Item 1: Cover Page

The Horst Group, LLC

700 N Colorado Blvd #161
Denver CO 80206

Form ADV Part 2A – Firm Brochure

(415) 318-7969

Dated: March 2024

www.horstfp.com

This Brochure provides information about the qualifications and business practices of The Horst Group, LLC. If you have any questions about the contents of this Brochure, please contact us at (415) 318-7969 and/or jonathan@horstfp.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

The Horst Group, LLC is a registered investment advisor. Registration does not imply a certain level of skill or training.

Additional information about The Horst Group, LLC also is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 321135.

Item 2: Material Changes

Since the first published version of this Brochure, dated March 2023, the following are material changes:

- Our principal business address has changed – see Cover Page
- Item 4: Advisory Business has been amended to report current assets under management.

Item 3: Table of Contents

Item 4: Advisory Business

Description of Advisory Firm

The Horst Group, LLC is an Investment Advisor principally located in the state of Colorado. We are a limited liability company founded in February of 2022. The Horst Group, LLC became registered in January of 2023. Jonathan Horst is the principal owner and Chief Compliance Officer ("CCO").

As used in this brochure, the words "THG", "we", "our firm", "Advisor" and "us" refer to The Horst Group, LLC and the words "you", "your" and "Client" refer to you as either a client or prospective client of our firm.

Types of Advisory Services

THG is a fee-only firm, meaning the only compensation we receive is from our Clients for our services. We offer discretionary investment management and financial planning services. From time to time, THG recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients always have the right to decide whether to utilize any third-party professional we recommend. THG is not affiliated with nor does THG receive any compensation from third-party professionals we may recommend.

Financial Planning Services

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written report, providing the Client with a detailed financial plan designed to help achieve his or her stated financial goals and objectives.

In general, the financial plan will address some or all of the following areas of concern. The Client and THG will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.

- **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, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **College Savings**: Includes projecting the amount that will be needed to achieve college or other 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, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).

- **Employee Benefits Optimization**: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of 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.

- **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.

- **Financial Goals**: We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

- **Insurance**: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.

- **Investment Analysis**: This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

- **Retirement Planning**: Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., 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.

- **Risk Management:** A risk management review includes 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 planning. Advice may be 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 cost of not purchasing insurance ("self-insuring").

- **Tax Planning Strategies:** Advice may include 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 the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Ongoing financial planning involves working one-on-one with a financial planner ("the Advisor") over an extended period of time. Clients are expected to collaborate with the Advisor to develop and assist in the implementation of their financial plan (the "plan") over a series of initial in depth meetings, which will be used to explore and define a Client's life vision and major obstacles that will need to be addressed during the planning process. the Advisor will monitor the plan, recommend any appropriate changes and ensure the plan is up-to-date as the Client's situation, goals, and objectives evolve.

THG will obtain and analyze all necessary qualitative and quantitative information from the Client that is essential to understanding the Client's personal and financial circumstances; helping the Client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client's current course of action and alternative courses of action to identify required changes that provide the best opportunity for the client to meet their financial goals; developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and ongoing monitoring of the Client's progress toward the goals and objectives that the recommendations are based around. These components all require in-depth communication with the Client in order for the Advisor to establish a financial plan and implementation strategy that provides the Client with the most appropriate options in pursuing their established goals and objectives.

Clients will participate in up to three regular check in meetings per year and unlimited email and phone/video conference support throughout the year (between regular check in meetings).

Financial Check Up Service

Our financial check up service is a limited financial planning engagement with no follow up services. This service consists of a two hour review of up to two specific areas of financial planning, with a plan deliverable within six (6) months of the engagement. Clients may select from any of the areas of financial planning listed above or of the client's choice.

Discretionary Investment Management Services

For clients seeking only investment advice and management, our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy statement with an asset allocation target and create and manage a portfolio based on that policy and allocation targets, which will be revisited on an annual basis. We will also review and discuss a Client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as risk tolerance and tax considerations.

We primarily advise our Clients regarding investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in Client's portfolio at the inception of our advisory relationship and/or other investment types not listed above, at the Client's request.

