

**Hanlon Investment Management, Inc.**  
**Form CRS – Customer Relationship Summary**  
**June 3, 2021**

**Introduction**

Hanlon Investment Management, Inc. (“Hanlon” or the “Firm”) is registered with the SEC as an Investment Adviser. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment adviser, and investing. Brokerage and investment advisory services and fees differ, and it is important for the retail investor to understand the differences.

**What investment services and advice can you provide me?**

Hanlon provides investment advisory and investment management services to clients. These services are primarily offered through its Managed Account Platform (“Platform”). Through the Platform, Hanlon provides clients with access to several its own proprietary model portfolios and those of third-party investment managers. The minimum account size is \$50,000 but Hanlon may accept clients with less than the minimum portfolio size if Hanlon believes the smaller portfolio size will not cause a substantial increase of investment risk beyond the client’s identified risk tolerance. In addition to offering services through its Platform, Hanlon’s services could include financial planning.

Hanlon has full discretion when a client invests in a model portfolio. This means that Hanlon may purchase and sell securities for your account without having to obtain your permission. When a client invests in securities that are not a part of a model portfolio, the client will inform Hanlon whether the client is granting Hanlon with discretion over those securities.

Hanlon monitors clients’ portfolios as part of an ongoing process with account reviews conducted periodically. Such reviews consist of system-generated reports identifying client portfolios that may be out of tolerance for the model allocation selected.

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 about our services, please see our Form ADV, Part 2A brochure (Items 4 and 7 of Part 2A or Items 4.A and 5.A., B., C., and D. of Part 2A Appendix 1).

- **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?**

Hanlon provides investment management services for an annual fee that is charged quarterly based upon a percentage of the market value of the clients’ assets being managed by Hanlon. Generally, Hanlon’s fee will not exceed 1.80% per annum. Some accounts could be higher but will not exceed 2.20%. If the client account was introduced to Hanlon by a Co-Adviser or Solicitor, Hanlon will share a portion of their fee with the Co-Adviser or Solicitor’s firm pursuant to an agreement between Hanlon and the firm. Depending on the account type the client opens at the third-party custodian, the custodian may charge the client transaction fees for certain transactions.

Mutual funds, ETFs and alternative investments charge their own fees for investing the pool of assets in the

respective investment vehicles. In addition, third-party model managers may charge the client a separate fee ranging from 0.0% to 0.35% but may be higher and will be disclosed to the client at the time of account opening.

Clients will pay fees and costs whether they make or lose money on their investments. Fees and costs will reduce any amount of money clients make on their investments over time. Clients need to make sure they understand what fees and costs they are paying.

**Conversation Starter** *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? 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 creates some conflicts with your interests. You should understand and ask us about these conflicts because they affect the recommendations, we provide you. Here are some examples to help you understand what this means.

Because Hanlon bases its advisory fee on the value of the client's account, the more assets there are in a client's account, the more a retail investor will pay in fees, and Hanlon may therefore have an incentive to encourage their clients to increase the assets in their account.

Hanlon provides investment management services through its affiliated mutual funds, the Hanlon Tactical Dividend and Momentum Fund ("TDM") and the Hanlon Managed Income Fund ("MI"). Both the TDM and MI Funds may be a part of the underlying holdings of some of Hanlon's proprietary model portfolios. Hanlon earns fees for providing investment advisory services to its clients in addition to investment management fees charged by the TDM and MI funds.

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

**How do your financial professionals make money?**

The investment adviser servicing client accounts receives a portion of the advisory fee paid to Hanlon. The portion of the advisory fee shared with your financial professional is determined by an agreement between Hanlon and your investment adviser.

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

Yes. For more detailed information, visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to review firms and financial professionals.

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

**Additional Information**

For additional information about our services, please refer to Hanlon's ADV. To receive an up-to-date Form CRS, please contact Hanlon's Compliance Department at (609) 601-1200.

**Conversation Starter** *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?*