



**HANDY & COMPANY**  
**FINANCIAL ADVISORS, INC.**  
**REGISTERED INVESTMENT ADVISOR**

4550 Kruse Way, Suite 330  
Lake Oswego, OR 97035  
(503) 635-6100

[www.handycompany.com](http://www.handycompany.com)

December 31, 2021

## **ADV Part 2 Brochure**

This brochure provides information about the qualifications and business practices of Handy & Company Financial Advisors, Inc. (hereinafter "HCFA"). If you have questions about the contents of this brochure, please contact us at (503) 635-6100 or by email at [info@handyreagan.com](mailto:info@handyreagan.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission and Exchange Commission or by any state securities authority.

HCFA is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information from which you may determine to hire or retain an Advisor.

Additional information about Handy & Company Financial Advisors, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Handy & Company Financial Advisors, Inc. is 154417.



## ITEM 2 – MATERIAL CHANGES

Since the last amendment of this Brochure in June 2021, there have been no material changes.

Since the last filing, Item 4(e) Total assets under management were updated.

This Brochure will be amended anytime there is a material change and this section will include a summary of any material changes.

Currently our brochure may be requested by contacting us by phone at (503) 635-6100 or by email at [info@handyreagan.com](mailto:info@handyreagan.com). The brochure may also be found at [www.handycompany.com](http://www.handycompany.com).

Additional information about Handy & Company Financial Advisors, Inc. is also available via the SEC's website, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with HCFA who are registered, or are required to be registered, as investment advisor representatives of Handy & Company Financial Advisors, Inc.



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## ITEM 4 - ADVISORY BUSINESS

### 4A. Firm Description

Handy and Company Financial Advisors, Inc. (“HCFA”) is a registered investment advisor. HCFA was established in 1996 and is owned 100% by Michael R. Handy. HCFA has been registered as an investment adviser in Oregon since 1997. Nathan J. Reagan services as the Chief Compliance Officer. HCFA provides investment management, consulting, financial planning, and wealth management services to its clients. HCFA may offer its clients tax planning and tax preparation services provided by Handy and Reagan LLC, an Oregon registered CPA firm. HCFA and Handy and Reagan LLC are related through common ownership. Tax services are contracted separately from investment management services, although the services may be covered through one assets under management fee schedule.

### 4B. Types of Advisory Services

We offer investment management and financial planning services to our clients. Prospective clients receive an initial consultation at no charge to discuss the scope and suitability of our services.

#### *Investment Management*

Each portfolio is invested taking into account the investment objectives and risk tolerance of the client. Since the majority of the clients are also clients of the CPA firm, we have detailed information about their tax and financial position, ages of their children, and other investments such as real estate and closely held business interests. We use a client data gathering questionnaire for investment advisory clients. We collect suitability information at the onset of a client relationship and attempt to update this information annually. Clients who use our related CPA firm for tax preparation services receive a yearly tax organizer which includes multiple pages of questions addressing tax and investment considerations, changes, deaths, births, and other pertinent information. For non-tax clients, we send out an investment suitability questionnaire every year to identify any changes in the client situation.

All accounts we manage with investments at TD Ameritrade (“TDA”) are invested on a discretionary basis. Non-discretionary management services may be provided on an exception basis. Unmanaged or static assets will not be included in the Adviser’s management fee calculation. The adviser does not make specific recommendations regarding annuity or life insurance products. We create portfolios which may consist of, but not limited to, individual stocks or bonds, exchange traded funds (ETFs), and mutual funds. Please also refer to Item 8 of this brochure regarding investment risks associated with ETFs and mutual funds.



HCFA may provide distribution recommendations and education to participants considering a withdrawal from a previous employer retirement plan. An individual typically has various options regarding a prior employer retirement plan. Options may include: leaving the money there, rollover to a new employer, cash out the plan, or rollover to an Individual Retirement (“IRA”). Based on the facts and circumstances and discussions with the client, HCFA may recommend an investor roll over plan assets to an IRA managed by HCFA. As a result, HCFA and its representatives would earn an asset-based fee. No client or prospective client is under any obligation to roll over plan assets to an IRA managed by HCFA. HCFA would consider many factors before making any rollover recommendation such as, but not limited to: overall investment options, fees and expenses, loan considerations, additional services provided, and income tax implications.

