Our published fees may be discounted by our firm but are not negotiable.

We strive to offer fees that are fair and reasonable in light of the experience of the firm and the services to be rendered. Similar services may be made available from other providers, and potentially at a lower fee.

# **Client Payment of Fees**

#### **Hourly and Fixed Fees**

Fees may be paid by check, bank draft, or single transaction debit card or credit card authorization through a qualified, unaffiliated third-party service. We do not accept cash, money orders, or similar forms of payment for our engagements.

Fees are generally due upon your receipt of our invoice. Non-continuous service engagements that are greater than 30 days in duration may be billed monthly, in arrears. Interest at 10% per year will be assessed on balances more than 60 days past due.

#### **Asset-Based Fees**

Annualized asset-based fees for investment supervisory services will be billed monthly, in arrears. Your first billing cycle will begin once your agreement is executed and your account is funded; fees for a partial month will be prorated accordingly. Fee payments will generally be assessed within five days of each billing cycle.

Accounts will be valued in accordance with the values disclosed on the statement the client receives from the custodian for the purpose of verifying the computation of the advisory fee. In the rare absence of a market value, we may seek an independent third-party opinion or a good faith determination by a qualified associate of our firm.

By signing the firm's advisory agreement, as well as the selected account custodian agreement, the client will be authorizing the withdrawal of transactional (see following section) and investment supervisory services fees from their account. All fees will be clearly noted on account statements and we will send you written notice of the fees to be deducted from your account; this includes the total fee assessed, covered time period, calculation formula utilized, and the assets under management on which the fee has been based. Please note that you share in the responsibility to verify the accuracy of fee calculations; the custodian may not verify the accuracy for you. The withdrawal of these fees will be accomplished by the selected custodian, not by our firm, and the custodian will remit our investment supervisory services fee to our firm.

Should a client's investment supervisory services account be held by a custodian with whom our firm does not maintain an agreement, we will invoice either the client or their custodian for the fee payment within five days of each billing cycle. The invoice will include the total fee assessed, covered time period, calculation formula utilized, and the basis for the fee according to the contract. The invoice payment will be due upon receipt.

#### **Additional Client Fees**

Any custodial or transactional fees (sometimes termed *brokerage fees*) assessed by selected service providers, individual retirement account fees, or qualified retirement plan account termination fees will be borne by the accountholder and are per those provided in current, separate fee schedules of any selected service provider. Fees paid by our clients to our firm for our advisory services are separate from any transactional charges a client may pay, as well as those for mutual funds, exchange-traded funds (ETFs), exchange-traded notes (ETNs), or other investments of this type.

Further information about our fees in relationship to our business practices are noted in Items 12 and 14 of this document.

#### **Charged Prepayment of Client Fees**

# **Advance Payment for Certain Services**

We may require an initial deposit of up to one half of your engagement fee for our financial planning and investment consultation services, which will be defined in your agreement. Workshop fees are to be paid in advance of the first session.

#### **Termination of Services**

Either party may terminate the agreement at any time, which will typically be in writing. Should you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute.

If our ADV Part 2 advisory brochure was not delivered to you at least 48 hours prior to entering into the investment advisory contract, then you have the right to terminate the engagement without penalty within five business days after entering into the agreement. Should you terminate an engagement after this date, you may be assessed fees for any time or charges incurred by our firm in the preparation of your plan or investment allocation, and/or the number of days your investment account had been under the firm's supervision. We will promptly return any unearned amount upon receipt of a written termination notice.

However, should an educational workshop be canceled by the sponsor within 48 hours of the scheduled event, the prepaid fee will either be applied to a future presentation or, depending on the type and level of pre-session preparation that had been required, not refunded at all.

For those clients who utilize our investment supervisory services, our firm will not be responsible for future allocations, transactional services or investment advice upon receipt of a termination notice. Upon termination, it will be necessary that we inform the custodian serving the account that the relationship between the firm and the client has been terminated.

# **External Compensation for the Sale of Securities to Clients**

Our firm and any affiliated associate are engaged for fee-only services and we attempt to recommend "no load" investments whenever appropriate. We do not charge or receive a commission or mark-up on your securities transactions, nor will the firm and our associates be paid a commission on your purchase of a securities holding that we recommend.

