

Form CRS – Client Relationship Summary

Hartley Advisors Corporation

September 30, 2025

Hartley Advisors Corporation (“we,” “us,” or “our”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about investment advisers, brokers, and financial professionals.

What investment services and advice can you provide me?

We offer investment management services to individuals, families and businesses. Our services include ongoing monitoring of your investments and providing advice based on your objectives, risk tolerance, and time horizon. We also help small and medium-sized businesses manage their company retirement plans. We do not offer proprietary products or commission-based investments. Our minimum account size is \$500,000.

For additional information, please see our Form ADV, Part 2A (Items 4 and 7) at adviserinfo.sec.gov/firm/summary/.

Conversation Starters:

- 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 these qualifications mean?

What fees will I pay?

We are a fee-only adviser. Our fees are typically based on a percentage of assets under management (“AUM”), billed quarterly in advance. Fees are negotiable depending on the scope and complexity of services. Because our fees are based on AUM, we may have an incentive to encourage you to increase your assets managed by us. You may also pay custodian fees, account maintenance fees, and other investment-related expenses. We do not receive commissions or revenue sharing from any investment providers.

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.

For more detailed information, please see our Form ADV, Part 2A (Item 5).

Conversation Starters:

- Help me understand how these fees and costs might 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?

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 creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you.

For example, since our fees are based on the value of assets under management, we have an incentive to encourage you to invest more assets with us.

Conversation Starters:

- 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 a percentage of the advisory fees collected from clients. They do not receive commissions or other compensation based on specific products recommended or sales made.

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

No. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starters:

- As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

For more information about our services, please see our Form ADV, Part 2A on the SEC's website at adviserinfo.sec.gov. You may also contact us for a free copy of this relationship summary or other up-to-date information about us.

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