### *Financial Planning*

Our personal financial planning services are designed to assist clients with immediate and/or long-term financial goals. Financial planning services are provided to clients at their request. Financial planning services may include preparation of a comprehensive financial plan or at the client’s request be more specific to only one or a few areas of personal financial planning. Before any financial planning services are performed, we will confirm in writing our understanding of the terms and objectives of our engagement and the nature and limitations of the services to be provided.

Financial plans are based on the financial and personal information disclosed by clients to us. We cannot guarantee the outcome of any plan. The ultimate responsibility for financial planning decisions and implementation remains with the client. At the client’s request, a financial plan may be updated if new input information is provided. Financial planning is designed to be updated and reviewed periodically as the client’s situation changes.

A financial plan will include several steps and require a time commitment from the client to gather, summarize, and communicate information to us. Our approach to the personal financial planning process will include the following steps:

- We will schedule a preliminary meeting to assist you to define short-and long-range goals and begin gathering information about your family situation and major anticipated financial obligations.
- In addition to the quantitative data requested in our financial planning questionnaire, we will require copies of all pertinent documents such as wills, trusts, company-provided fringe benefits, tax shelter forecasts, prior tax returns, and



insurance coverage. Much of this information may be present in the information we already have from you.

- After the information has been received, we will organize and review the data, utilizing appropriate technology. We will analyze the quantitative information in terms of tax liability (both income and estate), cash flow, net worth, risk management, and eventual retirement.
- A second meeting will be held at this stage to verify the accuracy of the data and to allow you to validate your assumptions used in the projections. Our analysis and recommendations are based on information you provide.
- Based on our analysis of the data, we will outline alternative strategies or courses of action to meet your immediate and long-term goals and objectives and to mitigate problems uncovered. The various alternatives are tested and their effect depicted in our projections.
- At the conclusion of the engagement, we will prepare and discuss with you a report that includes our recommendations and projections. We are available to assist in implementing the actions agreed upon. The nature and extent of our implementation services will be established at that time.
- Responsibility for financial planning decisions is yours. We will aid you in the decision-making process, suggest alternative recommendations to help you achieve your objectives, and assist you to determine how well each alternative meets your financial planning objectives. Investment recommendations should be made by a registered investment adviser or other licensed investment adviser you choose and engage. If our firm provides any investment management services to you these would be included under a separate contract titled, Investment Management Agreement.

#### **4C. Client Tailored Relationships**

As a fiduciary, HCFA always acts solely in your best interest. The Adviser owes the client a fiduciary duty to put the client's interest first which includes, but is not limited to a duty of care, loyalty, obedience, and utmost good faith. Your portfolio investment strategy is customized and tailored to your unique circumstances, including your investment objectives and preferences, risk tolerance and capacity, and investment horizon. A client may always make specific investment requests or discuss investment strategies with their advisor.

As part of our financial planning and wealth management services, HCFA may provide guidance regarding non-investment related matters. Neither HCFA nor any of its representatives serves as an attorney or insurance advisor and no portion of HCFA's services should be construed as legal or insurance advice. To the extent requested by a client, HCFA may recommend the services of other professionals for non-investment implementation



purposes. We are not compensated by anyone for client referrals to other professionals. You are under no obligation to engage in the services of any such recommended professional. Clients have the option to purchase investment products that we may recommend through other brokers or agents that are not affiliated with us. You retain absolute discretion over all such implementation decisions and are free to accept or reject any recommendation from us. It will be Client's responsibility to advise Adviser of the investment objectives of the Portfolio and of any changes or modifications therein as well as any specific investment restrictions applicable thereto and to give Advisor prompt written notice if Client deems any investments made to the Account to be in violation of such objectives or restrictions.

**4D. Wrap Free Program**

HCFA is a fee only advisor and does not participate in "wrap" programs.

**4E. Assets under Management (AUM)**

As of December 2021, HCFA manages \$62,685,222 on behalf of our clients. HCFA has no assets managed on a non-discretionary basis. All assets are managed on a discretionary basis.