We do not receive "trailer" or "12b-1" fees from an investment company we may recommend. Fees charged by issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

You will always have the option to purchase recommended or similar investments through your own selected service provider.

#### Item 6 - Performance-Based Fees and Side-By-Side Management

Our fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as "performance-based fees." Performance-based compensation creates an incentive for a firm or their representatives to recommend an investment that may carry a higher degree of risk to a client. We do not use a performance-based fee structure because of the conflict of interest this type of fee structure poses.

Our fees will not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it may pose, does not conform to our firm's practices.

# **Item 7 - Types of Clients**

We provide our advisory services to individuals, trusts, estates; as well as charitable foundations, businesses of various scale and their pension and profit sharing plans.

Our ability to provide our advisory services depends on access to important information about our clients. Accordingly, it is necessary that you provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including but not limited to source of funds, income levels, your (or your legal agent's) authority to act on behalf of the account, among other information. This helps us determine the appropriateness of our financial planning or investment strategy for you.

It is also very important that you keep us informed on significant changes that may call for an update to your financial and investment plans. Events such as job changes, retirement, a windfall, marriage or divorce, or the purchase or sale of a home or business can have a large impact on your circumstances and needs. We need to be aware of such events, so we can make the adjustments needed to your plan or advice in order to keep you on track toward your goals.

Our firm does not require minimum income levels, minimum level of assets or other conditions for its services. As noted in Item 5, we require a minimum fee of \$350 per year for our investment services accounts. The firm reserves the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or pre-existing relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

#### <u>Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss</u>

#### **Methods of Analysis and Investment Strategies**

#### Method of Analysis

If we are engaged to provide investment advice, we will first gather and consider several factors, including your:

- current financial situation
- current and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance for risk
- restrictions, if any, on the management of your portfolio

We may employ fundamental analyses; evaluating economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. In addition to our own research, the firm's recommendations may also be drawn from research sources that include investment analysis and reporting software, materials from economists and other industry professionals, company press releases, annual reports, prospectuses and regulatory filings.

We make asset allocation and investment policy decisions based on these and other factors. We will discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

#### **Investment Strategies**

We recognize that each client's needs and goals are different; subsequently portfolio strategies and underlying investment vehicles may vary. The firm will generally pursue a long term, disciplined buy-and-hold investment strategy that emphasizes passive versus active investments; seeks broad diversification, minimizes costs and pursues regular rebalancing based upon the client's optimal asset allocation.

# **Investment Strategy and Method of Analysis Material Risks**

#### **Investment Strategy Risks**

We believe our strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, we cannot guarantee that an investment objective or planning goal will be achieved. As an investor, you must be able to bear the risk of loss that is associated with your account, which may include the loss of some or all of your principal. In general, risks regarding markets include interest rates, company, and management risk, among others.

Examples include:

<u>Company Risk</u> – When investing in securities, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry.

<u>Financial Risk</u> – Excessive borrowing to finance business operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

<u>Fundamental Analysis</u> – The risk involved in employing fundamental analysis is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

<u>Management Risk</u> – An investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.

<u>Market Risk</u> – When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called systemic or systematic risk.

<u>Passive Market Strategies</u> – When a portfolio employs a passive, efficient markets approach, an investor will need to consider the potential risk that the broader allocation may at times generate lower-than-expected

returns than that from a specific asset, and that the return on each type of asset is a deviation from the average return for the asset class. It is felt that this variance from the "expected return" is generally low under normal market conditions if the portfolio is made up of diverse, low or non-correlated assets.

<u>Research Data</u> – When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while our firm makes every effort to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice on or investment management of an account.

<u>Socially Conscious Investing</u> – If you require your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

#### **Security-Specific Material Risks**

<u>ETF/ETN and Mutual Fund Risk</u> – ETFs/ETNs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees. The risk of owning these types of holdings also reflects the risks of their underlying securities.

<u>Fixed Income Risks</u> – Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including:

Credit Risk - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

Duration Risk - Duration is a measure of a bond's volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.

