

Introduction

Our firm, Midwest Financial Partners Investments, is an investment adviser registered with the Securities and Exchange Commission. We feel it is important for you to understand how advisory, brokerage services and fees differ in order to determine which type of account is right for you. There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about investment advisers, broker-dealers, and investing.

What investment services and advice can you provide me?

We are a registered investment adviser offering investment advisory services to retail investors for an ongoing asset-based fee. Our advisory services include Comprehensive Portfolio Management. If you open an advisory account with our firm, we'll meet with you to understand your current financial situation, existing resources, goals, and risk tolerance. Based on what we learn, we'll recommend a portfolio of investments monitored at least weekly, and if necessary, rebalanced to meet your changing needs, stated goals and objectives. We'll offer advice on a regular basis and contact you at least annually to discuss your portfolio.

Financial planning is included in our Comprehensive Portfolio Management service for no additional fee.

You can select in our agreement whether we are allowed to buy and sell investments in your account without asking you in advance ("discretion") or only buy and sell investments in your account after receiving your permission ("non-discretion"). If you select non-discretion, you make the ultimate decision regarding the purchase or sale of investments. Any limitations will be described in the signed advisory agreement. We will have discretion or non-discretion until the advisory agreement is terminated by you or our firm.

We do not restrict our advice to limited types of products or investments.

Our firm does not impose requirements for opening and maintaining accounts or otherwise engaging us.

Additional information about our advisory services is located in Item 4 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/brochure/173790>.

Questions to Ask Us:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do those qualifications mean?

What fees will I pay?

You will be charged an ongoing quarterly fee based on the value of the investments in your account. Our tiered fee schedule ranges from 1.26% to 0.75% depending on the value of the investments in your account. Clients with accounts custodied at Fidelity Brokerage Services are assessed a flat fee of 0.30%. Our fees may be negotiable. The amount you pay will depend on the amount of assets in your account. The more assets you have in your advisory account, the more you will pay us. However, your marginal rate (meaning, the fee paid on each additional dollar), goes down as your assets go up. We therefore have a common incentive to increase the assets in your advisory account in order to increase our fees.

Our firm's fees will be automatically deducted from your advisory account, which will reduce the value of your advisory account.

The custodian that holds your assets charges you an asset-based fee which is in addition to our firm's fees.

Some investments, such as mutual funds, index funds and exchange traded funds, charge additional fees that will reduce the value of your investments over time.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Additional information about our fees is located in Item 5 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/brochure/173790>.

Questions to Ask Us:

- Help me understand how these fees and costs may affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means:

An affiliated company serves as a trustee, provides bill pay services or acts as an agent for clients. Our financial professionals have an incentive to recommend that you use the affiliated company's services in order to increase their compensation.

Additional information about our conflicts of interest is located in Items 10 and 15 of our Firm Brochure, which is available online at <https://adviserinfo.sec.gov/firm/brochure/173790>.

Questions to Ask Us:

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

How do your financial professionals make money?

Our financial professionals are compensated based on the revenue our firm earns from their advisory services and the amount of client assets they service.

Do you or your financial professionals have legal or disciplinary history?

No, our firm and financial professionals do not have any legal or disciplinary history to disclose. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Additional Information

You can find additional information about our firm's investment advisory services on the SEC's website at www.adviserinfo.sec.gov by searching CRD #173790. You may also contact our firm at (320) 251-3752 to request a copy of this relationship summary and other up-to-date information.

Questions to Ask Us:

- Who is my primary contact person?
- Is he or she a representative of an investment adviser or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?

Item 1: Cover Page
Part 2A of Form ADV: Firm Brochure
March 2022

Midwest Financial Partners
912 West St. Germain Street, Suite 300
Saint Cloud, MN 56301
www.mfpmn.com

Firm Contact:
Mark P. Boyle
Chief Compliance Officer

This brochure provides information about the qualifications and business practices of Midwest Financial Partners Investments, Inc. dba Midwest Financial Partners. If you have any questions about the contents of this brochure, please contact us by telephone at (320) 251-3752 or email m.boyle@mfpmn.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. Additional information about Midwest Financial Partners also is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD 173790.

Please note that the use of the term "registered investment adviser" and description of Midwest Financial Partners and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Material Changes

Midwest Financial Partners is required to advise you of any material changes to the Firm Brochure ("Brochure") from our last annual update. Clients can then determine whether to review the brochure in its entirety or to contact us with questions about the changes.

Since our last annual amendment filed on March 4th, 2021, we have the following material changes to disclose:

- We have moved to a new suite number. Our new address is 912 West St. Germain Street, Suite 300, Saint Cloud, MN 56301.
- We have also updated Item 5 to disclose that bond ladders will be charged a fixed rate of 0.20% or the initially assessed fixed fee rate. CDs will be charged a fixed rate of 0.10%. Please see Item 5 for additional information.