**ITEM 5 - FEES AND COMPENSATION**

**5A. Fee Schedule**

Investment Management

Fees are charged for assets under management. Fees are negotiable. We do not charge commissions. The fee percentages decline as the assets under management increase. The investment advisory fees can include a tax return discount component with 10% of the investment advisory fee amount applied against the tax return preparation by our related CPA firm, when CPA services are requested and provided. For clients with more than one investment account, the accounts are aggregated for purposes of calculating the fee and then allocated among the accounts based upon assets under management. Accounts are aggregated by household, meaning partner and spouse accounts will be grouped for billing purposes. Aggregated accounts will be displayed on client invoices. Management fees are calculated according to the following annualized tiered schedule:

<b>Assets Under Management</b>	<b>Annual Fee (in %)</b>
Up to \$100,000	1.40%
Next \$100,000-\$250,000	1.20%
Next \$250,000-\$500,000	0.96%
Next \$500,000-\$1,000,000	0.88%
Next \$1,000,000-\$2,000,000	0.80%
All assets over \$2,000,000	Fee is negotiated



The fees for trust accounts are separately negotiated depending upon the range of services to be provided.

**EXAMPLE** fee calculation - a hypothetical account with a \$625,000 account balance at the end a quarter would be billed \$1,675 for that quarter. The calculation for the quarterly fee in this example is as follows:

First \$100,000 of assets:	\$100,000 x 0.35% = \$350
+ assets between \$100,000 to \$250,000:	\$150,000 x 0.30% = \$450
+ assets between \$250,000 to \$500,000:	\$250,000 x 0.24% = \$600
+ assets between \$500,000 to \$1,000,000:	<u>\$125,000</u> x 0.22% = <u>\$275</u>
	\$625,000                      \$1,675

In all instances, the Adviser will send the client a written invoice, including fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable the amount of assets under management on which the fee was based. Also, the Adviser will include the name of the custodian(s) on your fee invoice. The Adviser will send these to the client concurrent with the request for payment or payment of the Adviser's advisory fees. We urge the client to compare this information with the fees listed in the account statement.

When the client does not receive the ADV Part 2 (Brochure) at least 48 hours prior to entering into an investment advisory agreement the advisory client has a right to terminate the contract without penalty within five business days after entering into the contract.

In computing the market value of any investment of the Portfolio, each security listed on any national securities exchange shall be valued at the last quoted sale price on the valuation date on the principal exchange on which such security is traded. Any other security or asset shall be valued in a manner determined consistent with Adviser's fiduciary duty by Advisor to reflect its fair market value. We do not value your securities. For other securities or investment instruments which do not trade on a public exchange we would use values as provided by your custodian or issuer of such securities.

**Financial Planning**

Fees for financial plans typically range from \$1,500 - \$5,000. A specific fee range or fee quote is agreed upon in advance. The total financial planning fee is based on the time involved, complexity of issues, and scope of work to be included. The total financial planning fee is based on an hourly rate of \$200 per hour. Any fee for financial plan updates will be agreed upon in advance. Fees for financial plans are negotiable. We will submit our fee invoice to you for payment at the end of our second meeting when we present an initial draft financial plan to you. In all cases, any fee for financial planning will be agreed upon in advance. Financial planning fees will be offset for related advisory services of assets being managed by the Advisor.



In the event a client contract is terminated by either party prior to completion, we will bill for any portion of the plan which has been completed and provided to the client.

Fees for financial planning services must be paid by check.

**5B. Fee Payments**

Investment management fees are only billed in arrears at the end of each calendar quarter. Fees shall be accrued quarterly at the end of each calendar quarter, computed on each March 31, June 30, September 30, and December 31. Wealth management fees are generally paid from your designated account by the custodian when we submit an invoice to them. Wealth management fees are calculated at the end of each calendar quarter, based on the value of your assets under management on the last trading day of each calendar quarter.

For partial billing periods, fees will be prorated based upon the number of days the account was open during the billing period.

**5C. Third Party Fees**

Clients pay transaction fees to TD Ameritrade on securities purchased and sold. The transaction fees charged by TD Ameritrade are available on their web site. Each client is provided information on how to access their account information online at TD Ameritrade.

You are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees HCFA charges. All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions in your account will be paid out of the assets in the account and are in addition to the investment management fees paid to HCFA. In addition to statements sent by us, you will receive statements directly from these brokers, custodians, or mutual funds or other investments you hold. We strongly urge you to compare these statements for accuracy.