*Interest Rate Risk* - The risk that the value of the fixed income holding will decrease because of an increase in interest rates.

Liquidity Risk - The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading on any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

*Reinvestment Risk* – With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

<u>Index Investing</u> – ETFs and indexed funds have the potential to be affected by "active risk" or "tracking error risk;" which might be defined as a deviation from a stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a "sample" or "optimized" index ETF that may not as closely align the stated benchmark. In these instances, the firm may recommend to reduce the weighting of a satellite holding; utilize very active satellites, or use a "replicate index" ETF as part of a core holding to minimize the effects of the tracking error in relation to the overall portfolio.

<u>Inflation Risk</u> – When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

<u>QDI Ratios</u> – While many ETFs, ETNs, and index mutual funds are known for their potential tax-efficiency and higher "qualified dividend income" (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF/ETN or mutual fund portfolio), may be considered "non-qualified" under certain tax code provisions. We consider a holding's QDI when tax-efficiency is an important aspect of the client's portfolio.

<u>REITs</u> – Risks involved real estate investment trusts (REITs) investing may include:

- following the sale or distribution of assets an investor may receive less than their principal invested
- a lack of a public market in certain issues
- limited liquidity and transferability
- a fluctuation of value of the assets within the REIT
- reliance on the investment manager to select and manage assets
- changes in interest rates, laws, operating expenses, and insurance costs
- tenant turnover
- current market conditions

# **Item 9 - Disciplinary Information**

Neither the firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our offering advisory business or its integrity.

#### **Item 10 - Other Financial Industry Activities and Affiliations**

Firm policies require associated persons to conduct business activities in a manner that avoids conflicts of interest between the firm and its clients, or that may be contrary to law. Hawkins Capital Advisors will provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise its impartiality or independence.

Neither the firm, management, nor its associates, are registered or have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) introducing broker/dealer, or as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

# Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Neither Hawkins Capital Advisors nor its management is or has a material relationship with any of the following types of entities:

- · municipal securities dealer, or government securities dealer or broker
- · banking or thrift institution
- accountant or accounting firm
- lawyer or law firm
- pension consultant
- sponsor or syndicator of limited partnerships
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)

Upon your request, we may provide referrals to various professionals, such as an attorney or accountant. We do not have an agreement with or receive fees from these professionals for these informal referrals. Any fees charged by these other entities for their services are completely separate from fees charged by our firm.

Mr. Hawkins (firm principal) is a California-licensed insurance agent. Further information about his business activities may be found in Item 19 of this brochure.

# **Recommendation or Selection of Other Investment Advisors and Conflicts of Interest**

While it is not our practice to do so, should we ever provide you with a recommendation to an unaffiliated registered investment advisor to manage your portfolio we will first ensure we have conducted what we believe is an appropriate level of due diligence on the recommended third party advisor, to include ensuring their firm is appropriately registered or notice-filed within your jurisdiction. Please note that we are not paid for this referral nor do we share in any fees these firms may receive in managing your account.

#### Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

# **Code of Ethics Description**

We have adopted a Code of Ethics that establishes policies for ethical conduct for all our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Our policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others.

Mr. Hawkins is a Certified Financial Planner™ Professional and adheres to the Certified Financial Planner Board of Standards, Inc. principles, which state:

# Principle 1 – Integrity

An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisors are placed by clients in positions of trust by clients, and the ultimate source of that trust is the advisor's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion; but integrity cannot co-exist with deceit or subordination of one's principles.

# Principle 2 - Objectivity

An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

# *Principle 3 – Competence*

Advisors will maintain the necessary knowledge and skill to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors make a continuing commitment to learning and professional improvement.

#### Principle 4 - Fairness

Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

# Principle 5 – Confidentiality

Advisors will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

# Principle 6 – Professionalism

Advisors will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in

related professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

# Principle 7 – Diligence

Advisors will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

The firm periodically reviews and amends its Code of Ethics to ensure that it remains current, and requires all access persons to attest to their understanding of and adherence to the Code of Ethics at least annually.

A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

# **Privacy Policy Statement**

Hawkins Capital Advisors respects the privacy of all clients and prospective clients ("customers"), both past and present. It is recognized that you have entrusted the firm with non-public personal information and it is important that all firm access persons and customers are aware of firm policy concerning what may be done with that information.

