

**Part 2A of Form ADV: Firm Brochure**

**Item 1 Cover Page**

**Hedges Asset Management LLC**

2669 Rodney Drive

Reno, NV 89509

This brochure (the “**Brochure**”) provides information about the qualifications and business practices of Hedges Asset Management LLC. If you have any questions about the contents of this brochure, please contact us at (775) 843-2069 and/or [hedgesassetmanagementllc@gmail.com](mailto:hedgesassetmanagementllc@gmail.com)

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“**SEC**”) or by any state securities authority. Additional information about Hedges Asset Management LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm’s CRD number is 313637.

Hedges Asset Management LLC’s registration as an investment adviser does not imply a certain level of skill or training.

**Version date: 01/16/2024**

## **Item 2 Material Changes**

### **Summary of Material Changes**

This section will be updated as required in the event any material changes are made to the Hedges Asset Management LLC Firm Brochure

The material changes in this brochure from the last annual updating amendment of Hedges Asset Management LLC on 02/07/2023 are described below. Material changes relate to Hedges Asset Management LLC's policies, practices or conflicts of interests.

- Hedges Asset Management LLC updated its client types in Item 7.

### **Delivery Requirements**

We will provide a summary of any material changes to this Brochure to our clients at least annually, within 120 days of our fiscal year end. Furthermore, we will provide our clients with other interim disclosures about material changes as necessary.

A complete copy of our current Form ADV Part 2A and/or 2B may be requested free of charge by contacting us by telephone at (775) 843-2069 or by email at [hedgesassetmanagementllc@gmail.com](mailto:hedgesassetmanagementllc@gmail.com).

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## Item 4 Advisory Business

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### FIRM DESCRIPTION

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Hedges Asset Management LLC (hereinafter referred to as “*Hedges Asset Management*,” “*we*,” “*us*,” “*the Firm*,” or “*our Firm*”) is a Nevada limited liability company with its principal office located in Reno, Nevada. The principal owner and Chief Compliance Officer of Hedges Asset Management is William Hedges.

As a registered investment adviser, we are a fiduciary to you, our client, meaning we have a fundamental obligation to act and provide investment advice that is in your best interest. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you in this Brochure. We urge you to review this Brochure carefully and consider our qualifications, business practices and the nature of our advisory services before becoming our client.

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### ADVISORY PROGRAMS

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Hedges Asset Management provides investment management services to our clients. In connection with our investment management services, Hedges Asset Management provides advice with respect to stocks, bonds, mutual fund, municipal securities, U.S. Treasuries, options, limited partnerships, and certificates of deposits.

Hedges Asset Management’s advisory services are tailored to the needs of our clients based on their individual investment objectives, risk tolerance, cash or income needs, and any investment restrictions. Although Hedges Asset Management seeks to accommodate any reasonable investment restrictions or guidelines set by our clients, we may decline to accommodate certain investment restrictions that are incompatible with our Firms’ investment philosophy or that may have an adverse effect on our ability to manage your account.

Investors considering rolling over assets from a qualified employer-sponsored retirement plan (“Employer Plan”) to an Individual Retirement Account (“IRA”) should review and consider the advantages and disadvantages of an IRA rollover from their Employer Plan. A plan participant leaving an employer typically has four options (and may engage in a combination of these options): (1) Leave the money in the former employer’s plan, if permitted; (2) Rollover the assets to a new employer’s plan (if available and rollovers are permitted); (3) Rollover Employer Plan assets to an IRA; or (4) Cash out the Employer Plan assets and pay the required taxes on the distribution. At a minimum, Investors should consider fees and expenses, investment options, services, penalty-free withdrawals, protection from creditors and legal judgments, required minimum distributions, and employer stock. Hedges Asset Management encourages you to discuss your options and review the above-listed considerations with an accountant, third-party administrator, investment advisor to your Employer Plan (if available), or legal counsel, to the extent you consider necessary. By recommending that you rollover your Employer Plan assets to an IRA, Hedges Asset Management may earn asset-based fees as a result. In contrast, leaving assets in your Employer Plan or rolling the assets to a plan sponsored by your new employer likely results in little or no

compensation to Hedges Asset Management. Hedges Asset Management has an economic incentive to encourage investors to rollover Employer Plan assets into an IRA managed by Hedges Asset Management. Investors may face increased fees when they move retirement assets from an Employer Plan to a rollover IRA account.