**5D. Insufficient Funds and Refunds**

If there is insufficient cash in your account to pay our fees, we will confirm with you the liquidation of securities to pay the fees. Otherwise, we will contact you to arrange for the payment of fees. In addition to our fees, there may be custodial, mutual fund or similar third party management fees and charges. Clients may not pay fees in advance.

When an agreement is terminated, all assets may need to be transferred from the current custodian. An investment advisory contract may be terminated in writing, by phone, or email. The quarterly (or annual) fee shall be prorated and calculated as of the date the notice of termination was mailed. If a contract is terminated by verbal notice, the effective date of the termination will be the date of the verbal notice.

**5E. Other Investment Compensation**



We do not accept compensation from the sale of securities or other investment products. We are a fee-only investment advisory practice.

## **ITEM 6 - PERFORMANCE BASED FEES**

HCFA does not charge performance based fees (i.e. fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **ITEM 7 - TYPES OF CLIENTS**

HCFA provides investment advisory services to individuals; high net worth-individuals; pension, profit sharing and other types of qualified retirement plans; trusts, charitable trusts, educational trusts; estates; corporations, LLCs, partnerships and other business entities.

### *Minimum Account Size*

In many situations, HCFA has a minimum portfolio size of \$100,000. This minimum is negotiable and waived for tax clients of the CPA practice and participants in company plans such as Simple IRA plans where each participant has an IRA account.

## **ITEM 8 - METHODS OF ANALYSIS**

### **8A-B. Methods of Analysis, Investment Strategies and Risk of Loss**

We primarily use the research of Dimensional Funds Advisors (DFA) which is based upon the work of Eugene Fama, a Nobel Prize winner in economics on how capital markets work as the foundation for our investment approach. We use a long-term investment horizon approach. DFA research shows the following:

- Loss can be reduced by diversification with a broadly based allocation of securities over differing asset classes.
- Large, small and international equities in a portfolio improves the rate of return with about the same level of risk as a US large company only portfolio over the long term
- Bonds and fixed income investments serve to substantially reduce the overall risk in a portfolio
- Bonds within seven years of maturity are less volatile than longer term bonds and have better risk adjusted returns
- Small companies outperform large companies over the long term but have more volatility
- Value outperforms growth over the long term

**Portfolios** – We use Dimensional Fund Advisors (DFA), Vanguard, Pimco, and Black Rock (iShares) as the core for most of our client portfolios. The primary allocation is between



equity and interest and dividend investments. For clients with a longer time horizon, we would use more equity investments. For those with a short time horizon or those clients retired, we use a larger allocation to income and dividend investments. Client tolerance for risk is also an allocation factor.

**Interest and Dividend Investments** – We use utilities, preferred stocks, real estate investment trusts, and MLP’s as well as traditional bonds for this portion of the portfolio. For taxable portfolios we also use tax-exempt bond investments.

**Distribution Analysis** – We manage distribution for our clients. We are continual readers of scholarly analysis of the distribution techniques and percentages which can be used to preserve a client’s capital. The 4% method which provides for a distribution of 4% of a client’s portfolio to the client each year. The RMD method which provides for an annual distribution percentage based upon the age of the client. Part of the strategies is having a distribution portfolio collect interest and dividends in cash and not reinvest the proceeds. Also, part of the strategy is the selection of investments to sell to provide the cash for distribution. The distribution from client accounts is an ongoing active process.

**DFA Investment portfolio against indexes** - We show clients how DFA asset class investments have performed against the applicable benchmarks. For example, we compare the US Small Company investment against the Russell 2000 (small company) index.

**Morningstar** – We use our Morningstar software to analyze the actual investment in the specific client portfolio we have invested, which shows the investor many quantitative investment factors for their portfolio. The factors would include rate of return, risk, and rate of return compared to indexes. There are also technical analysis calculations for items like alpha, beta, r-squared, etc. The analysis also shows the cost of the various investments at fund (mutual funds) and asset class stocks (ETFs). This makes it easier to compare costs with our approach compared to a selection of retail mutual funds.