The firm collects personal information about customers from the following sources:

- Information clients provide to complete their financial plan or investment recommendation;
- Information clients provide in engagement agreements, account applications, and other documents completed in connection with the opening and maintenance of their accounts;
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about client transactions.

The firm does not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our clients have requested;
- When our customers have specifically authorized us to do so;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

Within the firm, access is restricted to customer information to staff that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed to not discuss customer information with someone else that may request information about an account unless they are specifically authorized in writing by the customer to do so. This includes, for example, providing information about a spouse's IRA account or to adult children about parents' accounts, etc.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information.

The firm will provide you with its privacy policy on an annual basis per federal law and at any time, in advance, if firm privacy policies are expected to change.

#### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm nor its associates are authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a "related person" (e.g., associates, their immediate family members, etc.) has a material financial interest, such as in the capacity as an underwriter or advisor to an issuer of securities, etc.

Our associates are prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

The firm recognizes that should it act as the advisor to the sponsor of an ERISA-qualified retirement plan (i.e., 401(k) or pension plan) and one of its investment advisor representatives serves in an advisory capacity to one or more of the plan's participants, a potential or implied conflict of interest may occur. The firm may require its employee to cease in this plan participant advisory capacity or, upon disclosure to and approval from the plan sponsor, allow the dual advisory role to continue and with consideration made to offset participant fees.

Investment advisor representatives may also serve as licensed insurance agents, and certain clients may have both an investment advisory and insurance relationship. In instances where an insurance product is purchased subsequent a financial plan the firm has been engaged by the client to develop, and the purchase is made through an associated representative (as agent) that results in a commission being paid to the agent by the issuer, the firm may (but is not obligated to) offset its financial planning fee at the discretion of a firm principal or as required by jurisdictional statute.

Hawkins Capital Advisors firm is able to provide a broad range of services to its clients, including financial planning, investment consultation, and investment supervisory services; we may be paid a fee for some or all of these services, as well as a commission for insurance coverage we may have assisted a client in acquiring. Due to our firm and its associate's ability to offer two or more of these services and possibly be compensated for each aspect of the engagement, a potential conflict of interest may exist. Therefore, we note that you are under no obligation to act on our recommendations and, if you elect to do so, you are under no obligation to complete all of them through our firm or a service provider whom we may recommend.

# **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm does not trade for its own account (e.g., proprietary trading). The firm's related persons may buy or sell securities the same as, similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over a client.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of a client's order, etc.), our policy requires that we restrict or prohibit related parties' transactions in specific securities. Any exceptions or trading pre-clearance must be approved by our firm in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

# <u>Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest</u>

Please see our response in the previous section termed "Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest."

#### **Item 12 - Brokerage Practices**

# **Factors Used to Select Broker-Dealers for Client Transactions**

Hawkins Capital Advisors does not maintain physical custody of your assets (see Item 15). Your account must be maintained by a qualified custodian (generally a broker/dealer, bank or trust company) that is frequently assessed for its capabilities to serve in that capacity by their respective industry regulatory authority. Our firm is not a custodian nor do we have an affiliate that is a custodian.

When engaged to provide investment consultation services, we may recommend the service provider with whom your assets are currently maintained. Should you prefer a new service provider, our recommendation of another service provider would be based on your needs, overall cost, and ease of use.

If you have engaged our firm to provide investment supervisory services, we generally recommend our clients use the institutional services divisions of Interactive Brokers LLC, Inc. ("IB, IBKR") or Trade-PMR, Inc. ("Trade-PMR"), FINRA and SIPC members,<sup>4</sup> and independent SEC-registered broker/dealers. As stated earlier, our firm is independently owned and operated, and is not legally affiliated with Interactive Brokers LLC, Trade-PMR or any other firm we may recommend.

While we recommend that you use Interactive Brokers LLC or Trade-PMR as your service provider, you will decide whether to do so and will open your account with them by entering into an account agreement directly with them. We do not technically open the account for you, although we will assist you in doing so. If you do not wish to place your assets with Interactive Brokers LLC or Trade-PMR, then we potentially may not be able to manage your account under our investment supervisory services engagement.