When we provide discretionary investment management services, Clients are required to grant us limited authority to buy and sell securities on a discretionary basis. More information on our trading authority is explained in Item 16 of this Brochure. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

When appropriate, we utilize the services of third-party investment advisors ("Outside Managers") to assist with the management of Client accounts. We assist Clients in selecting an appropriate allocation model, completing the Outside Manager's investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of Outside Managers is further discussed in Item 8 of this Brochure. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

The specific Outside Managers that we use, Dimensional Fund Advisors, L.P. ("DFA") and Ethic, Inc. ("Ethic"), operate as sub-advisors who work through THG to help them with portfolio management. They do not work with the end client directly. DFA and/or Ethic will execute a sub-advisory agreement with THG that enables them to operate off of the advisor's (THG's) instructions, which also requires the primary advisor to have discretionary trading authority. THG retains the right to use DFA and/or Ethic when they believe it is in the client's best interest and maintains the flexibility to use other sub-advisors or manage the assets directly if/when appropriate. Clients of THG will sign a billing authorization form that allows the sub-advisor (DFA and/or Ethic) to instruct the custodian to debit the total advisory fee for their platform and for THG, and will remit THG's advisory fees to them from the custodian.

Financial Life Management Service

This service is designed to combine both financial planning and optional discretionary investment management as they are described above. The service involves working one-on-one with a financial planner ("planner") over an extended period of time. Through this ongoing arrangement, Clients are expected to collaborate with the Advisor to develop and assist in the implementation of their financial plan (the "plan") over a series of initial in depth meetings. These meetings will be used to explore and define a Client's life vision and major obstacles that will need to be addressed during the planning process. the Advisor will monitor the plan, recommend any appropriate changes and ensure the plan is up-to-date as the Client's situation, goals, and objectives evolve.

Upon engaging the firm for financial planning, THG is responsible for obtaining and analyzing all necessary qualitative and quantitative information from the Client that is essential to understanding the Client's personal and financial circumstances; helping the Client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client's current course of action and alternative courses of action to identify required changes that provide the best opportunity for the client to meet their financial goals; developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and ongoing monitoring of the Client's progress toward the goals and objectives that the recommendations are based around. These components all require in-depth communication with the Client in order for the Advisor to establish a financial plan and implementation strategy that provides the Client with the most appropriate options in pursuing their established goals and objectives.

Clients engaging in financial life management service will participate in up to three regular check in meetings per year and unlimited email and phone/video conference support throughout the year between regular check in meetings.

Retirement Plan Consulting

Our firm provides retirement plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors or plan named fiduciaries in establishing, monitoring, and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure, and participant education.

In providing retirement plan services, our firm does not provide any advisory or management services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly-traded REITs), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets").

Certain plans and/or clients that we may provide services to are regulated under the Employee Retirement Income Securities Act of 1974 ("ERISA"). We will provide employee benefit plan services to the plan sponsor and/or fiduciaries as described above for the fees set forth in Item 5 of this brochure. The services we provide are advisory in nature. We are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting as a fiduciary of the plan as defined in Section 3(21)(A)(ii) under ERISA.

Educational Seminars/Speaking Engagements

We may provide seminars for groups seeking general advice on investments and other areas of personal finance. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual's need, nor does THG provide individualized investment advice to attendees during these seminars. Topics covered during educational seminars will be determined by the Client and THG.

CCR Section 260.235.2 Disclosure

For Clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our Client. The Client is under no obligation to act upon our recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through our firm.

Client Tailored Services and Client Imposed Restrictions

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be traded in their account or advised on or recommended. All such requests must be provided to THG in writing. THG will notify Clients if they are unable to accommodate any requests.

Wrap Fee Program
We do not participate in wrap fee programs.

Assets Under Management

As of 12/31/2023, the Firm has $19,235,143 in discretionary assets under management and will not be managing non-discretionary accounts.

Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without fee or penalty.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. No increase to fees to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior written Client consent. Please note, lower fees for comparable services may be available from other sources. At no time do we require prepayment of $500 or more six months or more in advance of rendering the services.

