

HCA Fee and Conflict of Interest Disclosure

William N. Hudson, III, the President and principal owner of Hudson Capital Advisory, Inc., is an investment adviser representative and minority shareholder with Hudson Advisor Services, Inc., an SEC-registered investment adviser (“Hudson Advisor Services”). Therefore, certain clients of Hudson Capital may also be clients of Hudson Advisor Service which presents a conflict of interest. In order to mitigate this conflict, Hudson Capital will ensure that under no circumstances will a client account be charged a fee by more than one advisory firm. However, clients may have an account for which Hudson Capital receives a fee and have other accounts for which Hudson Advisor Services receives a fee. Hudson Capital has a conflict when Hudson Advisor Services clients invest in Hudson Capital portfolio strategies that have or may have higher fees than Hudson Advisor Services fees. In addition, Hudson Capital has a conflict when a client becomes a direct client of Hudson Capital as the firm receives a direct management fee from the client.

Hudson Capital serves as a sub-advisor to other registered investment advisory firms, and this creates a conflict as the advisor resources are applied to these services in addition to direct Hudson Capital clients.

William N. Hudson III serves as trustee to the Loan Deposit Master Trust for the Buffalo Bill, LLC Tax Lien program. He is not compensated but does have added duties to this role.

Please note that certain separate account portfolios have a higher management fee than other strategies at HCA. This creates a conflict of interest both Hudson Capital Advisory, Inc. Currently the following separate account portfolios have higher management fees:

- HCA Earnings Growth Portfolio (1.95%)
- HCA Healthcare Opportunities Portfolio (1.50%)

The normal management fee for HCA balanced portfolio is 1% per annum.

Please call or email us with any questions. 617-820-4014 or bhudson3@invest-hca.com