Interactive Brokers LLC and Trade-PMR offer independent investment advisors various services which include custody of securities, trade execution, clearance and settlement of transactions. Our firm may receive certain benefits from Interactive Brokers LLC and/or Trade-PMR through participation in their programs (please see Item 14).

We periodically conduct an assessment of any service provider we recommend (including Interactive Brokers LLC and Trade-PMR) which generally involves a review of their range of services, reasonableness of fees, among other items, and in comparison to their industry peers.

#### **Best Execution**

"Best execution" means the most favorable terms for a transaction based on all relevant factors, including those listed in the earlier paragraph. We recognize our obligation in seeking best execution for our clients, however, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected service provider's transactions represent the best "qualitative execution" while taking into consideration the full range of services provided. Therefore, we will seek services involving competitive rates but it may not necessarily correlate into the lowest possible rate for each transaction.

We have determined that having our firm's trades executed through Interactive Brokers LLC and Trade-PMR is consistent with our duty to seek best execution of your trades. We also periodically review policies regarding our recommending service providers to our clients in light of our duty to seek best execution.

# **Directed Brokerage**

We do not require or engage in directed brokerage involving our accounts.

<sup>&</sup>lt;sup>4</sup> Our firm is not, nor required to be, a FINRA or Securities Investor Protection Corporation (SIPC) member. You may learn more about SIPC and how it serves member firms and the investing public by going to their website at http://www.sipc.org.

As our client, you may direct our firm (in writing) to use another particular broker/dealer to execute some or all transactions for your account. In these circumstances, you will be responsible for negotiating, in advance, the terms and/or arrangements for your account with your selected broker/dealer. We will be limited in our ability to execute trades on your behalf and you me be required to do these on your own.

We will not be obligated to seek better execution services or prices from these other broker/dealers, or be able to aggregate your transactions, should we choose to do so, for execution through other custodians with orders for other accounts managed by our firm. As a result, you may pay higher commissions or other transaction costs, experience greater spreads, or receive less favorable net prices, on transactions for your account than would otherwise be the case. Further, pursuant to our obligation of best execution, we may decline a request to direct brokerage if we believe any directed brokerage arrangement would result in additional operational difficulties or risk to our firm.

#### **Aggregating Securities Transactions**

Whenever practical, transactions for our clients will generally be completed at the same time, often termed "aggregated" or "batched" orders. We may (but are not obligated to) aggregate orders in an attempt to obtain better execution, negotiate favorable transaction rates, or to allocate equitably among our client accounts should there be differences in prices and other transaction costs that might have been obtained had such orders been separately placed. We do not receive any additional compensation or remuneration as a result of aggregated transactions.

Commission prices may vary due to account size and/or confirmation receipt method. To the extent that the firm determines to aggregate client orders for the purchase or sale of securities, including securities in which the firm or related party may invest, the firm will generally do so in accordance with the parameters set forth in SEC No-Action Letter, *SMC Capital, Inc.* 

Client accounts where trade aggregation is not allowed or infeasible may potentially be assessed higher transaction costs than those that are batched.

We review both our trade aggregation procedures and allocation processes on a periodic basis to ensure they remain within stated policies and regulation. We will inform you, in advance, should our trade aggregation and allocation practices change at any point in the future.

#### **Trade Errors**

The firm corrects its trade errors through an account maintained by the firm's custodian and the firm may be responsible for trading losses in accounts. Likewise, the firm may also receive any gains resulting from the correction of any trade errors and, therefore, may potentially receive a benefit from this arrangement.

# **Item 13 - Review of Accounts**

#### Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Financial Planning and Investment Consultation Services

You should contact our firm for additional reviews when making decisions about changes in your financial situation (i.e., the loss of a job, retirement, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances).

Periodic financial check-ups or reviews are recommended if you are receiving our financial planning and investment consultation services, and we recommend that they occur at least on an annual basis whenever practical.

Reviews will be conducted by your financial planner and normally involve analysis and possible revision of your previous financial plan or investment allocation.

Unless provided for in your engagement agreement, reviews are generally conducted under a new or amended agreement and will be assessed at our current fee rate.