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's investment guidelines, we will maintain quarterly contact with our clients in terms of portfolio construction, transactions and performance.

Hedges Asset Management enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory services (the "Investment Management Agreement"). The Investment Management Agreement sets forth the scope of the services to be provided and the compensation we receive from the client for such services. The Investment Management Agreement may be terminated by either party in writing at any time by giving thirty (30) days signed written notice to the other party.

Our advisors offer the advisory service described below to our clients:

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#### ASSETS UNDER MANAGEMENT

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As of December 2023, Hedges Asset Management managed \$ 169,900,000.00 on discretionary basis on Asset Under Management.

### Item 5 Fees and Compensation

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#### ADVISORY FEES

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The following information describes how Hedges Asset Management is compensated for the services we provide to our clients. The specific manner in which fees are charged and the compensation we receive may differ between clients depending upon the individual Investment Management Agreement with each client. We may charge higher or lower fees than are available from other Firms for comparable services. Fees may be subject to negotiation under certain circumstances as agreed on by the Firm and the client.

**Investment Management Fees.** In consideration for providing investment management services and pursuant to the terms of the Investment Management Agreement with the client, Hedges Asset Management charges clients an annualized asset-based fee based on the client's assets under management ("AUM"), taken quarterly in advance according to the following fee schedule:

Fee Breakdown	
Assets Under Management	Fee %
First \$100,000,000	0.75

Next \$100,000,000	0.5
Above \$500,000,000	0.4

Clients must authorize the deduction of advisory fees from their managed accounts by the qualified custodian. Hedges Asset Management does not withdraw fees directly from client's accounts. All fees will be supported by an invoice to the client itemizing the fee.

**Additional Fees and Expenses.** Clients will incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer through which account transactions are executed. For more information on our brokerage practices, please refer to Item 12 - Brokerage Practices of this Brochure.

The fees that clients pay to our Firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund's prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses. Hedges Asset Management does not receive any portion of the fees and expenses charged by mutual funds and/or exchange traded funds.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by their custodian, our Firm, broker/dealers, mutual funds, exchange traded funds, private funds, and others, and the tax implications of any investment strategy.

**Termination.** Investment Management Agreements with our clients may generally be terminated by either party upon thirty (30) days' written notice. Upon termination of our status as the client's investment adviser, Hedges Asset Management will not take any further action with respect to the client's account(s). Clients will be responsible for instructing their custodian and monitoring their account for the final disposition of assets.

Hedges Asset Management bills clients quarterly in advance. Terminating clients receive a refund for unearned fees. The Firm determines the amount to be refunded to the client, if any, by subtracting its fees earned as of the time of termination from any amounts collected in advance as of the time of termination.

**Brokerage Commissions.** Hedges Asset Management does not receive brokerage commissions from the sale of securities or other investment products. Our compensation for recommending securities and investment products is limited to the advisory fees described above.

**ERISA Accounts:** Hedges Asset Management is deemed to be a fiduciary to any advisory clients that have individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"). As such, our Firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, our Firm may only charge fees for investment advice about products for which our Firm and/or our related persons do not receive any

commissions or 12b-1 fees, or conversely, investment advice about products for which our Firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset our Firm's advisory fees.

Any material conflicts of interest between clients and Hedges Asset Management or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, Hedges Asset Management will provide our clients with written notification of those material conflicts of interest or an updated Brochure.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

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### **PERFORMANCE BASED FEES**

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Hedges Asset Management does not charge a performance-based fees, and therefore, we do not engage in side-by-side management.

## **Item 7 Types of Clients**

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### **TYPES OF CLIENTS**

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Hedges Asset Management offers investment advisory services to high net worth individuals and limited partnerships. Client relationships may vary in scope and length of service.

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### **ACCOUNT REQUIREMENTS**

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Hedges Asset Management requires a minimum account balance of \$25,000. Hedges Asset Management will aggregate accounts that originate from the same household when assessing the minimum account balance. However, Hedges Asset Management, in its sole discretion may waive or lower our base fee based on various criteria (i.e., anticipated future additional assets to be managed, related accounts, account composition, negotiations with the client, etc.).

## **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

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### **METHODS OF ANALYSIS**

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The Firm employs fundamental analysis using data to evaluate a security's intrinsic value. For example, fundamental analysis of a bond's value could involve evaluating economic factors including interest rates, the current state of the economy, and information about the bond issuer's credit ratings. Fundamental analysis of a stock takes into account revenues, earnings, future growth, return on equity, profit margins and other data to evaluate a company's value and its potential for future growth.