**Charting** – We follow the major indexes on each market day to gage the market including volume, fifty day and two hundred day moving averages. We also follow the volatility index (VIX) to determine the relative volatility in the market. During periods of high volatility we tend to neither purchase nor sell securities.

**Risk of Loss** – All investments include a risk of loss which you should be prepared to bear. Investment in the financial markets involves risk and past results are no guarantee of future performance. Clients are advised of this risk. The amount of risk is quantified as standard deviation for each of the seven major asset classes and three different portfolios comprised of combinations of these major asset classes. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use



our best efforts and expertise to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

### **8C. Security Recommendations**

We usually recommend mutual funds and ETFs for client portfolios since the risk is spread over many different investments. We will have some individual stock or bond positions in certain portfolios. The overall portfolio is built around the individual positions to arrive at the diversification we seek.

**Mutual Fund and ETF Risk** - An investment in a mutual funds or ETFs involves risk, including the risk that the security price may decline. Mutual funds and ETFs are comprised of a group of securities like stocks and bonds which are imbedded in the investment. The S&P 500 ETF for example would have common stock shares of five hundred companies which make up the S&P 500. The price of the ETF would reflect the value of each of five hundred companies in the ETF. The price of the S&P 500 is quoted continually throughout the trading day. The ETF at day's end will reflect the value of the S&P 500 at days end.

An ETF is traded and valued like a stock throughout the trading day and will increase or decrease in value. A mutual fund is valued for purchase or sale only at the end of the trading day and will increase or decrease in value from the prior day closing price. There are mutual fund S&P 500 investments as well as ETFs. The securities are same. The difference is the ETF can be traded throughout the day, while the mutual fund is traded only at the end of the day.

We generally invest in broad based ETFs and mutual funds primarily from Dimensional Fund Advisors, Vanguard, Pimco and Black Rock (iShares). These investments are large scale funds that provide easy liquidity to buy or sell and have low fees at fund.

## **ITEM 9 - DISCIPLINARY INFORMATION**

### **9A. Civil or Criminal Actions**

HCFA has never been found guilty, convicted or plead no contest to a criminal or civil action in a domestic, foreign or military court.

### **9B. Administrative Enforcement Proceedings**

HCFA and its principals have never been found by the SEC, any other state or federal agency or any foreign regulatory agency to have caused loss of the ability of an investment-related business to do business or been sanctioned, barred or limited in investment-related activities.

### **9C. Self-Regulatory Organization Enforcement Proceedings**

HCFA and its principals have never been found by a self-regulatory agency to have caused loss of the ability of an investment-related business to do business. Additionally, Handy & Company Financial Advisors, Inc. and its principals have never been found in violation of self-regulatory agencies rules such that they were barred, suspended, limited in advisory functions or fined.



## **ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITY AND AFFILIATIONS**

### **10A. Broker-Dealers and Registered Representatives**

HCFA is not registered as a broker-dealer and our employees are not registered representatives of any broker-dealer.

### **10B. Registration or an Associated Person of a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither HCFA nor our employees hold any of the above registrations.

### **10C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

The principal business of HCFA is that of a registered investment advisor and provider of financial planning services. HCFA has a relationship with Handy & Reagan, LLC through common ownership.

In addition, Handy & Reagan, LLC provides tax preparation and tax planning services to many of the clients of HCFA. Investment advisory clients of HCFA are not required to use Handy & Reagan, LLC for their CPA services, but may choose to do so. It is possible that tax deadlines associated the CPA firm services may present an inherent conflict of interest with availability of certain Advisers. HCFA has one adviser who is dedicated to serving the investment advisory clients and whose time will not be impacted by tax deadlines associated with CPA firm services.

HCFA will disclose any material conflict of interest relating to HCFA, our representatives, or any of our employees that could reasonably be expected to impair the rendering of unbiased and objective advice.

### **10D. Selection of Other Advisors and How this Advisor is Compensated for those Selections**

HCFA is not paid for the selection of other advisors, asset managers or portfolio managers.

HCFA shares fees and employees in some client arrangements with our CPA firm, Handy & Reagan LLC. HCFA also shares a physical location with Handy & Reagan LLC.