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Item 4: Advisory Business

We are dedicated to providing individuals and other types of clients with a wide array of investment advisory services. Our firm is a corporation formed in the State of Minnesota. Our firm has been in business as an investment adviser since 2014 and is wholly owned by Thomas D. St. Hilaire through his personal trust.

Description of the Types of Advisory Services We Offer

Comprehensive Portfolio Management:

Our Comprehensive Portfolio Management service encompasses asset management as well as providing financial planning/financial consulting to clients. It is designed to assist clients in meeting their financial goals through the use of financial investments. We conduct at least one, but sometimes more than one meeting (in person if possible, otherwise via telephone conference) with clients in order to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what we learn, we propose an investment approach to the client. We may propose an investment portfolio, consisting of exchange traded funds (“ETFs”), mutual funds, individual stocks or bonds, or other securities. Upon the client’s agreement to the proposed investment plan, we work with the client to establish or transfer investment accounts so that we can manage the client’s portfolio. Once the relevant accounts are under our management, we review such accounts on a regular basis and at least annually. We may periodically rebalance or adjust client accounts under our management. If the client experiences any significant changes to his/her financial or personal circumstances, the client must notify us so that we can consider such information in managing the client’s investments.

Retirement Plan Consulting:

Our firm provides retirement plan consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting employer plan sponsors 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.

Retirement Plan Consulting services typically include:

- Establishing an Investment Policy Statement – Our firm will assist in the development a statement that summarizes the investment goals and objectives along with the broad strategies to be employed to meet the objectives.
- Investment Options – Our firm will work with the Plan Sponsor to evaluate existing investment options and make recommendations for appropriate changes.
- Asset Allocation and Portfolio Construction – Our firm will develop strategic asset allocation models to aid Participants in developing strategies to meet their investment objectives, time horizon, financial situation and tolerance for risk.
- Investment Monitoring – Our firm will monitor the performance of the investments and notify the client in the event of over/underperformance.

In providing services for retirement plan consulting, our firm does not provide any advisory 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”).

All retirement plan consulting services shall be in compliance with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans (“Plan”) governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). If the client accounts are part of a Plan, and our firm accept appointments to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) or 3(38) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein.

Tailoring of Advisory Services

We offer individualized investment advice to clients utilizing our Comprehensive Portfolio Management service. Additionally, we offer general investment advice to clients utilizing our Retirement Plan Consulting, service. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account. Restrictions would be limited to our Comprehensive Portfolio Management service.

Participation in Wrap Fee Programs

We do not offer wrap fee programs.

Regulatory Assets Under Management

We manage \$953,235,570 on a discretionary basis and \$29,507,063 on a non-discretionary basis as of December 31st, 2021. Our total assets under management is \$982,742,633.

Item 5: Fees & Compensation

How We Are Compensated for Our Advisory Services

Comprehensive Portfolio Management:

Assets Under Management	Annual Percentage of Assets Charge
\$0 to \$250,000	1.26%
\$250,001 to \$500,000	1.02%
\$500,001 to \$1,000,000	0.99%
\$1,000,001 to \$2,000,000	0.78%
\$2,000,001 to \$5,000,000	0.71%
\$5,000,001 to \$10,000,000	0.75%
Over \$10,000,000	0.75%

Our firm’s annualized fees are billed on a pro-rata basis quarterly in advance based on the value of your account on the last day of the previous quarter. Fees for accounts custodied at Pershing Advisor Solutions, LLC (“Pershing”) are assessed according to the tiered fee schedule above. For example, a client with \$1,000,000 in assets under management will be assessed a fee of 1.26% on those assets under \$250,000, 1.02% for assets between \$250,001 and \$500,000, and 0.99% for assets between \$500,001 and \$1,000,000. Clients with accounts custodied at Fidelity Brokerage Services (“Fidelity”) are assessed a flat fee of 0.30%. Bond ladders will be charged a fixed rate of 0.20% or the initially assessed fixed fee rate. CDs will be charged a fixed rate of 0.10%. Unless indicated otherwise in writing, our firm bills on cash. The specific billing arrangement will be detailed in the signed client

agreement and investment policy statement. Fees are negotiable and will be deducted from your managed account. As part of this process, the client is made aware of the following:

- a) Your independent custodian sends statements at least quarterly to you showing the market values for each security included in the assets managed by our firm and all disbursements in your account including the amount of the advisory fees paid to us;
- b) You provide authorization permitting us to be directly paid by these terms. We send our invoice directly to the custodian; and
- c) If we send a copy of our invoice to you, it will include a legend urging you to compare information provided in our statement with those from the qualified custodian.