Research may be drawn from sources including financial publications, investment analysis and reporting software, inspections of corporate activities, research materials from outside sources,

corporate rating services, annual reports, prospectuses and other regulatory filings, as well as company press releases.

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## INVESTMENT STRATEGIES

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Portfolios will use a combination of stocks, bonds, and cash for potential maximization of return vs risk. Higher risk profile accounts will contain a higher percentage of stocks ranging from 30-100% of account value. Bonds will range between 0-60%. Cash range 0-60%. Lower risk profile accounts will have higher allocation toward bonds/cash.

The general investment allocation will be based on overall market outlook and potential risk adjusted returns. The 3-month Treasury bill and 10-year Treasury note will be benchmarks for calculation of asset mix. Other factors, but not all inclusive, include sentiment, technical factors, potential for discovery, diversification, and potential return.

Portfolios generally will hold 10-40 positions across industry groups, purchased individually. Industries can be over weighted, but generally not above 20% of the S&P 500 industry benchmarks.

Average holding period will be approximately 3 years, with the goal of recognizing long-term capital gain vs. short-term holdings. Securities purchased and sold will generally occur over time and not as a single purchase or sale. Purchases are based on the long-term risk adjusted outlook determined by the Firm. A company considered to be less risky will have a lower potential return hurdle than a higher risk item.

Sales of securities generally occur because of a change in outlook, market acceptance, or significant deterioration of financial strength.

Sales will occur as price targets are achieved or if conditions require raising of funds for new purchases, including diversification.

Accounts will be invested toward a longer-term view, but short-term factors can be considered.

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## RISK OF LOSS

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Investment returns are not guaranteed, and our clients may lose money on their investments. We ask that our clients work with the portfolio manager to help understand the clients' tolerance for risk. Our securities analysis and investment strategy methods rely, where possible and as appropriate, on credit ratings prepared by independent rating agencies and on financial statements audited by independent public auditors. We assume that rating agencies and auditors are in fact, independent and that they perform their services in accordance with applicable legal and professional standards. In addition, we rely on company management, investment banks, and attorneys to make accurate and unbiased representations about these securities in public filings and other publicly available information. We believe this data has been obtained from sources believed to be reliable and is accurate to the best of our knowledge. However, we recognize that some data may be incorrect, and there is always a risk that our analysis will be compromised by inaccurate

Hedges Asset Management LLC



or misleading information or that unanticipated circumstances will lead to unanticipated adverse results. Risks of loss may also arise from unanticipated circumstances.

The investment risks described below may not be all-inclusive but should be considered carefully:

**Business Risks:** The companies identified for investment face a wide variety of operational risks, including competitive threats, regulatory changes, execution challenges, and responses to external changes. For businesses listed on US exchanges, the Securities and Exchange Commission requires companies to disclose the most significant risk factors that could impact the business. However, these disclosures could be incomplete or inaccurate. An assessment of the relevant risk factors for any business could be incomplete or inaccurate. Both unforeseen and known risk factors may transpire, resulting in a deterioration of corporate performance.

**Cash Management Risks:** Hedges Asset Management may invest temporarily in money market funds or other similar types of investments, during which time a client may be prevented from achieving its investment objective.

**Corporate Securities:** Equity and debt securities (stocks and bonds) represent partial ownership interests in companies and partial claims on their assets, respectively. The value of these interests and claims is theoretically dependent upon the performance of the underlying business and the cash flows generated by its operations. However, securities prices may fluctuate independently of these factors due to market factors or for no reason at all. Prices may not change as expected even when the prospects of the business have been correctly assessed.

**Cybersecurity:** The increasing reliance on internet-based programs and applications to communicate, conduct transactions and store data creates increased security risks. Targeted cyber-attacks, or accidental events, can lead to a breach in computer and data systems and access by unauthorized persons to sensitive transactional or personal information. Data taken in breaches may be used by criminals to commit identity theft, obtain loans or payments under false identities, and other crimes. Cybersecurity breaches at our Firm or our service providers or counterparties may directly or indirectly affect clients, and could lead to theft, data corruption, interference with business operations, disruption of operational systems, interference with our Firm's ability to provide services, direct financial loss or reputational damage, or violations of applicable laws related to data and privacy protection.