#### **Investment Supervisory Services**

Investment supervisory services accounts are reviewed on a periodic basis, typically quarterly or more frequent when necessary. These reviews are completed by your investment advisor representative and firm supervisory personnel (i.e., our designated principal). We may also engage qualified independent consultants to conduct periodic assessments.

#### **Review of Client Accounts on Non-Periodic Basis**

#### **Financial Planning and Investment Consultation Services**

You are free to contact our firm for additional reviews when there are material changes that occur in your financial situation (i.e., loss of a job, early retirement, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances), or should you prefer to change requirements involving your account. Non-periodic reviews are generally conducted by your financial planner and under a new or amended agreement and will be assessed at our published rate.

# **Investment Supervisory Services**

Additional reviews by your investment advisor representative and/or supervisory personnel may be triggered by news or research related to a specific holding, a change in our view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector.

Accounts may be reviewed for an additional holding or when an increase in a current position is under consideration. Account cash levels above or below what we deem appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, may also trigger a review.

#### **Content of Client Provided Reports and Frequency**

If you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. We urge you to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear.

We may provide portfolio reports if we are engaged to provide periodic asset allocation or investment advice; however, we do not provide ongoing performance reporting under our financial planning and investment consultation services engagements.

For our investment supervisory services accounts, our firm may provide quarterly reports or position performance summary reports, and annual realized gains/loss reports for taxable accounts. Some of our clients may receive additional reports depending on their specific requirements.

All firm performance reports (if any are provided) will be in prepared in accordance with appropriate jurisdictional guidance. Clients are urged to carefully review and compare account statements that they have received directly from their service provider with any report received from our firm.

# **Item 14 - Client Referrals and Other Compensation**

# **Economic Benefit from External Sources and Potential Conflicts of Interest**

We may receive an economic benefit from external sources in the form of the support products and services they make available to us and other independent investment advisors. As disclosed under Item 12, our firm participates in Interactive Brokers LLC and Trade-PMR's institutional customer program and we may recommend Interactive Brokers LLC or Trade-PMR to our clients for custody and brokerage services.

There is no direct link between our participation in the program and the investment advice we give our clients, although our firm receives economic benefits through its participation in the program that are typically not available to "retail investors." These benefits include the following products and services (provided either without cost or at a discount):

- receipt of duplicate client statements and confirmations
- research related products and tools
- · consulting services
- access to a trading desk serving our clients
- access to block trading (which provides our ability to aggregate securities transactions for execution and then allocate the appropriate shares to our client's accounts)
- the ability to have advisory fees deducted directly from our client's accounts per our written agreement
- · access to an electronic communications network for client order entry and account information
- access to mutual funds with no "loads" or transaction fees, and to certain institutional money managers
- discounts on compliance, marketing, research, technology, and practice management products or services provided to our firm by third party vendors

Interactive Brokers LLC and/or Trade-PMR may also pay for business consulting and professional services received by our firm. Some of the products and services made available by Interactive Brokers LLC and/or Trade-PMR may benefit our firm but may not benefit client accounts. These products or services may assist us in managing and administering our client accounts, including accounts not maintained at Interactive Brokers LLC or Trade-PMR. These other services made available by Interactive Brokers LLC or Trade-PMR are intended to help our firm manage and further develop our business enterprise. The benefits received by our firm or its associates through participation in a program do not depend on the amount of brokerage transactions directed to Interactive Brokers LLC or Trade-PMR.

As part of our fiduciary duty, Hawkins Capital Advisors will endeavor at all times to put the interests of our clients first. Our clients should be aware, however, that the receipt of any economic benefit by our firm or its associates in and of itself creates a potential conflict of interest and may influence our choice of Interactive Brokers LLC or Trade-PMR for custody and brokerage services.

# **Advisory Firm Payments for Client Referrals**

If a client is introduced to our firm by an unaffiliated solicitor, the firm may pay that solicitor a referral fee in accordance with California statute. Any such referral fee shall be paid solely from the firm's investment management fee and shall not result in any additional charge to the client. The unaffiliated solicitor will provide the client with the firm's ADV Part 2 in addition to the solicitor's disclosure statement that contains the terms and conditions of the solicitation arrangement, including its compensation arrangement.