## **ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **11A. Code of Ethics**

We are not a SEC registered advisor. We adhere to a code of ethics as promulgated by the American Institute of Certified Public Accountants and Oregon Society of CPAs. We take four



hours of continuing education classes every two years on ethics for our CPA license. There is not a similar requirement for a registered advisor. While the code of ethics for CPAs and investment advisors has some commonality, the ethical requirements for CPAs are more strict.

The CPA Code of Ethics includes provisions relating to the confidentiality of client information.

**11B, 11C AND 11D. Participation or Interest in Client Transactions**

HCFA, or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for our clients. We will always buy or sell from our clients' accounts before we buy or sell from our accounts. In some cases, HCFA or its employees, may buy or sell securities for our own accounts and not for clients' accounts, as it may not meet the objectives or plans for the client.

HCFA will always maintain full disclosure with our clients so that they can make informed decisions. We will always evaluate our activity from the view of our clients to ensure that any and all required disclosures are made. For example, we will disclose anything that would cause a client to be unfairly influenced to make any decision regarding actions or inactions in their account.

HCFA will also not cross trades between client accounts.

Neither HCFA or a related person recommends to clients, or buys or sells for client accounts, securities in which any owner or related person has a material financial interest.

**ITEM 12 - BROKERAGE PRACTICES**

**12A. Selecting Brokerage Firms**

We selected TD Ameritrade ("TDA") to custody our client investments. TDA has a division of their firm for investment advisors. We are a fee-only investment advisory practice and TDA charges transaction fees for securities purchased and sold. We have stayed with TDA because of their level of service to our clients. We consider their transaction fees most reasonable.

1. **Research and other soft dollar benefits** – HCFA may receive research products, training programs, and software tools from our custodian, TD Ameritrade.
2. **Brokerage for client referrals** – We only use TDA for client accounts so we have no financial incentive to recommend other broker-dealers. TDA does not provide client referrals to HCFA.
3. **Directed Brokerage** – We only use TDA for client investments we manage. If a client wants to use another brokerage, we do not provide investment advisory services.



**12B. Sales Aggregation**

We are authorized to aggregate purchases and sales made for your account with purchases and sales in the same securities for other clients of ours. When we aggregate transactions, the actual price applicable will be averaged and the securities allocated to the client accounts. We do not generally deal in transaction sizes where sales aggregation would be applicable. Should we engage in a sales aggregation transaction, the actual price will be averaged and the securities allocated to client accounts.

**ITEM 13 - REVIEW OF ACCOUNTS**

**13A and 13B. Periodic Reviews and Review Triggers**

We periodically review client accounts. The frequency of account reviews will be determined based on the individual client's investment objectives, but not be completed less than annually. The most common time we review with clients is when the client brings in their annual tax information for us to prepare their tax returns. The frequency of other reviews depends upon the client's objectives or other life events. Periodic account reviews may be completed by either Michael Handy or Nathan Reagan. Any account review completed by Michael Handy will also be supervised by Nathan Reagan. Reviews are conducted primarily for the purpose of assuring continued general compliance with the financial goals outlined in each client's investment profile and notes to the file. Material additions to, or subtractions from, an account will trigger additional portfolio reviews.

**13C. Regular Reports**

Clients receive account statements monthly from the custodian. On a quarterly basis we provide reports to clients on their portfolios which show positions in the account and the performance of each position for the period(s) selected. Included with the quarterly report is a newsletter we write which shows the performance of major indexes for each quarter and other periods. We include economic news, and tax information of interest to investors.

**ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

**14A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

HCFA does not receive economic benefits from third parties for providing investment advice or other advisory services to our clients.

**14B. Compensation to Non-Advisory Personnel for Client Referrals**

HCFA does not directly or indirectly compensate any person for client referrals.



## **ITEM 15 - CUSTODY**

We do not have custody of client funds or securities. TDA sends monthly statements to clients showing positions in their portfolios and transactions for the month. At times, a client will write a check to TD Ameritrade for an IRA contribution and we will mail it to TDA. HCFA urges clients to compare their account statements from TDA to the quarterly statements we distribute. Clients are also urged to compare the account statements they receive from the qualified custodian with invoices and statements from HCFA.