Financial Planning Services

Financial Check Up

The Financial Checkup service is a fixed fee in the amount of $2,500, paid in advance. No follow up services are provided with the Financial Check Up. The fee may be paid either by check or through an unaffiliated payment processing service. After the Financial Check Up service is completed, if the Client decides to engage THG under the Financial Life Management service, then the Financial Check Up fee will be applied to the Financial Life Management service fee. This service may be terminated with written notice at least 30 days in advance. Any unearned fee will be refunded to client and any partial work delivered to client.

Discretionary Investment Management Services

The fee is based on a percentage of assets under management (AUM) and may be negotiable in certain cases. The annualized fees for discretionary investment management services are based on the following fee schedule:

Account Value	Annual Advisory Fee
$0 - $2,000,000	1.00%
$2,000,001 - $5,000,000	0.85%
$5,000,001 - $10,000,000	0.65%
$10,000,001 and Above	0.50%

The annual advisory fee is paid quarterly, in advance, based on the value of the account on the last business day of the prior quarter. The advisory fee is a blended fee schedule and may be negotiable. No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement.

In determining the advisory fee, we will allow accounts of members of the same household to be aggregated, unless the Client instructs THG otherwise. THG relies on the valuation as provided by Client's custodian in determining assets under management. Our discretionary investment management fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

For Discretionary Investment Management services, we deduct our advisory fee from one or more account(s) held at an unaffiliated third-party custodian, as directed by the Client. We require the direct deduction of fees from Client account(s).We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

The Advisory Contract may be terminated with written notice at least 30 calendar days in advance. Upon termination of the Advisory Contract, a prorated refund will be provided to the Client. Any unearned fee will be refunded to client and any partial work delivered to client.

If THG utilizes an Outside Manager, the above fee schedule does not include the Outside Manager's fee. The Outside Manager's advisory fees, billing schedule, and payment procedures are set forth in their separate written disclosure documents, advisory agreements, and/or the account opening documents of your account Custodian. At no point will the combined fee charged to the Client exceed 2% of assets under management. Clients of THG will sign a billing authorization form that allows the sub-advisor (DFA and/or Ethic) to instruct the custodian to debit the total advisory fee for their platform and for THG, and will remit THG's advisory fees to them from the custodian.

Financial Life Management

Financial Life Management includes Financial Planning and gives clients the choice to include Discretionary Investment Management. Fees for Financial Life Management consist of an initial fee up to $2,500, depending on complexity of the client, and an ongoing fee based on total Assets Under Advisement (AUA) and Assets Under Management (AUM) described below. The fee is paid quarterly in advance. Clients who choose to also engage THG for Discretionary Investment Management as described in Item 4, may have their AUM fees applied towards their Financial Life Management fee. The amount of the Financial Life Management fee will be reviewed and adjusted at least every 2 years. The fee may be negotiable in certain cases. The fee may be paid either by check, through an unaffiliated payment processing service, or debited from client accounts under management. This service may be terminated with written notice of at least 30 days. Upon termination, the fee will be prorated and any unearned fee will be refunded to the client.

The annual fee is based on the following AUA fee schedule. Assets under Advisement (AUA) consists of all of the client's assets on which THG will advise and make recommendations to client through Financial Planning as described in Item 4. Client's primary residence and illiquid investments are excluded from AUA. The AUA fee schedule is tiered and the annual fee is determined by total AUA. For example a client with total AUA of $4,500,000 - in the tier of total AUA of $4,000,001 - $5,000,000 - would have a corresponding annual fee of $19,000.

