

## **Wrap Fee Program Brochure**

### **Form ADV 2A - Appendix 1**

#### **Item 1 - Cover Page**

## **HBK Wealth Management**

**CRD# 168419**

9360 Montgomery Road  
Cincinnati, Ohio 45242

(513) 942-9700

[www.HBKWealthManagement.com](http://www.HBKWealthManagement.com)

**June 1, 2015**

This wrap fee program brochure provides information about the qualifications and business practices of HBK Wealth Management. If you have any questions about the contents of this brochure, please contact us at (513)-942-9700 or [joshua.haire@lpl.com](mailto:joshua.haire@lpl.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

HBK Wealth Management is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about HBK Wealth Management is also available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

#### **Item 2 - Material Changes**

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our annual update was filed on February 11, 2015. Of course the complete Brochure is available to clients at any time upon request.

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#### ***Item 4 - Services, Fees and Compensation***

HBK Wealth Management ("HBK") was registered as an investment adviser with the Securities and Exchange Commission in 2013 and provides financial planning and portfolio management services to its clients. Such services are offered through the "HBK Wealth Wrap Program" or the "Program", which has been designed to simplify the payment of management fees and brokerage expenses.

As of December 31, 2014, HBK managed \$305,243,571 assets on a discretionary basis, and no assets on a non-discretionary basis.

David B. Haire is the sole principal owner of HBK. Please see ***Brochure Supplements***, Exhibit A, for more information on Mr. Haire and other individuals who formulate investment advice and have direct contact with clients, or have discretionary authority over client accounts.

#### **General Information**

At the beginning of a client relationship, HBK meets with the client, gathers information, and performs research and analysis as necessary. Based on its reviews, HBK generally develops with each client:

- a financial outline for the client based on the client's financial circumstances and goals, and the client's risk tolerance level (the "Financial Profile"); and
- the client's investment objectives and guidelines (the "Investment Plan").

The Financial Profile is a reflection of the client's current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments HBK will make on behalf of the client in order to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by HBK based on updates to the client's financial or other circumstances.

#### **Financial Planning**

HBK offers limited financial planning services to those clients in need of such service in conjunction with Portfolio Management services. HBK's limited financial planning services normally address areas such as general cash flow planning, retirement planning, and insurance analysis. The goal of this service is to assess the financial circumstances of the client in order to more effectively develop the client's Investment Plan. Financial planning is not offered as a stand-alone service or for a separate fee, but is typically provided in conjunction with the management of the portfolio.

#### **Portfolio Management**

To implement the client's Investment Plan, HBK will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, HBK will have the authority to supervise and direct the portfolio without prior consultation with the client. The HBK Wealth Wrap Program does not currently include any outside managers.

Notwithstanding the foregoing, clients may impose certain written restrictions on HBK in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of HBK.

### **General Fee Information**

Fees paid by clients to participate in the HBK Wealth Wrap Program include brokerage expenses (i.e., commissions, ticket charges, etc.) as well as the management fee paid to HBK. Please see ***Item 6 - Portfolio Manager Selection and Evaluation*** for additional information. Under the all-inclusive billing alternative, HBK will assess one client fee that captures the management, brokerage and administrative portions collectively. The standard rate schedule is set forth below.

Fees paid to HBK are exclusive of and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). Clients will pay certain fees in addition to the fees of the HBK Wealth Wrap Program, as more fully described below.

The client should review all fees charged by funds, HBK and others to fully understand the total amount of fees paid by the client for investment and financial-related services. Clients participating in the HBK Wealth Wrap Program may pay higher or lower fees than clients purchasing such services separately, depending on the cost of services if provided separately and the level of trading in a particular client's account.