Related Accounts, those belonging to a member of a client's family, participating in the Comprehensive Portfolio Management service may be aggregated for advisory fee purposes, so that each account will pay a fee which is calculated on the basis of the total of all Related Accounts. Related Accounts will be specified in the client's advisory agreement.

Retirement Plan Consulting:

The maximum annual fee charged will not exceed 1.00% of the Plan assets under management. The fee-paying arrangements for retirement plan consulting service will be determined on a case-by-case basis and will be detailed in the signed Retirement Plan Consulting Agreement.

Other Types of Fees & Expenses

Clients with assets custodied at Pershing are charged an annual 0.10% fee on eligible assets. Also, clients will pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses).

Fidelity eliminated transaction fees for U.S. listed equities and exchange traded funds for clients who opt into electronic delivery of statements or maintain at least \$1 million in assets at Fidelity. Clients who do not meet either criteria will be subject to transaction fees charged by Fidelity for U.S. listed equities and exchange traded funds. Pershing has not eliminated transaction fees for U.S. listed equities and exchange traded funds, so clients may pay for investing in the same securities in Pershing. However, our firm primarily recommends mutual funds and does not typically recommend U.S. listed equities and exchange traded funds.

Termination & Refunds

Either party may terminate the advisory agreement signed with our firm by providing written notice to the other party. Upon notice of termination, we will proceed to close out your account and process a pro-rata refund of any unearned advisory fees.

Commissionable Securities Sales

Our firm and representatives do not sell securities for a commission in advisory accounts.

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

We do not charge performance-based fees.

Item 7: Types of Clients & Account Requirements

We have the following types of clients:

- Individuals, Families, and High Net Worth Individuals;
- Trusts, Estates or Charitable Organizations;
- Pension and Profit Sharing Plans;
- Corporations, Limited Liability Companies and/or Other Business Types.

We do not impose requirements for opening and maintaining accounts or otherwise engaging us.

Clients who custody their assets at Fidelity will not be charged transaction fees for U.S. listed equities and exchange traded funds if they opt into electronic delivery of statements or maintain at least \$1 million in assets at Fidelity.

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

Methods of Analysis

We may use the following methods of analysis in formulating our investment advice and/or managing client assets:

- Charting;
- Cyclical;
- Fundamental;
- Technical.

Investment Strategies We Use

We may use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

- Long Term Purchases (Securities Held At Least a Year);
- Short Term Purchases (Securities Sold Within a Year); and
- Trading (Securities Sold Within 30 Days).

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

Description of Material, Significant or Unusual Risks

We generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client's cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to Comprehensive Portfolio Management as applicable.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

In accordance with the express terms of the applicable trust and Minnesota Statutes chapter 501C, Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc., firms under common control with Midwest Financial Partners Investments, Inc. dba Midwest Financial Partners, will assist in the administration of trusts by acting as trustees. Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc. may be wholly or partly responsible for selecting an advisor, broker, or investment manager and any such advisor, broker, or investment manager may be affiliated with Midwest Financial Partners Family Office, Inc. and/or Midwest Financial Partners, Inc. Such affiliation, if any, shall not affect the duties and responsibilities of Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc. under its service agreement or any applicable law.

Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc. will serve as trustees, provide bill pay services, or act as agents on behalf of clients. Midwest Financial Partners Family Office, Inc. also provides tax preparation services. In order to avoid conflicts of interest, clients of Midwest Financial Partners Investments, Inc. dba Midwest Financial Partners are under no obligation to engage Midwest Financial Partners Family Office, Inc. or Midwest Financial Partners, Inc. for their services.

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

An investment adviser is considered a fiduciary and our firm has a fiduciary duty to all clients. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided upon request.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are

similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts¹. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates. Upon employment or affiliation and at least quarterly thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics.

Neither our firm nor a related person recommends to clients, or buys or sells for client accounts, securities in which our firm or a related person has a material financial interest. Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day. If related persons' accounts are included in a block trade, our related persons accounts will be traded in the same manner every time.

Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics.

Item 12: Brokerage Practices

Selecting a Brokerage Firm

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation
- Quality of services

¹ For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

With this in consideration, our firm has an arrangement with Pershing Advisor Solutions, LLC ("Pershing") and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which we are provided with "institutional platform services". Our firm is independently operated and owned and is not affiliated with Pershing or Fidelity. The institutional platform services include, among others, brokerage, custody, and other related services. Fidelity's institutional platform services that assist us in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Pershing and Fidelity may make certain research and brokerage services available at no additional cost to our firm all of which qualify for the safe harbor exemption defined in Section 28(e) of the Securities Exchange Act of 1934. These services may be directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by Pershing and Fidelity may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by Pershing to our firm in the performance of our investment decision-making responsibilities.