Total Assets Under Advisement (AUA)	Annual Fee
$0 - $500,000	$6,000
$500,001 - $1,000,000	$8,000
$1,000,001 - $2,000,000	$10,000
$2,000,001 - $3,000,000	$13,000
$3,000,001 - $4,000,000	$16,000
$4,000,001 - $5,000,000	$19,000
$5,000,001 - $6,000,000	$23,000
$6,000,001 - $8,000,000	$28,000
$8,000,001 - $10,000,000	$33,000
$10,000,001 - $12,500,000	$38,000
$12,500,000 - $15,000,000	$44,000
$15,000,001 and Above	Negotiable

For clients who also choose to have THG manage specific investment accounts, the following AUM fee schedule applies. Note, that in certain cases the AUM fee may exceed the AUA fee calculation and is reflective of the combined services of both financial planning and discretionary investment management provided to the client. In those cases the AUM fee calculation will supersede the AUA fee calculation in consideration of the additional services to clients described in Item 4 under Discretionary Investment Management.

Account Value	Annual Advisory Fee
$0 - $2,000,000	1.00%
$2,000,001 - $5,000,000	0.85%
$5,000,001 - $10,000,000	0.65%
$10,000,001 and Above	0.50%

The AUM fee schedule is blended and is calculated by assessing the percentage rates using the predefined levels of as assets shown in the chart, resulting in a combined weighted fee. For example a client with an account valued at $3,000,000 would pay an effective fee of 0.95% with the annual fee of $28,500. The quarterly fee is determined by the following calculation: (($2,000,000 x 1.00%) + ($1,000,000 x 0.85%) ÷ 4 = $7,125.

In the case of AUM, fees are directly debited from client accounts. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice of 30 days. Upon termination of the account, any unearned fee will be refunded to the client.

Three scenarios for a Financial Life Management Client:

Example 1, a client who wants financial planning only and pays a fee calculated based on total assets under advisement. Client has total AUA of $2,100,000 and would have an annual AUA fee of $13,000, or $3,250 per quarter.

Example 2, a client who wants financial planning and discretionary investment management. Client has total AUA of $2,100,000 and an investment portfolio that they want THG to manage with a value of $500,000. The client's annual AUA fee would be $13,000 and the annual AUM fee would be $5,000. The client's quarterly fee of $3,250 would be paid in part by a direct debit from the managed account of $1,250 with a remainder of 2,000 paid directly.

Example 3, a client who wants financial planning and discretionary investment management whose AUM fee exceeds the AUA fee. Client has a total AUA of $2,100,000 and an investment portfolio that they want THG to manage with a value of $1,600,000. The client's annual AUA fee would be $13,000 and the annual AUM fee would be $16,000. Since the AUM fee is greater, the client's quarterly fee would be $4,000 paid by a direct debit from the managed account.

Retirement Plan Consulting

The fee is based on a percentage of the total plan assets and is negotiable. The annualized fees for retirement plan investment consulting services are based on the following fee schedule:

Total Plan Assets	Annual Plan Consulting Fee
$0 - $1,000,000	0.75%
$1,000,001 - $5,000,000	0.50%
$5,000,001 - $10,000,000	0.40%
$10,000,001 - $20,000,000	0.30%
$20,000,001 and Above	0.20%

The annual advisory fee is paid quarterly in advance based on the value of the plan as of the last day of the prior quarter. The advisory fee is a blended fee schedule. For example, for assets under management of $2,000,000, a Client would pay 0.75% on the first $1,000,000 and 0.50% on the remaining balance. The quarterly fee is determined by the following calculation: (($1,000,000 x 0.75%) + ($1,000,000 x 0.50%)) ÷ 4 = $3125.

This does not include fees to other parties, such as record keepers, custodians, or third-party administrators. THG relies on the valuation as provided by Client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

For Retirement Plan services, fees are either paid directly by the plan sponsor or deducted directly from the plan assets by the custodian. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Clients may also pay by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

The Retirement Consulting Agreement may be terminated with written notice at least 30 calendar days in advance. Upon termination of the Advisory Contract, a prorated refund will be provided to the Client.

Educational Seminars/Speaking Engagements

Seminars and speaking engagements are offered to organizations and the public on a variety of financial topics. Fees range from $0 to $250 per participant. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. THG collects half the fee in advance with the remainder (50%) due at the conclusion of the Seminar. Advisor offers its services in a virtual or in-person setting. Should the event require travel arrangements, both parties must agree to the terms of travel (i.e. cost, distance, hotel arrangements) at the start of the engagement.