### **Wrap Fee Program Fees**

HBK's annual fee for investment management services provided under this Agreement shall be based on the market value of the assets under management in each account and be calculated as follows:

<u>Assets Under Management</u>	<u>Annual Rate</u>
\$0 - \$99,999	1.40%
\$100,000 - \$249,999	1.30%
\$250,000- \$499,999	1.20%
\$500,000 - \$999,999	1.10%
\$1,000,000 - \$2,499,999	1.00%
\$Over \$2,500,000	0.90%

The above fees are negotiable and charged quarterly in advance. Clients may incur additional charges for other account services that are not directly related to the execution and clearing of transactions, including, but not limited to, IRA custodial fees, safekeeping fees, interest charges on margin loans, and fees for transfers of securities. If management begins after the start of a quarter,

fees will be prorated accordingly. With client authorization and unless other arrangements are made, fees are normally debited directly from client account(s).

Either HBK or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to HBK from the client will be invoiced or deducted from the client's account prior to termination.

### **Other Compensation**

Certain of HBK's employees are also Registered Representatives of LPL Financial ("LPL"), a FINRA and SIPC member, and registered broker/dealer. As such, they are entitled to receive commissions or other remuneration on the sale of insurance and other products. To protect client interests, HBK's policy is to fully disclose all forms of compensation before any such transaction is executed. Clients will not pay both a commission to these individuals and also pay an advisory fee to HBK on assets held in the same account. These fees are exclusive of each other. As a result of this relationship, LPL may have access to certain confidential information (i.e., financial information, investment objectives, transactions, and holdings) about HBK clients, even if the client does not establish any account through LPL. If you would like a copy of the LPL privacy notice, please contact Josh Haire.

### ***Item 5 – Account Requirements and Types of Clients***

The HBK Wealth Wrap Program is generally offered to individuals, pension and profit-sharing plans, corporations, trusts, estates and charitable organizations. HBK does not generally impose a minimum portfolio value for conventional investment advisory services or a minimum fee.

### ***Item 6 – Portfolio Manager Selection and Evaluation***

The HBK Wrap Program was designed to simplify for clients the payment of management fees and brokerage expenses. The Program does not select advisers in addition to HBK, which is the only Portfolio Manager for the Program.

### **Performance-Based Fees and Side-By-Side Management**

HBK does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because HBK has no performance-based fee accounts, it has no side-by-side management.

### **Methods of Analysis**

HBK primarily invests in Mutual Funds, ETFs, Individual Stocks, Individual Bonds, Fixed Income Securities, and alternative investments.

ETFs and Mutual Funds will be evaluated and selected based on a variety of factors, including, without limitation: past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and return, and other factors.

Fixed Income Investments will be used as a strategic investment to fulfill liquidity and income needs in a portfolio, or to add a component of capital preservation. HBK may evaluate and select individual bonds or bond funds based on a number of factors, including, without limitation, rating, yield, and duration.

In making selections of individual stocks for client portfolios, HBK focuses on the following types of analysis:

*Fundamental*: Involves reviewing the business and financial information about an issuer; without limitation, the following factors will be considered:

- Financial Strength Ratios
- Price-to-earnings ratios
- Dividend yields; and
- Growth rate to price to earnings ratios

*Technical*: involves studying past price patterns and trends in the financial market to predict the direction of both the overall market and specific stocks.

*Charting*: involves gathering and processing price and volume information for a particular security. HBK's charting analysis normally includes, without limitation:

- Mathematical analysis;
- Graphing charts, and estimations of future price movements based on perceived patterns and trends

*Cyclical Analysis* – is a type of technical analysis that involves evaluating recurring price patterns and trends.

### **Investment Strategies**

From accumulation to distribution, HBK's strategic approach is to invest portfolios in accordance with the Plan that has been developed specifically for each client, designing individual portfolios based on the client's unique circumstances. Generally, HBK is a long-term investor and typically develops a client portfolio based on the client's stage of life.

Clients will be placed in a general model that will be customized according to risk tolerance, time horizon, size of portfolio, and other factors that will vary from client to client. Although two clients may be in the same overall portfolio model, each portfolio will differ based on each client's situation.

The following strategies may be used in varying combinations over time for a given client, depending upon the client's individual circumstances.

*Long Term Purchases* – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

*Margin Transactions* – a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

*Options Trading/Writing*: a securities transaction that involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to

purchase or deliver a specified number of shares at a specified price at the exercise of the option regardless of the market value of the security at expiration of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option.