We do not use client brokerage commissions to obtain research or other products or services. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving these services, we may have an incentive to continue to use or expand the use of Pershing's and Fidelity's services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with Pershing and Fidelity. We have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

Pershing and Fidelity charge brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Pershing and Fidelity enable us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Pershing and Fidelity commission rates are generally discounted from customary retail commission rates. The commission and transaction fees charged by Pershing and Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

Our clients may pay a commission to Pershing or Fidelity that is higher than another qualified broker dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Soft Dollars

Although the investment research products and services that may be obtained by our firm will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. Our firm does not accept products or services that do not qualify for Safe Harbor outlined in Section 28(e) of the Securities Exchange Act of 1934, such as those services that do not aid in investment decision-making or trade execution.

Client Brokerage Commissions

Pershing and Fidelity do not make client brokerage commissions generated by client transactions available for our firm's use.

Procedures to Direct Client Transactions in Return for Soft Dollars

Our firm does not direct client transactions to a particular broker-dealer in return for soft dollar benefits.

Brokerage for Client Referrals

Our firm does not receive brokerage for client referrals.

Directed Brokerage

Neither we nor any of our firm's related persons have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are effected. We routinely recommend that a client directs us to execute through a specified broker-dealer. Our firm recommends the use of Pershing or Fidelity. Each client will be required to establish their account(s) with Pershing or Fidelity if not have not already done so. Please note that not all advisers have this requirement.

Permissibility of Client-Directed Brokerage

We do not allow client-directed brokerage outside our custodial recommendations.

Special Considerations for ERISA Clients

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

Aggregation of Purchase or Sale

We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13: Review of Accounts or Financial Plans

We review accounts on at least an annual basis for our clients subscribing to our Comprehensive Portfolio Management service. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Only our Financial Advisors will conduct reviews.

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

Retirement Plan Consulting clients receive reviews of their retirement plans for the duration of the retirement plan consulting service. We also provide ongoing services to Retirement Plan Consulting clients where we meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Retirement Plan Consulting clients do not receive written or verbal updated reports regarding their retirement plans unless they choose to contract with us for ongoing Retirement Plan Consulting services.

Item 14: Client Referrals & Other Compensation

Product Sponsors

Representatives of our firm will occasionally accept travel expense reimbursement provided by product sponsors in order to attend their educational events. The reimbursement is not directly dependent upon the recommendation of any specific product. Although we may be incentivized to recommend products from product sponsors that reimburse our travel, our representatives will always adhere to their fiduciary duty in recommending appropriate investments for our clients.

Referral Fees

Our firm does not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940.

Item 15: Custody

Trustee and Bill Paying Services:

Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc., firms under common control with Midwest Financial Partners Investments, Inc. dba Midwest Financial Partners, serve as trustees for one or more trusts, perform bill paying services for some clients, or act as agents on behalf of certain clients. As such, our firm will be deemed to have custody if such services are provided to our advisory clients. The client assets of which our firm has custody are verified by actual examination at least once during each calendar year by an independent public accountant registered with the Public Company Accounting Oversight Board, at a time that is chosen by the accountant without prior notice or announcement to our firm and that is irregular from year to year. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

Third Party Money Movement:

The SEC issued a no-action letter ("Letter") with respect to the Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instruction ("SLOA") is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with the account custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Clients have the option of providing our firm with investment discretion on their behalf, pursuant to an executed investment advisory client agreement. By granting investment discretion, we are authorized to execute securities transactions, which securities are bought and sold, and the total amount to be bought and sold. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm's written acknowledgement.

Item 17: Voting Client Securities

We do not accept proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Item 18: Financial Information

We are not required to provide financial information in this Brochure because we do not require the prepayment of more than \$1,200 in fees and six or more months in advance, and we do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients. Please see Item 15 for custody issues presented by our firm's outside business activities. We have never been the subject of a bankruptcy proceeding.

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Thomas D. St. Hilaire

Midwest Financial Partners
912 West St. Germain Street, Suite 300
Saint Cloud, MN 56301
www.mfpmn.com

Firm Contact:
Mark P. Boyle
Chief Compliance Officer

This brochure supplement provides information about Thomas D. St. Hilaire that supplements our brochure. You should have received a copy of that brochure. Please contact Mark P. Boyle if you did not receive Midwest Financial Partners Investments, Inc dba Midwest Financial Partners' brochure or if you have any questions about the contents of this supplement. Additional information about Thomas D. St. Hilaire is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 4446701.