## **ITEM 16 - INVESTMENT DISCRETION**

HCFA has discretionary authority to manage client securities on their behalf. We invest clients' funds according to a strategy consistent with the clients' stated investment objectives. When the client wishes to change the strategy, we change the allocation in the portfolio. Each client signs an investment advisory agreement with HCFA granting us discretionary authority to invest their account. In addition, the forms they sign with TDA also grant us discretionary authority to invest their account without our client's prior approval.

## **ITEM 17 - VOTING CLIENT SECURITIES**

HCFA does not vote proxies on behalf of investment advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive proxy materials directly from the account custodian. Clients may contact HCFA with questions about a particular solicitation.

## **ITEM 18 - FINANCIAL INFORMATION**

### **18A. Balance Sheet**

HCFA bills in arrears and does not solicit prepayment of advisory fees.

### **18B. Financial Conditions**

HCFA has no financial issues that could impair our ability to carry out our fiduciary duty to our clients.

### **18C. Bankruptcy Petition**

HCFA has never been the subject of a bankruptcy petition.



## **ITEM 19 – REQUIREMENTS FOR STATE REGISTERED ADVISORS**

Complete brochure supplements for Michael R. Handy and Nathan J. Reagan, which include all information required under this section, are on the following pages.

Representatives are not compensated with performance-based fees.

HCFA, nor its representatives, have any relationship or arrangements with any issuer of securities.

**HANDY & COMPANY**



**FINANCIAL ADVISORS, INC.**  
**REGISTERED INVESTMENT ADVISOR**

4550 Kruse Way, Suite 330  
Lake Oswego, OR 97035  
(503) 635-6100

[www.handycompany.com](http://www.handycompany.com)

December 31, 2021

**ADV Part 2B Brochure Supplement**

**Nathan Reagan**

This brochure provides additional information about Nathan Reagan that supplements the Handy & Company Financial Advisors, Inc. ADV Part 2A Brochure.

This brochure provides information about the qualifications and business practices of Handy & Company Financial Advisors, Inc. (hereinafter "HCFA"). If you have questions about the contents of this brochure or this supplement, please contact us at 503-635-6100 or by email at [info@handyreagan.com](mailto:info@handyreagan.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission and Exchange Commission or by any state securities authority.

Additional information about Nathan Reagan and Handy & Company Financial Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Handy & Company Financial Advisors, Inc. is 154417.



## Item 2 – Educational Background and Business Experience

CRD number: 6209549  
Year Born: 1981

### Educational Background:

BS, Business and Accounting – University of Idaho (2003)

### Business Background:

2013 - Present	Investment Advisor Representative, Handy & Company Financial Advisors, Inc.
2012 - Present	Tax Partner, Handy & Reagan, LLC
2004-2011	Tax Manager, Moss Adams LLP

### Professional Designations:

Certified Public Accountant (CPA)\*  
Personal Financial Specialist (PFS)\*

## Item 3 – Disciplinary Action

Nathan Reagan has no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4 – Other Business Activities

The principal business of Nathan Reagan is offering CPA services under Handy & Reagan, LLC. He spends approximately 30 hours per week providing CPA services including tax services. Any additional time for Mr. Reagan is allotted to investment advisory services for HCFA. It is possible that tax deadlines associated the CPA firm services may present an inherent conflict of interest with availability of Mr. Reagan at certain times, including trading hours. Since HCFA has two advisors and the CPA firm has a total of three licensed CPAs, one of which who is not associated with HCFA, the time commitments of each business activity for Mr. Reagan are adequately supported by other individuals and the fact that many service aspects overlap.

## Item 5 – Additional Compensation

Mr. Reagan does not receive any additional compensation that is required under this Item 5.

## Item 6 – Supervision

Mr. Reagan supervises his own activities as the Chief Compliance Officer.

## Item 7 – Requirements for State-Registered Advisers



Nathan Reagan has not been found liable in any arbitration claim alleging damages of \$2,500, nor has been found liable in a civil, self-regulatory organization, or administrative proceeding.

Mr. Reagan has never been the subject of a bankruptcy petition.

Mr. Reagan has no relationship or arrangement with any issuer of securities.

