



**DISCLOSURE
DOCUMENTS**

FORM ADV
Part II - Page 1 **Uniform Application for Investment Adviser Registration**

Name of Investment Adviser:						
Hudson Capital Management LLC						
Address: (Number and Street)		(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
141 Dayton Street, Suite 206		Ridgewood	NJ	07450	(201)	389-3192

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any governmental authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

**Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.**

Applicant: Hudson Capital Management LLC	SEC File Number: 801- <input type="text"/>	Date: 03/06/2009
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1. A. Advisory Services and Fees. (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

<input checked="" type="checkbox"/> (1) Provides investment supervisory services	<input type="text" value="95"/> %
<input type="checkbox"/> (2) Manages investment advisory accounts not involving investment supervisory services	<input type="text"/> %
<input checked="" type="checkbox"/> (3) Furnishes investment advice through consultations not included in either service described above	<input type="text" value="5"/> %
<input type="checkbox"/> (4) Issues periodicals about securities by subscription	<input type="text"/> %
<input type="checkbox"/> (5) Issues special reports about securities not included in any service described above	<input type="text"/> %
<input type="checkbox"/> (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities	<input type="text"/> %
<input type="checkbox"/> (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	<input type="text"/> %
<input type="checkbox"/> (8) Provides a timing service	<input type="text"/> %
<input type="checkbox"/> (9) Furnishes advice about securities in any manner not described above	<input type="text"/> %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? Yes No

C. Applicant offers investment advisory services for: (check all that apply)

<input checked="" type="checkbox"/> (1) A percentage of assets under management	<input type="checkbox"/> (4) Subscription fees
<input checked="" type="checkbox"/> (2) Hourly charges	<input type="checkbox"/> (5) Commissions
<input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees)	<input type="checkbox"/> (6) Other

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients — Applicant generally provides investment advice to: (check those that apply)

<input checked="" type="checkbox"/> A. Individuals	<input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations
<input type="checkbox"/> B. Banks or thrift institutions	<input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above
<input type="checkbox"/> C. Investment companies	<input type="checkbox"/> G. Other (describe on Schedule F)
<input checked="" type="checkbox"/> D. Pension and profit sharing plans	

Applicant:	Hudson Capital Management LLC	SEC File Number:	801-	Date:	03/06/2009
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3. **Types of Investments.** Applicant offers advice on the following: (check those that apply)

<p>A. Equity securities</p> <p><input checked="" type="checkbox"/> (1) exchange-listed securities</p> <p><input checked="" type="checkbox"/> (2) securities traded over-the-counter</p> <p><input checked="" type="checkbox"/> (3) foreign issuers</p> <p><input checked="" type="checkbox"/> B. Warrants</p> <p><input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper)</p> <p><input type="checkbox"/> D. Commercial paper</p> <p><input checked="" type="checkbox"/> E. Certificates of deposit</p> <p><input checked="" type="checkbox"/> F. Municipal securities</p> <p>G. Investment company securities:</p> <p><input checked="" type="checkbox"/> (1) variable life insurance</p> <p><input checked="" type="checkbox"/> (2) variable annuities</p> <p><input checked="" type="checkbox"/> (3) mutual fund shares</p>	<p><input checked="" type="checkbox"/> H. United States government securities</p> <p>I. Options contracts on:</p> <p><input checked="" type="checkbox"/> (1) securities</p> <p><input type="checkbox"/> (2) commodities</p> <p>J. Futures contracts on:</p> <p><input type="checkbox"/> (1) tangibles</p> <p><input type="checkbox"/> (2) intangibles</p> <p>K. Interests in partnerships investing in:</p> <p><input checked="" type="checkbox"/> (1) real estate</p> <p><input checked="" type="checkbox"/> (2) oil and gas interests</p> <p><input checked="" type="checkbox"/> (3) other (explain on Schedule F)</p> <p><input type="checkbox"/> L. Other (explain on Schedule F)</p>
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4. **Methods of Analysis, Sources of Information, and Investment Strategies.**