**Dependence on Key Personnel:** Hedges Asset Management is a small investment manager, and we rely on certain key personnel who may become unable to fulfill certain duties.

**Equities Risk:** Equity securities can decline in value over short or extended periods as a result of changes in a company's financial condition and in overall market, economic and political conditions.

**Inflation Risk:** Rising inflation reduces the purchasing power of the underlying currency, which is the dollar for U.S. based investments. This also applies to foreign investments, which may be denominated in other currencies.

**Interest-Rate Risk:** Changes in interest rates may result in fluctuations in the prices of other investment vehicles. For example, when interest rates rise, fixed income securities prices fall.

**Interim Underperformance:** The long-term and concentrated nature of a strategy means that even if the strategy is “working properly” and the analysis is correct and leads to profitable realized outcomes, clients may experience multi-year periods of significant underperformance relative to market indexes and other investment strategies. This interim underperformance poses a significant risk of permanent capital loss for clients with short time horizons or who require withdrawals from their account.

**Legal, Legislative and Taxation Risk:** Business legal and regulatory regimes around the world continue to evolve. Legislative and regulatory changes or court rulings may adversely impact the value of investments, or the securities’ claim on the issuer’s assets and finances, or adversely affect our ability to conduct activities and transactions on your behalf. In addition, such changes may require adjustments to our operations or those of issuers or our clients or may result in increased costs and burdens related to client accounts. As regulations continue to change, we cannot always predict the effects that any new or changed regulations will have on our ability to invest in different markets or instruments on behalf of our clients. In addition, the rules dealing with taxation are constantly under review, resulting in revisions of resolutions and revised interpretations of established concepts as well as changes in law. Therefore, no assurance can be given that the currently anticipated income tax treatment of an investment will not be modified by legislative, judicial or administrative changes, possibly with retroactive effect, to the detriment of a client portfolio.

**Liquidity Risk:** Liquidity is the ability to convert an investment into cash. Investment assets are usually more liquid when established markets exist to trade those securities. In case of extreme market activity, it may not be possible to promptly liquidate certain assets. Also, sales of thinly traded securities could depress the market value of those securities and reduce the investments’ profitability or increase its losses.

**Market Risk:** Security prices may decrease due in response to direct and indirect events and market conditions, usually caused by factors independent of the specific attributes of the investment security.

**Model Risks:** Models may be deficient in their design. Human and technological errors may occur in designing, writing, testing, and/or monitoring models and may be difficult to detect.

**Mutual Fund and Exchange-Traded Fund Risk:** Like any equities securities, mutual funds and exchange-traded funds (ETFs) can decline in value over short or extended periods for many reasons including, but not limited to, market conditions, economic and political conditions, and changes in the financial conditions of a fund’s underlying securities. Additionally, mutual funds and ETFs both incur internal and administrative fees, which are subject to change and ultimately reduce investment returns. These internal and administrative fees are disclosed in each fund’s prospectus. Mutual funds and ETFs focused on fixed-income assets such as bonds are subject to interest rate risk. For example, when interest rates rise, fixed income security prices fall. Non-

indexed ETFs can trade at a price above (premium) or below (discount) net asset value, and a non-indexed ETF purchased at a premium may ultimately be sold at a discount.

**Omission of Risks:** This Brochure does not provide a comprehensive list of every possible source of risk. Every potential outcome of an investment cannot be predicted, and it cannot disclose every potential risk factor for every investment to clients. The value of securities that our Firm advises our clients to invest in may go up or down in response to factors not within our Firm's control, including but not limited to the status of an individual company underlying a security, or the general economic climate. Clients may suffer losses for any reason or no discernible reason.

**Operational Risk:** Our Firm is responsible for developing, implementing and operating appropriate systems and procedures, where required, to transmit all investment transactions and monitor risk on behalf of each client. Our Firm will rely on its systems, procedures and other data processing systems to provide its services. Certain elements of our Firm's operations are dependent upon systems operated by third parties. Our Firm may not be in a position to verify the reliability of such third-party systems or data. Failure of or errors in such systems could result in mistakes or delays in the execution, confirmation or settlement of transactions for clients, or in transactions not being properly booked, evaluated or accounted for.

**Options:** Sellers of uncovered call options assume the risk of a theoretically unlimited increase in the market price of the underlying security while sellers of uncovered put options assume the risk of a decrease in the market price of the underlying security possibly to zero. Buyers of options risk losing their entire investment.