Item 2: Educational Background & Business Experience

Thomas D. St. Hilaire

Year of Birth: 1974

Educational Background:

- 1996; Yale University: Bachelor of Arts in Ethics, Politics & Economics

Business Background:

- 12/2014 – Present Midwest Financial Partners Investments, Inc; President & Investment Advisor Representative
- 01/2013 – Present Midwest Financial Partners, Inc; President
- 09/2014 – 12/2019 VOYA Financial Advisors Inc.; Registered Representative
- 11/2008 – 12/2012 Mahowald Financial Partners; President
- 06/2005 – 08/2014 ING Financial Partners Inc.; Registered Representative
- 01/2004 – 06/2005 Factory Motor Parts; Director of Marketing

Exams, Licenses & Other Professional Designations:

- 2010: Chartered Financial Analyst (CFA)
- 2007: Certified Financial Planner (CFP®)
- 2007: Chartered Life Underwriter (CLU®)
- 2007: Chartered Financial Consultant (ChFC®)
- 2005: Life & Health Insurance Licensed
- 2005: Series 66 Exam
- 2002: Series 24 Exam
- 2001: Series 7 Exam

The CHARTERED FINANCIAL ANALYST (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute. The CFA is a professional designation that measures the competence and integrity of financial analysts. To qualify candidates must have four years of investment or financial career experience and hold a bachelors degree. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

CERTIFIED FINANCIAL PLANNER™ (CFP®) certification is obtained by completing an advanced college-level course of study addressing the financial planning subject areas that the CFP board's studies have determined as necessary for the competent and professional delivery of financial planning services, a comprehensive certification exam (administered in 10 hours over a 2 day period) and agreeing to be bound by the CFP board's standard of professional conduct. As a prerequisite the IAR must have a bachelor's degree from a regionally accredited United States college or university (or foreign university equivalent) and have at least 3 years of full time financial planning experience (or equivalent measured at 2,000 hours per year). This designation requires 30 hours of continuing education every 2 years and renewing an agreement to be bound by the standards of professional conduct.

Chartered Financial Consultant (ChFC®) designation is obtained by completing 6 core, 2 elective courses and a final exam for each course. As a prerequisite the IAR must have 3 years of full time business experience in these related fields: underwriting and management, financial services and employee benefits, client service, financial institution management or four year college degree, government regulatory service, or be an actuary, attorney, CPA, investment advisor, real estate investment advisor, stockbroker or trust officer. This designation requires 30 hours of continuing education every 2 years.

The CHARTERED LIFE UNDERWRITER (CLU®) is offered by The American College. To receive the CLU® designation, you must successfully complete all courses in your selected program, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures. Three years of full-time business experience is required for all Huebner School designations.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. St. Hilaire.

Item 4: Other Business Activities

Mr. St. Hilaire is a licensed insurance agent. He may offer insurance products and receive normal and customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation he and/or our supervised persons may earn.

Mr. St. Hilaire is the sole owner of Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc. In accordance with the express terms of the applicable trust and Minnesota Statutes chapter 501C, Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc., firms under common control with Midwest Financial Partners Investments, Inc. dba Midwest Financial Partners, will assist in the administration of trusts by acting as trustees. Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc. may be wholly or partly responsible for selecting an advisor, broker, or investment manager and any such advisor, broker, or investment manager may be affiliated with Midwest Financial Partners Family Office, Inc. and/or Midwest Financial Partners, Inc. Such affiliation, if any, shall not affect the duties and responsibilities of Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc. under its service agreement or any applicable law.

Midwest Financial Partners Family Office, Inc. and Midwest Financial Partners, Inc. will serve as trustees, provide bill pay services, or act as agents on behalf of clients. Midwest Financial Partners Family Office, Inc. also provides tax preparation services. In order to avoid conflicts of interest, clients of Midwest Financial Partners Investments, Inc. dba Midwest Financial Partners are under no obligation to engage Midwest Financial Partners Family Office, Inc. or Midwest Financial Partners, Inc. for their services.

Item 5: Additional Compensation

Mr. St. Hilaire does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Mark P. Boyle, Chief Compliance Officer of Midwest Financial Partners Investments, Inc, supervises and monitors Mr. St. Hilaire's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Boyle if you have any questions about Mr. St. Hilaire's brochure supplement at 320-251-3752.

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Hailey H. Hollenhorst
Midwest Financial Partners
912 West St. Germain Street, Suite 300
Saint Cloud, MN 56301
www.mfpmn.com

Firm Contact:
Mark P. Boyle
Chief Compliance Officer

This brochure supplement provides information about Hailey H. Hollenhorst that supplements our brochure. You should have received a copy of that brochure. Please contact Mr. Boyle if you did not receive Midwest Financial Partners Investments, Inc dba Midwest Financial Partners' brochure or if you have any questions about the contents of this supplement. Additional information about Hailey H. Hollenhorst is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD # 6794484.