A. Applicant's security analysis methods include: (check those that apply)

(1) <input type="checkbox"/> Charting	(4) <input type="checkbox"/> Cyclical
(2) <input checked="" type="checkbox"/> Fundamental	(5) <input type="checkbox"/> Other (explain on Schedule F)
(3) <input type="checkbox"/> Technical	

B. The main sources of information applicant uses include: (check those that apply)

(1) <input checked="" type="checkbox"/> Financial newspapers and magazines	(5) <input type="checkbox"/> Timing services
(2) <input checked="" type="checkbox"/> Inspections of corporate activities	(6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission
(3) <input checked="" type="checkbox"/> Research materials prepared by others	(7) <input checked="" type="checkbox"/> Company press releases
(4) <input checked="" type="checkbox"/> Corporate rating services	(8) <input type="checkbox"/> Other (explain on Schedule F)

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

(1) <input checked="" type="checkbox"/> Long term purchases (securities held at least a year)	(5) <input checked="" type="checkbox"/> Margin transactions
(2) <input checked="" type="checkbox"/> Short term purchases (securities sold within a year)	(6) <input type="checkbox"/> Option writing, including covered options, uncovered options, or spreading strategies
(3) <input type="checkbox"/> Trading (securities sold within 30 days)	(7) <input type="checkbox"/> Other (explain on Schedule F)
(4) <input type="checkbox"/> Short sales	

Applicant: <input type="text" value="Hudson Capital Management LLC"/>	SEC File Number: 801- <input type="text"/>	Date: <input type="text" value="03/06/2009"/>
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5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
(If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

• name	• formal education after high school
• year of birth	• business background for the preceding five years

7. Other Business Activities. (check those that apply)

A. Applicant is actively engaged in a business other than giving investment advice.

B. Applicant sells products or services other than investment advice to clients.

C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

A. Applicant is registered (or has an application pending) as a securities broker-dealer.

B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.

C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

<input type="checkbox"/> (1) broker-dealer	<input type="checkbox"/> (7) accounting firm
<input type="checkbox"/> (2) investment company	<input type="checkbox"/> (8) law firm
<input type="checkbox"/> (3) other investment adviser	<input type="checkbox"/> (9) insurance company or agency
<input type="checkbox"/> (4) financial planning firm	<input type="checkbox"/> (10) pension consultant
<input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant	<input type="checkbox"/> (11) real estate broker or dealer
<input type="checkbox"/> (6) banking or thrift institution	<input type="checkbox"/> (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes No
(If yes, describe on Schedule F the partnerships and what they invest in.)

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9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

10. Conditions for Managing Accounts. Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other conditions for starting or maintaining an account? Yes No

(If yes, describe on Schedule F.)

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

While the underlying securities within Portfolio Management client accounts are continuously monitored, Timothy Parker, Portfolio Manager of Hudson Capital Management (hereinafter HCM), will formally review these accounts at least quarterly. More frequent reviews may be triggered by variables such as the client's individual circumstances, or the market, political or economic environment.

Financial Planning/Consulting client accounts will be reviewed as contracted for at the inception of the advisory relationship.

All clients are advised that it remains their responsibility to advise HCM of any changes in their investment objectives and/or financial situation. All clients (in person or telephonically) are encouraged to review financial planning issues, investment objectives and account performance with HCM on at least an annual basis.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

Portfolio Management clients will receive monthly or quarterly statements and confirmation of transactions from Fidelity Brokerage Services, Inc., the broker dealer with whom clients are required to direct HCM to place trades.

HCM will not provide regular reports to Financial Planning or Consulting clients. However, HCM expects to provide reports on the portfolio at least annually as part of regular reviews with clients.