For Educational Seminars/Speaking Engagements, fees are paid by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

Clients may cancel an event with 30 days' advance written notice. Should the Client cancel the event within 30 days of the event (with the exception of weather or similar unforeseen causes), the Client will be responsible for reimbursement of any non-refundable travel expenses already incurred and a prorated fee for any work conducted in preparation of the event, based on the percentage of work done and the flat fee agreed upon by both parties. Should any fees collected in advance exceed the amount of work conducted, Advisor will provide a prorated refund within 30 days from the notice of termination.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending custodians for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

Clients may incur fees from third-party professionals such as accountants and attorneys that THG may recommend, upon Client request. Such fees are separate and distinct from THG's advisory fees.

CCR Section 260.238(j) Disclosure

Per CCR Section 260.238(j), advisory fees charged should be reasonable in light of the type of services to be provided, our experience and expertise, the sophistication and bargaining power of the client, and whether we have disclosed that lower fees for comparable services may be available from other sources.

Sale of Securities or Other Investment Products

Advisor and its supervised persons do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning and discretionary investment management services to individuals, high net-worth individuals, pension and profit sharing plans, charitable organizations, and corporations or other businesses.

We do not have a minimum account size requirement.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss

Below is a brief description of our methods of analysis and primary investment strategies when we provide securities recommendations in the context of a financial plan.

Methods of Analysis

Modern Portfolio Theory (MPT)
The underlying principles of MPT are:
- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

Use of Outside Managers: We may refer Clients to Third Party Investment advisors or advisory programs ("Outside Managers") in a sub-advisory capacity . Our analysis of Outside Managers involves the examination of the experience, expertise, investment philosophies, and past performance of the Outside Managers in an attempt to determine if that Outside Manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the Outside Manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the Outside Manager's compliance and business enterprise risks. A risk of investing with an Outside Manager who has been successful in the past is that they may not be able to replicate that success in the future. In addition, we do not control the underlying investments in an Outside Manager's portfolio. There is also a risk that an Outside Manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the Outside Manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Investment Strategies

Asset Allocation

In implementing our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. We attempt to closely monitor our asset allocation models and make changes periodically to keep in line with the target risk tolerance model.

Passive and Active Investment Management

We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio.

Active investing involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce volatility and risk.

We may engage in both passive and active investing in the Client's portfolio. However, we strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving our Clients' personal financial goals with the least amount of volatility and risk rather than attempt to outperform an arbitrary index or benchmark.

Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our Clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart/strategic beta factors. These factors may or may not result in the lowest cost ETFs and mutual funds available when utilizing funds in a Client's portfolio, but we strive to keep internal fund expenses as low as possible.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The advisor's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: Actively managed mutual funds tend to have a higher turnover rate than passive funds. A high portfolio turnover would result in higher transaction costs and in higher taxes when shares are held in a taxable account. These factors may negatively affect the account's performance. THG's investment strategy does not inherently involve a high degree of turnover risk.

Interest Rate Risk: Bond (fixed income) prices generally fall when prevailing interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when prevailing interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of the prevailing interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks. The reduction or elimination of a dividend can make a stock more volatile.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. Options activity will be limited to covered calls. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) a non-indexed ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value and a non-indexed ETF purchased at a premium may ultimately be sold at a discount; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The advisor has no control over the risks taken by the underlying funds in which the Clients invest.

Mutual Funds When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

THG and its management persons have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

THG and its management persons have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings
THG and its management persons have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of THG or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation
Neither THG or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Affiliations
Neither THG or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Related Persons
Neither THG or its management persons have any relationship or arrangement with any related parties.

Recommendations or Selections of Other Investment advisors
As referenced in Item 4 of this brochure, THG may recommend Clients to Outside Managers to manage their accounts. In the event that we recommend an Outside Manager, we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5 of this brochure). In addition, you will be provided a copy of the Outside Manager's Form ADV 2A, Firm Brochure, which also describes the Outside Manager's fee. The Client has the right to use a professional of their choosing. Moreover, THG will only recommend an Outside Manager who is properly licensed or registered as an investment advisor.