Investment advisor representatives of our firm may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. The public may also choose to telephone association staff to inquire about an individual within their area, and would receive the same or similar information. A portion of these participant's membership fees may be used so that their name will be listed in some or all of these entities' websites (or other listings). Prospective clients locating our firm or one of our associates via these methods are not actively marketed by the noted associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

# Item 15 - Custody

Your funds and securities will be maintained by an unaffiliated, qualified custodian, such as a bank, broker/dealer, mutual fund companies, or transfer agent. Your assets are not held by our firm or any of our associates. In keeping with our policy of not having custody of our client funds or securities, we:

- Restrict our firm and associates from serving as trustee or having general power of attorney over a client account.
- Are prohibited from having authority to withdraw securities or cash assets from a client account. Advisory fees will only be withdrawn from a client investment account through a qualified custodian maintaining your account assets, per your written approval (termed "constructive custody").
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm.
- Will not collect advance fees of \$500 or more for services that are to be performed six months or more into the future.
- Will not authorize any associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) when such access might result in physical control over client assets.

You will be provided with transaction confirmations and summary account statements provided directly to you by your selected service provider. Typically, these statements are provided on at least a quarterly basis or as transactions occur. We will not create a statement for you nor be the sole recipient of account statements.

Should you receive periodic reports from our firm that includes investment performance information, you are urged to carefully review and compare your account statements that you have received directly from your service provider with any report from our firm.

# **Item 16 - Investment Discretion**

We provide our various forms of investment advisory services (as described in Item 4) under either *discretionary* or *non-discretionary* account authority, and as determined by your written engagement agreement. We generally provide our investment supervisory services under a *discretionary* agreement.

Similar to a limited power of attorney, discretionary authority allows our firm to implement investment decisions, such as the purchase or sale of a security on behalf of your account, without requiring your prior authorization for each transaction in order to meet your stated account objectives. This authority will be granted through your execution of both our engagement agreement and the selected custodian's account opening documents. Further, your custodian will specifically limit our firm's authority in the account to the placement of trade orders and the deduction of advisory fees.

Should you prefer your account to be managed in a *non-discretionary* manner, your prior approval must be made for each transaction with regard to the investment and reinvestment of account assets or for the firm to give instructions to the service provider maintaining your account. In light of the requirement for your pre-approval, you must make yourself available and keep us updated on your contact information so that instructions can be efficiently effected on your behalf.

Our firm will retain information about all client account directions, limitations and rescissions that are reviewed and approved by a supervisory principal with our firm.

# **Item 17 - Voting Client Securities**

#### **Proxy Voting**

Our firm does not vote proxies on your behalf nor do we offer guidance on how to vote proxies. You will maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that are beneficially owned by you shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to your holdings.

#### **Other Corporate Actions**

We do not offer guidance on or have the power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

# **Receipt of Materials**

You may receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should we receive a duplicate copy, note that we do not generally forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

#### **Item 18 - Financial Information**

#### **Balance Sheet**

Our firm will not take physical custody of your assets. Fee withdrawals must be done through a qualified intermediary (e.g., custodian of record), per your prior written agreement, and following your receipt of our written notice.

Our engagements do not require that we will collect fees from you of \$500 or more for our advisory services we will perform six months or more in advance.

Neither the firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

Due to the nature of our firm's services and operational practices, an audited balance sheet is not required per statute nor included with this brochure.

#### Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

The firm and its management do not have a financial condition likely to impair our ability to meet our commitment to our clients.

# **Bankruptcy Petitions during the Past 10 Years**

The firm and its management have not been the subject of a bankruptcy petition at any time during the past 10 years.

#### **Item 19 - Requirements for State-Registered Advisers**

# **Principal Executive Officers and Management Persons**

Proprietor/Designated Principal (Supervisor)/ Investment Advisor Representative

Craig Alvin Hawkins (Born 1966)

**Educational Background and Business Experience** 

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm through the ADV Part 2A and/or ADV Part 2B (Brochure Supplement), as well as their business experience for at least the past five years.