### **Personal Financial Specialist (PFS)**

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. To attain the PFS credential, a candidate must hold an unrevoked CPA license, certificate, or permit, none of which are in inactive status; fulfill 3,000 hours of personal financial planning business experience; complete 75 hours of personal financial planning CPE credits; pass a comprehensive financial planning exam and be an active member of the AICPA. A PFS credential holder is required to adhere to AICPA's Code of Professional Conduct and the Statement on Standards in Personal Financial Planning Services, when providing personal financial planning services. To maintain their PFS credential, the recipient must complete 60 hours of financial planning CPE credits every three years. The PFS credential is administered through the AICPA.

### **Certified Public Accountant (CPA)**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services.

In addition to the Code of Professional Conduct, AICPA members who provide personal financial planning services are required to follow the Statement on Standards in Personal Financial Planning Services (SSPFPS).



**HANDY & COMPANY**  
**FINANCIAL ADVISORS, INC.**  
**REGISTERED INVESTMENT ADVISOR**

4550 Kruse Way, Suite 330  
Lake Oswego, OR 97035  
(503) 635-6100

[www.handycompany.com](http://www.handycompany.com)

December 31, 2021

**ADV Part 2B Brochure Supplement**

**Michael R. Handy**

This brochure provides additional information about Michael R. Handy that supplements the Handy & Company Financial Advisors, Inc. ADV Part 2A Brochure.

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Additional information about Michael R. Handy and Handy & Company Financial Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for Handy & Company Financial Advisors, Inc. is 154417.



## Item 2 – Educational Background and Business Experience

CRD number: 2902921  
Year Born: 1946

### Educational Background:

MBA, Taxation – University of Southern California (1976)  
BS, Accounting – University of Nevada (1969)

### Business Background:

1996 - Present	Investment Advisor Representative, Handy & Company Financial Advisors, Inc.
2012 - Present	Tax Partner, Handy & Reagan, LLC
1995-2011	Tax Partner, Michael R. Handy, CPA PC

### Professional Designations:

Certified Public Accountant (CPA)\*

## Item 3 – Disciplinary Action

Michael R. Handy has no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4 – Other Business Activities

Michael R. Handy spends approximately 3/4 of his professional time in investment advisory and the other 1/4 in tax services. There is a significant overlap in investment advisory and tax services. Mr. Handy's time spent providing tax services is primarily related to tax planning associated with HCFA investment advisory clients. His time spent providing tax services is not driven by tax compliance deadlines and is secondary to his time spent providing investment advisory services and does not interfere with his availability during trading hours.

## Item 5 – Additional Compensation

Michael R. Handy does not receive any additional compensation that is required under this Item 5.

## Item 6 – Supervision

Mr. Handy will be supervised by Nathan Reagan.

## Item 7 – Requirements for State-Registered Advisers



Michael R. Handy has not been found liable in any arbitration claim alleging damages of \$2,500, nor has been found liable in a civil, self-regulatory organization, or administrative proceeding.

Mr. Handy has never been the subject of a bankruptcy petition.

Mr. Handy has no relationship or arrangement with any issuer of securities.

### **Certified Public Accountant (CPA)**

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services.

In addition to the Code of Professional Conduct, AICPA members who provide personal financial planning services are required to follow the Statement on Standards in Personal Financial Planning Services (SSPFPS).



## **PRIVACY STATEMENT**

HCFA is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. Our privacy policy applies to current and former clients.

### **INFORMATION WE COLLECT**

The categories of non-public information that we collect from you may include information about:

- Your personal finances;
- Information about your health (to the extent that it is needed for the financial planning process); Information about your transactions with us or others; and
- Information about transactions between you and third parties.

We use the above information to help you with your financial goals and/ or tax planning or preparation.

### **INFORMATION WE DISCLOSE**

We do not disclose any nonpublic personal information about you to anyone, except as permitted by law. We do not tell information to anyone.

With your permission, we may disclose limited information to attorneys, accountants, mortgage lenders and other professionals with whom you have established a relationship. You may opt out from our sharing information with these non-affiliated third parties by notifying us at any time by telephone, mail, fax, email or in person.

If you decide to close your account(s) or become an inactive customer, we adhere to the privacy policies and practices as described in this notice.

### **OUR SECURITY PROCEDURES**

We maintain a secure office to ensure that your information is not placed at unreasonable risk. In addition, we restrict access to your personal and account information to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

We will notify you in advance if our privacy policy is expected to change.