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12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(2) amount of the securities to be bought or sold?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(3) broker or dealer to be used?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(4) commission rates paid?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

B. Does applicant or a related person suggest brokers to clients? Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? Yes No

B. directly or indirectly compensates any person for client referrals? Yes No

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? Yes No

Schedule F of Form ADV Continuation Sheet for Form ADV Part II	Applicant: Hudson Capital Management LLC	SEC File Number:	Date: 09/21/2009
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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Hudson Capital Management LLC	IRS Empl. Ident. No.: 20-0827986
Item of Form (Identify)	Answer

1.D	<p>PORTFOLIO MANAGEMENT:</p> <p>Hudson Capital Management LLC (hereinafter HCM) provides Investment Supervisory Services, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, HCM develops a client's personal investment policy and creates and manages a portfolio based on that policy. HCM may provide this service to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations. HCM manages advisory accounts on a discretionary basis only. Account supervision is guided by the stated objectives of the client.</p> <p>HCM will create a portfolio consisting of one or all of the following: individual equities, bonds, other investment products, no-load and load-waived mutual funds. HCM will allocate the client's assets among various investments taking into consideration the overall objectives selected by the client. The mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.</p> <p>In performing its services, HCM shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify HCM if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising HCM's previous recommendations and/or services.</p> <p>FINANCIAL PLANNING:</p> <p>HCM also provides advice in the form of a Financial Plan. Clients purchasing this service will receive a written report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.</p> <p>In general, the financial plan will address any or all of the following areas of concern:</p> <ul style="list-style-type: none"> - PERSONAL: Family records, budgeting, personal liability, estate information and financial goals. - TAX & CASH FLOW: Income tax and spending analysis and planning for past,
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Schedule F of Form ADV Continuation Sheet for Form ADV Part II	Applicant: Hudson Capital Management LLC	SEC File Number:	Date: 09/21/2009
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I. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Hudson Capital Management LLC	IRS Empl. Ident. No.: 20-0827986
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Item of Form (Identify)	Answer
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	<p>current and future years.</p> <p>HCM may illustrate the impact of various investments on a client's current income tax and future tax liability.</p> <ul style="list-style-type: none"> - DEATH & DISABILITY: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis. - RETIREMENT: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals. - INVESTMENTS: Analysis of investment alternatives and their effect on a client's portfolio. <p>HCM gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations contained in the plan, HCM suggests the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.</p> <p>Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.</p> <p>In performing its services, HCM shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. If requested by the client, HCM may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. Clients are encouraged to renew HCM's financial planning services on an annual basis for the purpose of reviewing/updating HCM's previous recommendations and/or services. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify HCM if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising HCM's previous recommendations and/or services.</p> <p>CONSULTING:</p> <p>Clients can also receive investment advice on a more limited basis. This may include advice on only an isolated area(s) of concern such as estate planning, retirement planning, reviewing a client's existing portfolio, or any other specific</p>
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	<p>topic. HCM also provides specific consultation and administrative services regarding investment and financial concerns of the client.</p> <p>Additionally, HCM provides advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance, and/or annuity advice.</p> <p><u>FEE SCHEDULE</u></p> <p>PORTFOLIO MANAGEMENT SERVICES:</p> <p>The annual fee for portfolio management services will be charged as a percentage of assets under management, according to the following schedule:</p> <table border="0"> <thead> <tr> <th style="text-align: left;"><u>Assets under management</u></th> <th style="text-align: left;"><u>Annual Fee (%)</u></th> </tr> </thead> <tbody> <tr> <td>Up to \$3 million</td> <td>1.10%</td> </tr> <tr> <td>\$3 million and above</td> <td>0.70%</td> </tr> </tbody> </table> <p>Client accounts will be charged in arrears on the first business day following the end of the calendar quarter. Fees for new accounts of existing clients will be charged on the same schedule as existing accounts. Fees will be calculated based upon the value (market value or fair market value in the absence of market value) of the client's assets under management at the end of the period just ended. HCM requires a minimum annual advisory fee of \$8,250 for Portfolio Management clients.</p> <p>However, HCM will ensure that this never exceeds 3% of a client's managed assets for any given year.</p> <p><u>Direct Debiting of Client Accounts:</u></p> <p>Advisory fees may be directly debited from a client account (without HCM being deemed to have 'custody') if the following conditions are met:</p> <ol style="list-style-type: none"> 1. If the client provides written authorization permitting the adviser's fees to be paid directly from the client's account held by an independent custodian. 2. The adviser sends to the client and the custodian at the same time, a bill showing the amount of the fee, the value of the client's assets on which the fee was based, and the specific manner in which the adviser's fee was calculated. 3. The custodian agrees to send to the client a statement, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the adviser. 	<u>Assets under management</u>	<u>Annual Fee (%)</u>	Up to \$3 million	1.10%	\$3 million and above	0.70%
<u>Assets under management</u>	<u>Annual Fee (%)</u>						
Up to \$3 million	1.10%						
\$3 million and above	0.70%						