#### **Educational Background**

Bachelor of Arts in Fine Arts, University of California, Santa Barbara; Santa Barbara, CA CERTIFIED FINANCIAL PLANNER™ Professional, CFP®4, Certified Financial Planner Board of Standards, Inc. Life Insurance Agent License⁵ (#0B02900), California Department of Insurance

#### **Business Experience**

Hawkins Capital Advisors (2012-Present) Los Angeles, CA Owner/Investment Advisor Representative

Apple, Inc. (2013-Present) Century City, CA Client Manager/Business Specialist

Gradient Securities, LLC (2012-2013)

Los Angeles, CA Registered Representative

Self-Employed (2011-2012) Los Angeles, CA Insurance Agent/Investment Advisor Representative

Farmers Insurance/Farmers Financial Solutions (2009-2010) Culver City, CA Insurance Agent/Financial Advisor

Wells Fargo Private Client Services (2008-2009) Los Angeles, CA Financial Advisor

InvestnRetire (2006-2007) Los Angeles, CA Business Development Officer

City National Bank (2000-2007) Los Angeles, CA Business Development

#### **Other Business Activities**

Mr. Hawkins provides tax preparation services independently of the firm. This activity accounts for approximately 10% of his time per month.

Mr. Hawkins is employed as a client manager/business specialist with Apple, Inc. This activity involves approximately 30% of his time each month, and is not investment related.

Mr. Hawkins is a licensed insurance agent and he is able to sell annuities, life, health, long term care and property and casualty insurance to interested parties through various unaffiliated insurance companies where he may receive a commission on a client's purchase of the insurance contract. This activity involves 10% of his time during business hours each month. Mr. Hawkins may therefore perform in a role as licensed insurance agent and/or investment advisor representative and will disclose in advance of a transaction or agreement the capacity in which he is serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur.

Mr. Hawkins is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. Therefore, he does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products, including that as a registered representative of a broker/dealer, and including distribution or service ("trail") fees from the sale of mutual funds.

#### **Additional Compensation**

Mr. Hawkins is not compensated for advisory services involving performance-based fees. Further, our firm also prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

# **Material Relationships with Issuers of Securities**

Neither Mr. Hawkins nor his firm has a material relationship with the issuer of a security.

# **Disciplinary Information**

Registered investment advisors are required to disclose certain material facts regarding any legal or disciplinary events that would be material to your evaluation of each officer or a supervised person providing investment advice. No reportable information is applicable to this section under published guidelines.

# **Supervision**

Mr. Hawkins serves in multiple capacities for Hawkins Capital Advisors: proprietor, firm principal (supervisor), financial planner and investment advisor representative. We recognize the inability to segregate certain duties may potentially create conflicts of interest; policies and procedures are employed to ensure appropriate recordkeeping and supervision. Questions relative to the firm, its services or this ADV Part 2A may be made to the attention of Mr. Hawkins at (323) 389-7171.

Additional information about the firm, other advisory firms, or an associated investment advisor representative, including Mr. Hawkins, is available on the Internet at www.adviserinfo.sec.gov. A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as an IARD number. The IARD number for Hawkins Capital Advisors is 164534. You may also search Mr. Hawkins by name or his reference number, which is 1870550.

The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by contacting the California Securities Department at (800) 628-7937.

#### **Requirements for State-Registered Advisers**

There have been neither awards nor sanctions or other matter where Mr. Hawkins or the firm has been found liable in a self-regulatory or administrative proceeding. Further, neither Mr. Hawkins nor the firm has been the subject of a bankruptcy petition.

#### **Business Continuity Plan**

Our firm maintains a business continuity plan that is integrated with the entirety of our organization to ensure we appropriately respond to events that pose a significant disruption to its operations. A statement concerning our current plan is available under separate cover.

<sup>4</sup> The **CERTIFIED FINANCIAL PLANNER™**, **CFP®** and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university).
   CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances:
- Experience Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education Complete 30 hours of continuing education hours every two years, including two hours on the Code of
   Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the
   financial planning field; and
- Ethics Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that
   CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must pro vide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

<sup>5</sup> **State insurance examinations** are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of an insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a state insurance commissioner.