Item 2: Educational Background & Business Experience

Hailey Harren Hollenhorst

Year of Birth: 1985

Educational Background:

- 2010: Loyola University of Chicago School of Law; Juris Doctorate
- 2007: Gustavus Adolphus College; Bachelor of Arts in Financial Economics & Political Science

Business Background:

- 05/2017 – Present Midwest Financial Partners Investments, Inc;
Investment Advisor Representative
- 10/2014 – 04/2017 Quarles & Brady LLP; Senior Associate
- 10/2010 – 10/2014 Gray, Plant, Mooty, Mooty & Bennett, P.A.; Associate

Exams, Licenses & Other Professional Designations:

- 07/2019 – Certified Financial Planner™ (CFP®)
- 07/2017 – Series 65
- 07/2017 – Accident & Health, Life

CERTIFIED FINANCIAL PLANNER™ (CFP®) certification is obtained by completing an advanced college-level course of study addressing the financial planning subject areas that the CFP board's studies have determined as necessary for the competent and professional delivery of financial planning services, a comprehensive certification exam (administered in 10 hours over a 2 day period) and agreeing to be bound by the CFP board's standard of professional conduct. As a prerequisite the IAR must have a bachelor's degree from a regionally accredited United States college or university (or foreign university equivalent) and have at least 3 years of full time financial planning experience (or equivalent measured at 2,000 hours per year). This designation requires 30 hours of continuing education every 2 years and renewing an agreement to be bound by the standards of professional conduct.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Ms. Hollenhorst.

Item 4: Other Business Activities

Ms. Hollenhorst is a non-practicing attorney in the State of Minnesota. Legal services are not offered through our firm. If a client requires legal services, they will be referred to a separate attorney. Our firm does not receive any additional compensation for client referrals.

Ms. Hollenhorst is a licensed insurance agent. She may offer insurance products and receive normal and customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation she and/or our supervised persons may earn.

Item 5: Additional Compensation

Ms. Hollenhorst does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Mark P. Boyle, Chief Compliance Officer of Midwest Financial Partners Investments, Inc, supervises and monitors Ms. Hollenhorst's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Boyle if you have any questions about Ms. Hollenhorst's brochure supplement at 320-251-3752.

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Jamie W. Schrupp

Midwest Financial Partners
912 West St. Germain Street, Suite 300
Saint Cloud, MN 56301
www.mfpmn.com

Firm Contact:
Mark P. Boyle
Chief Compliance Officer

This brochure supplement provides information about Jamie W. Schrupp that supplements our brochure. You should have received a copy of that brochure. Please contact Mr. Boyle if you did not receive Midwest Financial Partners Investments, Inc dba Midwest Financial Partners' brochure or if you have any questions about the contents of this supplement. Additional information about Jamie W. Schrupp is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD # 5916140.

Item 2: Educational Background & Business Experience

Jamie W. Schrupp
Year of Birth: 1974

Educational Background:

- 1997: University of North Dakota; Bachelor of Science in Engineering

Business Background:

- 12/2014 – Present Midwest Financial Partners Investments, Inc;
Investment Advisor Representative
- 09/2014 – 12/2017 VOYA Financial Advisors Inc.; Registered Representative
- 01/2013 – Present Midwest Financial Partners, Inc; Agent
- 04/2011 – 08/2014 ING Financial Partners Inc; Registered Representative
- 04/2011 – 12/2012 Mahowald Financial Partners; Agent
- 08/2003 – 04/2011 Target Corporation.; Manager

Exams, Licenses & Other Professional Designations:

- 2017: Certificate in Investment Performance Measurement (CIPM®)
- 2013: Chartered Financial Consultant (ChFC®)
- 2013: Chartered Life Underwriter (CLU®)
- 2013: Certified Financial Planner (CFP®)
- 2011: Series 7 & 66 Exams
- 2011: Life & Health Insurance Licensed

The Certificate in Investment Performance Measurement (CIPM®) is offered by the CFA Institute. To obtain the Certificate, one must sequentially pass two examinations (known respectively as Principles and Expert). The content of each of these examinations includes 13% on ethics and professional standards. A certain level of practical experience is also required before obtaining the certificate. After obtaining the Certificate, Certificate-holders are required to engage in continuing education, and to file a Professional Conduct Statement (PCS) annually. Misconduct can render a certificate-holder liable to professional discipline.