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

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description
This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.

- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matters shall reflect the credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, principal transaction, among others.

Clients who engage in one service with THG may be solicited for additional services offered by THG for additional compensation, which creates a conflict of interest. Clients always have the right to decide whether to engage the firm for the additional service(s). If the Client does choose to engage for an additional service, they may do so at a provider of their choosing. Clients have no obligation to engage THG for additional services.

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

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to mitigate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons' transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by THG's Chief Compliance Officer in advance of the transaction in an account. THG maintains a copy of access persons' personal securities transactions as required.

Trading Securities At/Around the Same Time as Client's Securities

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients' accounts in the purchase or sale of securities. The trading of the firm and its personnel is prohibited from front running or disadvantaging the Firm's trading for Clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians

We have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

With this in consideration, our firm requires Clients to utilize Charles Schwab & Co., Inc. ("Schwab"), an independent and unaffiliated SEC registered custodian firm and member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Our requirement creates a conflict of interest as our receipt of soft dollar benefits requires that the THG believes that its requirement that Clients use Schwab as their custodian is in their best interest based on the services that Schwab provides and the fees that Schwab charges. We are not affiliated with Schwab.

Research and Other Soft-Dollar Benefits

THG does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Schwab may provide us with certain services and products that may benefit us. All such soft dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and similar state statutes and rules.

The Custodian We Use -- Charles Schwab

The custodian we use maintains custody of your assets that we manage, although we may be deemed to have limited custody of your assets due to our ability to withdraw fees from your account (see Item 15 – Custody, below).

Your custody costs: For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program.

Products and services available to us from Schwab: Schwab Advisor Services is Schwab's business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you: Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients' accounts
- assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession do not require that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business and Schwab's payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select custodians") and not Schwab's services that benefit only us.

Brokerage for Client Referrals

Other than the soft dollar benefits disclosed above, we receive no referrals from a custodian, or third party in exchange for using that custodian or third party.

Clients Directing Which Custodian to Use

We do require a specific custodian for Clients to use.

Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or access persons may participate in block trading with your accounts; however, they will not be given preferential treatment.

Outside managers used by THG may block Client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13: Review of Accounts

Periodic Reviews

Jonathan Horst, Founder and CCO of THG, will work with Clients at least annually to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. THG does not provide specific reports to Clients, other than financial plans. Clients who engage us for discretionary investment management services will have their account(s) reviewed regularly at least on an annual basis by Jonathan Horst, Founder and CCO. The account(s) are reviewed with regards to the Client's investment policies and risk tolerance levels.

Triggers of Reviews

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Review Reports

Clients will receive trade confirmations from the custodian(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

THG does not provide written performance or holdings reports to Discretionary Investment Management Clients outside of what is provided directly by their custodian as part of their account statements.

Item 14: Client Referrals and Other Compensation

Compensation Received by The Horst Group, LLC

THG is a fee-only firm that is compensated solely by its Clients. THG does not receive commissions or other sales-related compensation. Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

Client Referrals from Solicitors
THG does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

THG does not accept or maintain physical custody of any Client funds or securities, or have any authority to obtain possession of them. All Client assets are held at a qualified custodian.

If THG deducts its advisory fee from Client's account(s), the following safeguards will be applied:

i. The Client will provide written authorization to THG, permitting us to be paid directly from Client's accounts held by the custodian.
ii. The custodian will send at least quarterly statements to the Client showing all disbursements from the accounts, including the amount of the advisory fee.

In jurisdictions where required, THG will send an itemized invoice to the Client at the same time it instructs the custodian to debit the advisory fee. Itemization includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

We urge you to carefully review custodial statements and compare them to the account invoices or reports that we may provide to you and notify us of any discrepancies as the custodian does not assume this responsibility. Clients should promptly notify THG of any discrepancies. Our invoices or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

For those Client accounts where we provide Discretionary Investment Management Services, THG requires discretionary authority and limited power of attorney to determine the securities and the amount of securities to be bought or sold for a Client's account without having to obtain prior Client approval for each transaction. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account(s). Additionally, the discretionary relationship will be outlined in the Advisory Contract and signed by the Client. Clients may limit our discretion by requesting certain restrictions on investments. However, approval of such requests are at the firm's sole discretion.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients. Jonathan Horst was the subject of a bankruptcy petition in October of 2009. The petition was first brought on October 29, 2009 and the petition has been discharged. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than $500 in fees six months or more in advance.