### **Risk of Loss**

While HBK seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

*Management Risks.* While HBK manages client investment portfolios based on HBK's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that HBK allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that HBK's specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, HBK may invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Risks Related to Alternative Investment Vehicles.* The value of client portfolios will be based in part on the value of alternative investment vehicles in which they are invested, the success of each of which will depend heavily upon the efforts of their respective Managers. When the investment objectives and strategies of a Manager are out of favor in the market or a Manager makes unsuccessful investment decisions, the alternative investment vehicles managed by the Manager may lose money. A client account may lose a substantial percentage of its value if the investment objectives and strategies of many or most of the alternative investment vehicles in which it is invested are out of favor at the same time, or many or most of the Managers make unsuccessful investment decisions at the same time.

*Equity Market Risks.* HBK will generally invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (i.e., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* HBK may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* HBK may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

*Derivatives Risk:* HBK may, for certain clients that qualify as “accredited investors” and for whom it is appropriate, invest portions of the client assets in Private Placement Funds that invest in derivative financial instruments (“derivatives”) including, without limitation, futures, options, interest rate swaps, forward currency contracts and credit derivatives such as credit default swaps. A small investment in derivatives could have a potentially large impact on an investor's performance. The use of derivatives involves risks different from, or possibly greater than, the risks associated with investing directly in the underlying assets. These risks include: (1) counterparty risk; (2) interest rate risk; (3) basis risk; (4) settlement risk; (5) legal risk; (6) operational risk; and (7) market risk. Counterparty risk is the risk that one of the Fund's counterparties might default on its obligation to pay or perform generally on its obligations. Interest rate risk is the general risk associated with movements in interest rates. Basis risk is the risk associated with the relative movements in two (related) rates or prices. Settlement risk is the risk that a settlement in a transfer system does not take place as expected. Legal risk is the risk that a transaction proves unenforceable in law or because it has been inadequately documented. Operational risk is the risk of unexpected losses arising from deficiencies in a firm's management information, support and control systems and procedures. Market risk is the risk of potential adverse changes in the value of financial instruments resulting from changes in market prices, such as interest, commodity and currency rate movements. In addition, derivatives can be highly volatile, illiquid and difficult to value.

### **Voting Client Securities**

As a policy and in accordance with HBK's client agreement, HBK does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact HBK with questions relating to proxy procedures and proposals; however, HBK generally does not research particular proxy proposals.

### **Best Execution and Benefits of Brokerage Selection**

When given discretion to select the brokerage firm that will execute orders in client accounts, HBK seeks “best execution” for client trades, which is a combination of a number of factors, including,



without limitation, quality of execution, services provided and commission rates. Therefore, HBK may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of HBK's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

HBK participates in the ***LPL Strategic Wealth Management Custodial Platform II*** ("LPL"). While there is no direct link between the investment advice HBK provides and participation in the LPL program, HBK receives certain economic benefits from the LPL program. These benefits may include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research, pricing information and other market data, facilitates the payment of HBK's fees from its clients' accounts, and assists with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of HBK's accounts, potentially including accounts not held at LPL. LPL may also make available to HBK other services intended to help HBK manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, LPL may make available, arrange and/or pay for these types of services to be rendered to HBK by independent third parties. LPL may discount or waive fees it would otherwise charge for some of these services, pay all or a part of the fees of a third-party providing these services to HBK, and/or LPL may pay for travel expenses relating to participation in such training. Finally, participation in the LPL program provides HBK with access to mutual funds which normally require significantly higher minimum initial investments or are normally available only to institutional investors.

The benefits received through participation in the LPL program do not necessarily depend upon the proportion of transactions directed to LPL. The benefits are received by HBK, in part because of commission revenue generated for LPL by HBK's clients. This means that the investment activity in client accounts is beneficial to HBK, because LPL does not assess a fee to HBK for these services. This creates an incentive for HBK to continue to recommend LPL to its clients. While it may be possible to obtain similar custodial, execution and other services elsewhere at a lower cost, HBK believes that LPL provides an excellent combination of these services. These services are not soft dollar arrangements, but are part of the institutional platform offered by LPL.