Chartered Financial Consultant (ChFC®) designation is obtained by completing 6 core, 2 elective courses and a final exam for each course. As a prerequisite the IAR must have 3 years of full time business experience in these related fields: underwriting and management, financial services and employee benefits, client service, financial institution management or four year college degree, government regulatory service, or be an actuary, attorney, CPA, investment advisor, real estate investment advisor, stockbroker or trust officer. This designation requires 30 hours of continuing education every 2 years.

The CHARTERED LIFE UNDERWRITER (CLU®) is offered by The American College. To receive the CLU® designation, you must successfully complete all courses in your selected program, meet experience requirements and ethics standards, and agree to comply with The American College Code of Ethics and Procedures. Three years of full-time business experience is required for all Huebner School designations.

CERTIFIED FINANCIAL PLANNER™ (CFP®) certification is obtained by completing an advanced college-level course of study addressing the financial planning subject areas that the CFP board's studies have

determined as necessary for the competent and professional delivery of financial planning services, a comprehensive certification exam (administered in 10 hours over a 2 day period) and agreeing to be bound by the CFP board's standard of professional conduct. As a prerequisite the IAR must have a bachelor's degree from a regionally accredited United States college or university (or foreign university equivalent) and have at least 3 years of full time financial planning experience (or equivalent measured at 2,000 hours per year). This designation requires 30 hours of continuing education every 2 years and renewing an agreement to be bound by the standards of professional conduct.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. Schrupp.

Item 4: Other Business Activities

Mr. Schrupp is a licensed insurance agent. He may offer insurance products and receive normal and customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation he and/or our supervised persons may earn.

Item 5: Additional Compensation

Mr. Schrupp does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Mark P. Boyle, Chief Compliance Officer of Midwest Financial Partners Investments, Inc, supervises and monitors Mr. Schrupp's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Boyle if you have any questions about Mr. Schrupp's brochure supplement at 320-251-3752.

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Mark P. Boyle

Midwest Financial Partners
912 West St. Germain Street, Suite 300
Saint Cloud, MN 56301
www.mfpmn.com

Firm Contact:
Mark P. Boyle
Chief Compliance Officer

This brochure supplement provides information about Mark P. Boyle that supplements our brochure. You should have received a copy of that brochure. Please contact Mark P. Boyle if you did not receive Midwest Financial Partners Investments, Inc dba Midwest Financial Partners' brochure or if you have any questions about the contents of this supplement. Additional information about Mark Boyle is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 6456667.

Item 2: Educational Background & Business Experience

Mark P. Boyle

Year of Birth: 1989

Educational Background:

- 2013: Saint Cloud State University; Bachelor of Arts in Economics
- 2010: Augsburg University
- 2009: University of Minnesota Duluth

Business Background:

- 02/2015 – Present Midwest Financial Partners Investments, Inc;
Chief Compliance Officer and Investment Advisor Representative
- 02/2015 – 12/2017 VOYA Financial Advisors Inc.; Registered Representative
- 09/2014 – 02/2015 KPMG; Consultant
- 03/2014 – 09/2014 Boom Lab; Consultant
- 07/2013 – 03/2014 Randstad; Contractor
- 08/2012 – 04/2013 Independent
- 05/2012 – 08/2012 Mahowald Insurance Agency; Intern
- 05/2010 – 05/2011 Helps International; Administrative Assistant

Exams, Licenses & Other Professional Designations:

- 09/2020: Series 65
- 01/2016: Series 24
- 10/2015: Series 66
- 08/2015: Series 7
- 04/2015: MN Life, Health, & Accident License

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. Boyle.

Item 4: Other Business Activities

Mr. Boyle is a licensed insurance agent. He may offer insurance products and receive normal and customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation he and/or our supervised persons may earn.

Item 5: Additional Compensation

Mr. Boyle does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Thomas D. St. Hilaire is a principal of Midwest Financial Partners Investments, Inc and as such supervises and monitors Mr. Boyle's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Thomas D. St. Hilaire if you have any questions about Mr. Boyle's brochure supplement at 320-251-3752.

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John D. Glomski

Midwest Financial Partners
912 West St. Germain Street, Suite 300
Saint Cloud, MN 56301
www.mfpmn.com

Firm Contact:
Mark P. Boyle
Chief Compliance Officer

This brochure supplement provides information about John D. Glomski that supplements our brochure. You should have received a copy of that brochure. Please contact Mark P. Boyle if you did not receive Midwest Financial Partners Investments, Inc dba Midwest Financial Partners' brochure or if you have any questions about the contents of this supplement. Additional information about John D. Glomski is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 5662134.