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	<p>FINANCIAL PLANNING:</p> <p>Financial planning fees will be charged on an hourly basis of \$250/hour. An estimate for total hours will be determined at the start of the advisory relationship, and a deposit from the client of \$1,000 will be required before work begins. Clients will be invoiced every three months for the fees then due, or upon completion of the project, whichever comes first. All financial planning fees are due and payable upon receipt of invoice.</p> <p>CONSULTING:</p> <p>Fees for specific administrative and consulting services will be billed one or both of two ways:</p> <ol style="list-style-type: none"> 1. At an hourly rate of \$250 per hour. An estimate for total hours will be determined at the start of the consulting project, and a deposit from the client of \$1,000 will be required before work begins. Clients will be invoiced every three months for the fees then due, or upon completion of the project, whichever comes first. 2. As a fixed fee. A deposit from the client of one-half the fee will be required before work begins. Final payment shall be due and payable on completion of the work. <p><u>GENERAL INFORMATION ON FEES AND SERVICES</u></p> <p><u>Negotiability of Fees:</u> In certain circumstances, HCM's fees may be negotiable.</p> <p><u>Fee Calculation:</u> The fee charged is calculated as described above and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client (Section 205(a)(1) of the Investment Advisers Act of 1940, as amended).</p> <p><u>Termination of Advisory Relationship:</u> A client agreement may be canceled at any time, by either party, for any reason upon receipt of five days prior written notice. Upon termination of any relationship, any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.</p> <p><u>Mutual Fund Fees and Expenses:</u> All fees paid to HCM for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund</p>
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	<p>expenses, and a possible distribution fee. A client could invest in a mutual fund directly, without the services of HCM. In that case, the client would not receive the services provided by HCM which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by HCM to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.</p> <p><u>Mutual Fund Risks:</u> Before investing in mutual funds, clients should understand that mutual funds may not be insured by the FDIC, NCUSIF, or any other federal government agency and are not deposits or obligations of, guaranteed by, or insured by, the depository institution where offered or any of its affiliates. Mutual funds involve investment risk and may lose value.</p> <p><u>Transactions Fees and Expenses:</u> HCM does not receive any portion of any transaction fee or expenses paid by clients to other service providers. Any transaction fee or expense, including commissions for trading stocks will be borne by the clients.</p> <p><u>Proxies:</u> As a matter of firm policy, HCM does not vote proxies on behalf of clients. Clients are responsible for voting their own proxies. However, HCM may provide clients with consulting assistance regarding proxy issues.</p> <p><u>Privacy Policy:</u> HCM does not disclose any non-public, personal information (such as name, address or tax identification number) about its clients or former clients to anyone except as necessary to perform its duties, as permitted by applicable law or required by regulation. HCM maintains physical safeguards to protect such unauthorized disclosure and will notify clients of its policies and practices in this regard on an annual basis or at any time at which there is a material change in its policies which would require their consent.</p> <p>HCM does not sell customer lists and has no affiliated companies. Even if you are no longer a client of HCM, our Privacy Policy will continue to apply to you. To conduct regular business, HCM may collect non-public personal information from sources such as: (a) information provided by you on applications or other forms you provide to us; and/or (b) information about your investment and securities transactions.</p> <p><u>Disclosure Document:</u> A copy of HCM's written disclosure statement as set forth on Part II of HCM's Form ADV will be provided to each client prior to or contemporaneously with the execution of the Financial Planning Contract or the Investment Management Contract. Any client who has not received a copy of this HCM's written disclosure statement at least forty-eight (48) hours prior to executing</p>
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	<p>the Financial Planning Contract or the Investment Management Contract shall have five (5) business days subsequent to executing the agreement to terminate HCM's services without penalty.</p> <p>Neither HCM nor the client may assign the Financial Planning Contract or the Investment Management Contract without the prior written consent of the other party. Transactions that do not result in a change of actual control or management of HCM shall not be considered an assignment.</p>
3.K(3)	<p><u>TYPES OF INVESTMENTS</u></p> <p>Investment advice may also be provided on investments such as hedge funds.</p> <p>Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments will typically be limited to those items checked under Item 3 of Form ADV, Part II.</p>
5	<p><u>EDUCATION AND BUSINESS STANDARDS</u></p> <p>Advisory persons associated with HCM must possess, minimally, the following: A college degree and/or appropriate business experience and all required licenses or professional designations.</p>
6	<p><u>EDUCATION AND BUSINESS BACKGROUND</u></p> <p>TIMOTHY G. PARKER Born: 1966</p> <p><u>Education:</u></p> <p>Graduated from San Diego State University in 1989 with a B.S. in Business Administration with an emphasis in Financial Services.</p> <p><u>Employment:</u></p> <p>Vice President of The Bank of New York from 8/98 to 8/04. President of Hudson Capital Management LLC from 03/04 to Present. Portfolio Manager of Hudson Capital Management LLC from 03/04 to Present.</p> <p><u>Designations:</u></p> <p>Chartered Financial Analyst (CFA) - 2001</p>

