# Hudson Portfolio Management LLC June 29, 2020 FORM CRS

Hudson Portfolio Management LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at <a href="Investor.gov/CRS">Investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

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

We offer the two investment advisory services to retail investors: Portfolio Management Services and Investment Consulting Services. Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, 13 and 16 by clicking this link <a href="https://adviserinfo.sec.gov/firm/brochure/130021">https://adviserinfo.sec.gov/firm/brochure/130021</a>

**Account Monitoring:** If you open an investment account with our firm, as part of our standard service we will monitor your investments on a continual basis. Security prices are monitored daily, as are deposits, withdrawals and security trades. Managed portfolios are monitored at least monthly, as are the investments. Most portfolios are reviewed at least quarterly. Most funds and securities within our portfolios are reviewed at least monthly.

<u>Investment Authority</u>: We manage investment accounts on a *discretionary* basis. This means **we** *will decide* which investments to buy or sell for your account. If you wish to limit which securities we purchase (e.g., no coal companies) or sell, we need to review those restrictions with you before you want those restrictions to apply or before the portfolio is first set-up. On rare occasions we separately offer *non-discretionary* investment consulting services where we will provide investment advice, but *do not buy or sell any investments on your behalf*. Under this arrangement you have no obligation to follow our consulting advice.

<u>Investment Offerings:</u> For the portfolios we manage, we invest in a broad range of marketable securities, included listed securities and NAV funds. These include equity, fixed-income and money market securities; open funds, closed-end funds, trust and partnerships that are traded on exchanges; mutual funds that settle on a net asset value (NAV) at the end of day; and money market funds and bank deposits that have fixed values. We do not invest in private placements. None of our investments carry front-end loads or sales commissions.

Account Minimums and Requirements: We do not require a minimum dollar amount to open and maintain a managed portfolio, but we do have a minimum fee, which is indicative of an account of at least \$400,000. We may temporarily waive the minimum on new accounts that are expected to grow over time or that are part of a bigger (e.g., family) relationship.

#### **Key Questions to Ask Your Financial Professional**

- 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?

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A by clicking this link https://adviserinfo.sec.gov/firm/brochure/130021

- Asset Based Fees Payable quarterly in advance on the portfolios we manage, calculated as a percentage of the market value at the close of each calendar quarter.
- Hourly and Fixed Fees Payable as invoiced for the investment consulting service we occasionally provide.

In additional to our management fee, your investments may be subject to other fees and costs:

- · Management and operating fees charged by various mutual, exchange-traded and money market funds
- Broker commissions charged on the purchase or sale of funds or individual securities.
- Broker custodian and account maintenance fees.

Taxes and fees charged on some overseas investments.

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.

# **Key Questions to Ask Your Financial Professional**

 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 can affect the investment advice we provide you. Since our management fees are based solely upon the size of your portfolio, we have incentives to encourage you to add money to your portfolio and to transfer other accounts or investments to our management. Similarly, we have an incentive to discourage you from withdrawing money from your portfolio. We also have an incentive to make investments that will appreciate over time rather than maintain a stable value. Our affiliate, Hudson Financial Group, Inc., though compensated on a time basis (i.e., hourly billing), may have an indirect incentive to make similar recommendations, for example, by suggesting that refunds from the tax returns HFG prepares be deposited into your portfolio, or that a mortgage be used rather than withdrawing the funds from the portfolio to purchase a home. (To see more about how we make money refer to Form ADV Part 2A by clicking this link: <a href="https://adviserinfo.sec.gov/firm/brochure/130021">https://adviserinfo.sec.gov/firm/brochure/130021</a>

## **Key Questions to Ask Your Financial Professional**

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

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

The financial professional servicing your account(s) are compensated in the following ways: Base salary and an annual bonus based on both the company earnings and the performance of the individual. There are no commission-like payments based upon the size of accounts being managed or serviced or new business generated.

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

No, our firm and our financial professionals currently do not have and have never had any legal or disciplinary history to disclose. Visit Investor.gov/CRS for a free and simple research tool.

## **Key Questions to Ask Your Financial Professional**

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 845-424-4567 or click the link provided <a href="https://adviserinfo.sec.gov/firm/brochure/130021">https://adviserinfo.sec.gov/firm/brochure/130021</a>

### **Key Questions to Ask Your Financial Professional**

- 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?