Item 2: Educational Background & Business Experience

John D. Glomski
Year of Birth: 1976

Educational Background:

- 2001: University of Minnesota Mankato; Master of Urban & Regional Studies
- 1998: Gustavus Adolphus College; Bachelor of Art in Geography

Business Background:

- 12/2014 – Present Midwest Financial Partners Investments, Inc;
Investment Advisor Representative
- 09/2014 – 12/2017 VOYA Financial Advisors Inc.; Registered Representative
- 01/2013 – Present Midwest Financial Partners, Inc; Agent
- 12/2009 – 08/2014 ING Financial Partners Inc.; Registered Representatives
- 03/2009 – 12/2012 Mahowald Financial Partners; Agent
- 10/2002 – 03/2009 Northwest Associated Consultants; City Planning Consultant

Exams, Licenses & Other Professional Designations:

- 2011: Accredited Investment Fiduciary (AIF®)
- 2010: Series 7, 63 & 65 Exams

The ACCREDITED INVESTMENT FIDUCIARY® (AIF®) designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To be eligible to receive the AIFA designation, individuals must have already completed the AIF training program and passed the AIF exam and meet a minimum prerequisite score based on the candidate's educational background and professional training and experience in investing, financial services and auditing. To receive the AIF® designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF® Code of Ethics. In order to maintain the AIF® designation, the individual must annually renew their affirmation of the AIF Code of Ethics and complete six hours of continuing education credits.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. Glomski.

Item 4: Other Business Activities

Mr. Glomski does not have any outside business activities to report.

Item 5: Additional Compensation

Mr. Glomski does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Mark P. Boyle, Chief Compliance Officer of Midwest Financial Partners Investments, Inc, supervises and monitors Mr. Glomski's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Boyle if you have any questions about Mr. Glomski's brochure supplement at 320-251-3752.

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Thomas W. St. Hilaire

Midwest Financial Partners
912 West St. Germain Street, Suite 300
Saint Cloud, MN 56301
www.mfpmn.com

Firm Contact:
Mark P. Boyle
Chief Compliance Officer

This brochure supplement provides information about Thomas W. St. Hilaire that supplements our brochure. You should have received a copy of that brochure. Please contact Mark P. Boyle if you did not receive Midwest Financial Partners Investments, Inc dba Midwest Financial Partners' brochure or if you have any questions about the contents of this supplement. Additional information about Thomas W. St. Hilaire is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 806477.

Item 2: Educational Background & Business Experience

Thomas W. St. Hilaire

Year of Birth: 1947

Educational Background:

- 2018: Arizona State University; Bachelor of Arts

Business Background:

- 12/2014 – Present Midwest Financial Partners Investments, Inc;
Investment Advisor Representative
- 09/2014 – 12/2017 VOYA Financial Advisors Inc.; Registered Representative
- 01/2013 – Present Midwest Financial Partners, Inc; Agent
- 01/1985 – Present Guardian Life Insurance Company of America; Agent
- 01/1985 – Present Northwestern National Life Insurance Company; Agent
- 07/1982 – Present UNUM Insurance Company; Agent
- 06/1981 – Present Travelers Insurance Company; Agent
- 01/2004 – 08/2014 ING Financial Partners Inc.; Registered Representative
- 11/2008 – 12/2012 Mahowald Financial Partners; Agent

Exams, Licenses & Other Professional Designations:

- 2012: Series 7 Exam
- 2007: Series 65 Exam
- 2000: Series 26 Exam
- 1991: Series 63 Exam
- 1975: Series 1 Exam
- 1974: Life & Health Insurance Licensed

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. St. Hilaire.

Item 4: Other Business Activities

Mr. St. Hilaire is a licensed insurance agent. He may offer insurance products and receive normal and customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation he and/or our supervised persons may earn.

Item 5: Additional Compensation

Mr. St. Hilaire does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Mark P. Boyle, Chief Compliance Officer of Midwest Financial Partners Investments, Inc, supervises and monitors Thomas W. St. Hilaire's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Boyle if you have any questions about Thomas W. St. Hilaire's brochure supplement at 320-251-3752.

Midwest Financial Partners Investments, Inc.

PRIVACY NOTICE

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Midwest Financial Partners Investments, Inc.

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. Midwest Financial Partners Investments, Inc. does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at Midwest Financial Partners Investments, Inc. except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To consumer reporting agencies,
- To third parties who perform services or marketing on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or Midwest Financial Partners Investments, Inc.;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Midwest Financial Partners Investments, Inc. does not receive information regarding marketing eligibility from affiliates to make solicitations.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect potential red-flags to prevent and mitigate identity theft.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Thomas D. St. Hilaire at Midwest Financial Partners Investments, Inc., 912 W. St. Germain Street, Suite 300, St. Cloud, MN 56301; (320) 251-3752.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Midwest Financial Partners Investments, Inc., 912 W. St. Germain Street, Suite 300, St. Cloud, MN 56301; (320) 251-3752.