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	<p>VICTORIA K. PARKER Born: 1966</p> <p><u>Education:</u></p> <p>Graduated from Towson State University in 1989 with a B.A. in Business.</p> <p><u>Employment:</u></p> <p>Home Economist from 2/98 to Present. Member of Hudson Capital Management LLC from 03/04 to Present.</p>
9.E.	<p><u>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS</u></p> <p><u>Investment Policy:</u> None of HCM's advisory representatives may effect for himself or herself or for his or her immediate family (i.e., spouse, minor children) (collectively "Covered Persons") any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of HCM's clients, unless in accordance with the following Firm Procedures.</p> <p><u>Firm Procedures:</u> In order to implement HCM's investment policy, the following procedures have been put into place with respect to HCM and its Covered Persons:</p> <ol style="list-style-type: none"> 1. If HCM is purchasing or considering for purchase any security on behalf of HCM's client, no Covered Persons may transact in that security prior to the client purchase having been completed by HCM, or until a decision has been made not to purchase the security on behalf of the client; and 2. If HCM is selling or considering the sale of any security on behalf of HCM's client, no Covered Persons may transact in that security prior to the sale on behalf of the client having been completed by HCM, or until a decision has been made not to sell the security on behalf of the client. <p><u>Exceptions</u></p> <ol style="list-style-type: none"> 1. This investment policy has been established recognizing that some securities being considered for purchase and sale on behalf of HCM's clients trade in sufficiently broad markets to permit transactions to be completed without any appreciable impact on the markets of the securities. Under certain circumstances exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with HCM's records. 2. Open-end mutual funds and/or the investment subdivisions which may comprise a variable insurance product are purchased or redeemed at a fixed net asset