### **Directed Brokerage**

HBK does not generally allow directed brokerage accounts.

### **Aggregated Trade Policy**

HBK may enter trades as a block where possible and when advantageous to clients whose accounts have a need to buy or sell shares of the same security. This method permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. It allows HBK to execute trades in a timely, equitable manner, and may reduce overall costs to clients.

HBK will only aggregate transactions when it believes that aggregation is consistent with its duty to seek best execution (which includes the duty to seek best price) for its clients, and is consistent with the terms of HBK's Investment Advisory Agreement with each client for which trades are

being aggregated. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all HBK's transactions in a given security on a given business day. Transaction costs for participating accounts will be assessed at the custodian's commission rate applicable to each account; therefore, transaction costs may vary among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other factors making the account's participation ineligible or impractical.

HBK will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those clients. If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement. If the order is partially filled, it will generally be allocated pro-rata, based on the Allocation Statement, or randomly in certain circumstances. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved by an appropriate individual/officer of HBK. HBK's books and records will separately reflect, for each client account included in a block trade, the securities held by and bought and sold for that account. Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the transaction on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement, and HBK will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation.

### **Custody**

LPL is the custodian of all client accounts at HBK. It is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify HBK of any questions or concerns. Clients are also asked to promptly notify HBK if the custodian fails to provide statements on each account held.

From time to time and in accordance with HBK's agreement with clients, HBK will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting, pending trades or other similar issues.

### **Investment Discretion**

As described in ***Item 4 - Services, Fees and Compensation***, HBK manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, HBK will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving HBK the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client, and the withdrawal of advisory fees directly from the account. HBK then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with HBK and the requirements of the

client's custodian. The discretionary relationship is further described in the agreement between HBK and the client.

***Item 7 - Client Information Provided to Portfolio Managers***

HBK is the only portfolio manager under the HBK Wealth Wrap Program. No information is shared with any other portfolio manager.

***Item 8 - Client Contact with Portfolio Managers***

HBK is the only portfolio manager under the HBK Wealth Wrap Program. No restrictions are placed on client's ability to contact or consult with HBK.

***Item 9 - Additional Information***

**Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of HBK or the integrity of HBK's management. HBK has no disciplinary events to report.

**Other Financial Industry Activities and Affiliations**

Neither HBK nor its Management Persons have any other financial industry activities or affiliations to report.

**Code of Ethics and Personal Trading**

HBK has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. HBK's Code has several goals. First, the Code is designed to assist HBK in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, HBK owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with HBK (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for HBK's associated persons. Under the Code's Professional Standards, HBK expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, HBK associated persons are not to take inappropriate advantage of their positions in relation to HBK clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time HBK's associated persons may invest in the same securities recommended to clients. Under its Code, HBK has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

## **Participation or Interest in Client Transactions**

Because associated persons may invest in the same securities as those held in client accounts, HBK has established a policy requiring its associated persons to pre-clear transactions in certain of these securities with the Chief Compliance Officer. The goal of this policy is to avoid any conflict of interest that may present itself in these situations. Some types of securities, such as CDs, treasury obligations and open-end mutual funds are exempt from this pre-clearance requirement. However, in the event of other identified potential trading conflicts of interest, HBK's goal is to place client interests first.

Consistent with the foregoing, HBK maintains policies regarding participation in initial public offerings (IPOs) and private placements to comply with applicable laws and avoid conflicts with client transactions.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with HBK's written policy.

## **Review of Accounts**

Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by HBK. These factors may include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. One or more Investment Adviser Representatives and/or a firm principal review all accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, HBK provides at least a quarterly report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client

## **Client Referrals and Other Compensation**

As noted above, HBK may receive an economic benefit from LPL in the form of support products and services it makes available to HBK and other independent investment advisors that have their clients maintain accounts at LPL. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 6 - Portfolio Manager Selection and Evaluation***. The availability of LPL's products and services to HBK is based solely on our participation in the program, and not on the provision of any particular investment advice. Neither LPL nor any other party is paid to refer clients to HBK.

### **Financial Information**

HBK does not require nor solicit prepayment of more \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.