Item 19: Requirements for State-Registered advisors

Principal Officers
Jonathan Horst serves as THG's sole principal and CCO. Information about Jonathan Horst's education, business background, and outside business activities can be found on his ADV Part 2B, Brochure Supplement attached to this Brochure.

Outside Business
Jonathan Horst does not have any outside business activities.

Performance-Based Fees
Neither THG nor Jonathan Horst is compensated by performance-based fees.

Material Disciplinary Disclosures
No management person at THG has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities
THG nor Jonathan Horst have any relationship or arrangement with issuers of securities.

Business Continuity Plan
THG maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

Disclosure of Material Conflicts
All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding THG, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 1: Cover Page

The Horst Group, LLC

700 N Colorado Blvd #161
Denver CO 80206

(415) 318-7969

www.horstfp.com

Dated March 2024

Form ADV Part 2B – Brochure Supplement

For

Jonathan Horst 5558494

Founder and Chief Compliance Officer

This brochure supplement provides information about Jonathan Horst that supplements The Horst Group, LLC ("THG") brochure. A copy of that brochure precedes this supplement. Please contact Jonathan Horst if the THG brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Jonathan Horst is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 5558494.

Item 2: Educational Background and Business Experience

Jonathan Horst

Born: 1981

Educational Background

- 2006 – B.S. Finance, Accounting, and German, University of Colorado

Business Experience

- 01/2023 – Present, The Horst Group, LLC, Founder and CCO
- 06/2017 – 12/2022, Perigon Wealth Management, LLC, Investment Advisor Representative
- 02/2017 – 05/2017, Unemployed
- 12/2016 – 01/2017, Liberty Group LLC, Financial Advisor
- 01/2013 – 11/2016, LPL Financial LLC, Wealth Manager
- 05/2012 – 12/2012, Unemployed

Professional Designations, Licensing & Exams

CFP® (Certified Financial Planner):

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP®

professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

RLP® (Registered Life Planner):

To qualify for the Registered Life Planner designation, applicants must successfully complete three core training courses:

- **The Seven Stages of Money Maturity Training (16 hours)** This 2-Day course dives into the actual drivers and biases around money through listening exercises and illustrative storytelling based on *The Seven Stages of Money Maturity* philosophy. Guide your clients to discover and deliver their lives of greatest meaning.
- **EVOKE Life Planning Training (36-40 hours)** This 4-day online or 5-day residential course teaches a structured interview process used to uncover clients' most exciting, meaningful, and fulfilling aspirations so that you can efficiently and effectively support their lives with your financial expertise.
- **Life Planning Mentorship (40-50 hours)** Through a mix of writing and reviewing real life case studies, peer support, group meetings, and one-on-one coaching calls with an experienced mentor, advisors gain the confidence to live into their own life plan and deliver life planning to clients. The 6-month interactive program is often the third and final step in achieving the Registered Life Planner (RLP®) designation.
- *After earning the RLP® designation, the Advisor is expected to keep their skills sharp by attending at least eight hours of **Continuing Education** every two years.*

Item 3: Disciplinary Information

No management person at The Horst Group, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Jonathan Horst is not involved with outside business activities.

Item 5: Additional Compensation

Jonathan Horst does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through THG.

Item 6: Supervision

Jonathan Horst, as Founder and Chief Compliance Officer of THG, supervises the advisory activities of our firm. Jonathan Horst is bound by the firm's policies and procedures and Code of Ethics and will adhere to them. Clients may contact Jonathan Horst at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisors

Jonathan Horst has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, or an administrative proceeding. Jonathan Horst was the subject of a bankruptcy petition in October of 2009. The petition was first brought on October 29, 2009 and the petition has been discharged.