Schedule F of Form ADV Continuation Sheet for Form ADV Part II	Applicant: Hudson Capital Management LLC	SEC File Number:	Date: 09/21/2009
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I. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Hudson Capital Management LLC	IRS Empl. Ident. No.: 20-0827986
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	<p>value price per share specific to the date of purchase or redemption. As such, transactions in mutual funds and/or variable insurance products by Covered Persons are not likely to have an impact on the prices of the fund shares in which clients invest, and are therefore not prohibited by HCM's Investment Policy and Procedures.</p> <p>In accordance with Section 204A of the Investment Advisers Act of 1940, HCM also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by HCM or any person associated with HCM.</p> <p>HCM has established, maintains and enforces a written code of ethics that includes the Code of Ethics and Standards of Professional Conduct as published by the CFA Institute, and is supplemented by our own Insider Trading Policy. A copy of our code of ethics is available upon request of a client or prospective client.</p>
10	<p><u>CONDITIONS FOR MANAGING AN ACCOUNT</u></p> <p>HCM requires a minimum annual advisory fee of \$8,250 for Portfolio Management clients. However, HCM will ensure that this never exceeds 3% of a client's managed assets for any given year.</p>
12.A.(1) & 12.A.(2)	<p><u>INVESTMENT DISCRETION</u></p> <p>For discretionary clients, HCM receives authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be in a separate written statement. Clients may change/amend these limitations as required.</p>
12.B	<p><u>BROKERAGE RECOMMENDATIONS</u></p> <p>PORTFOLIO MANAGEMENT:</p> <p>HCM participates in the Fidelity Institutional Wealth Services ('IWS') program, sponsored by Fidelity Brokerage Services, Inc. ('Fidelity'), an NASD registered broker-dealer. As HCM does not have the discretion to choose the broker-dealer or the commission rates to be paid, clients must direct the use of a particular broker-dealer. HCM requires that clients direct HCM to place all trades through Fidelity. HCM has evaluated Fidelity and believes that Fidelity will provide HCM clients with a blend of execution services, commission costs and professionalism that will assist HCM in obtaining best execution for transactions. While HCM has a reasonable belief that Fidelity is able to obtain best execution and competitive prices, HCM will not be independently seeking best execution price capability through other broker-dealers.</p>

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	<p>HCM reserves the right to decline acceptance of any client account that directs the use of a broker-dealer other than Fidelity, if HCM believes that this would adversely affect HCM's duty to obtain best execution. 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. Factors which HCM considers in recommending Fidelity to clients include financial strength, reputation, execution, pricing, research, and service.</p> <p>Fidelity enables HCM to obtain many no-load mutual funds without transaction charges and other no-load and load waived funds at nominal transaction charges. Broker-dealers and custodians, including Fidelity generally charge commission rates which are generally considered discounted from customary retail commission rates. The commissions and/or transaction fees charged by Fidelity may be higher or lower than those charged by other broker-dealers. HCM will not receive any portion of the brokerage commissions and/or transactions fees charged to fee-only clients. The brokerage commissions and/or transaction fees charged by Fidelity are exclusive of, and in addition to, HCM's investment advisory fee.</p> <p>In directing the use of Fidelity, it should be understood that HCM will not have authority to negotiate commissions, obtain volume discounts and best execution may not be achieved. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to other clients.</p> <p>HCM may combine ("block") trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple clients' accounts. Block trading allows HCM to execute equity trades in a timelier, equitable manner to clients. However, no personal trades will ever be included in any client blocks.</p> <p>FINANCIAL PLANNING/CONSULTING:</p> <p>Financial Planning and/or Consulting clients will be required to select their own broker-dealers and insurance companies for the implementation of financial planning recommendations. HCM may recommend any one of several brokers. HCM clients must independently evaluate these brokers before opening an account. The factors considered by HCM when making this recommendation are the broker's ability to provide professional services, HCM's experience with the broker, the broker's reputation, and the broker's financial strength, among other factors. HCM's financial planning and consulting clients may use any broker or dealer of their choice.</p>
13.A	<p><u>ADDITIONAL COMPENSATION</u></p> <p>Although not a material consideration when determining whether to recommend that a</p>

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	client utilize the services of a particular broker-dealer/custodian, HCM may receive from Fidelity, without cost (and/or at a discount) support services and/or products, which assist HCM to better monitor and service client accounts maintained at a particular broker-dealer/custodian.
13.B	<p><u>ADDITIONAL COMPENSATION</u></p> <p>HCM may from time to time compensate, either directly or indirectly, any person (defined as a natural person or a company) for client referrals. HCM is aware of the special considerations promulgated under Section 206(4)-3 of the Investment Advisers Act of 1940 and similar state regulations. As such, appropriate disclosure shall be made, all written instruments will be maintained by HCM and all applicable Federal and/or State laws will be observed.</p>