**Preferred Stocks Risk:** A preferred stock is a blend of the characteristics of a bond and common stock. Preferred stock offers the higher yield of a bond and has priority over common stock in the event of a liquidation but does not have the seniority of a bond and, unlike common stock, preferred stock's participation in the issuer's growth may be limited. Preferred stock has preference over common stock in the receipt of dividends and in any residual assets after payment to creditors should the issuer be dissolved. Although the dividend on a preferred stock may be set at a fixed annual rate, in some circumstances it can be changed or omitted by the issuer. Because preferred stocks represent an equity ownership interest in an issuer, the value of preferred stock usually reacts more strongly than bonds and other debt instruments to actual or perceived changes in an issuer's financial condition or prospects, fluctuations in the equity markets, and performance of the underlying common stock.

**Public Health Crisis Risks:** A public health crisis, pandemic, epidemic or outbreak of a contagious disease, such as the recent global outbreak of COVID-19, could have an adverse impact on global, national and local economies, which in turn could negatively impact our investments and strategies. Disruptions to commercial activity resulting from the imposition of quarantines, travel restrictions or other measures, or a failure of containment efforts, may adversely affect our investments in various ways, including but not limited to, decreased demand, supply chain delays, disruptions or staffing shortages. The outbreak of COVID-19 has contributed to, and may continue to contribute to, volatility in financial markets, including market liquidity and changes in interest rates. A continued outbreak may have a material and adverse impact on our investment returns. The impact of a public health crisis such as the COVID-19 (or any future pandemic, epidemic or

outbreak of a contagious disease) is difficult to predict, which presents material uncertainty and risk with respect to the performance of our investments and strategies.

**Reinvestment Risk:** This is the risk that future gains may be reinvested at less favorable (lower) rates of return than currently available.

**Risks Relating to the Operation of Markets:** Client accounts may incur losses in the event of the early closure of, complete closure of, suspension of trading in, or similar interruptions affecting one or more domestic or international markets, trading venues, or clearinghouses on or through which we trade on behalf of our clients.

**Short-Term Purchase Risk:** Certain investment strategies purchase securities with the intent to sell them within a relatively short period of time (typically a year or less). Short-term purchasing is done in an attempt to take advantage of conditions that may soon result in a favorable price swing in the securities purchased. A risk in a short-term purchase strategy is that, should the anticipated price swing not materialize, the portfolio can be left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or taking a loss. In addition, this strategy involves more frequent trading than does a longer-term strategy and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

**Strategy:** Our Firm cannot guarantee that its recommendations will be implemented at all times and it may make investments not in keeping with the general description provided in this Brochure. There can be no guarantee that suitable investment opportunities will be available at all times.

**Systemic Risk:** Our Firm relies on the stability of the overall financial system to implement its investment strategy. The security of client assets depends on the solvency of their chosen custodian. In the event of a disruption to the custodian's business or the overall functioning of securities markets, including any securities clearing houses, middleware providers or other system infrastructure providers, our Firm may be unable to implement its investment services and clients may experience a significant or complete loss of their capital.

**Valuation Risks:** In valuing assets that lack a readily ascertainable market value, Hedges Asset Management or its agent may utilize dealer-supplied quotations or pricing models based on methodologies that are subject to error.

Clients should be aware their investment is not guaranteed and understand that there is a risk of loss of value in their investment.

## Item 9 Disciplinary Information

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### REQUIRED DISCLOSURES

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Under the Investment Advisers Act of 1940, as amended (the “*Adviser’s Act*”) you are entitled to know of any material disciplinary events regarding Hedges Asset Management or any of its

management persons. Hedges Asset Management has no legal or disciplinary events to disclose in response to this item.

## **Item 10 Other Financial Industry Activities and Affiliations**

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### **OUTSIDE BUSINESS ACTIVITIES**

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None of Hedges Asset Management, its employees and management persons are registered or has registered or have an application pending to register as a broker-dealer or registered representative of a broker-dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

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### **AFFILIATED ENTITIES**

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Hedges Asset Management does not have any business relationships with other entities that create a material conflict of interest for our clients.

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### **OTHER INVESTMENT ADVISERS**

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Hedges Asset Management does not recommend or select other investment advisers for our clients. Hedges Asset Management does not receive compensation directly or indirectly from any other investment advisers, creating a material conflict of interest. Hedges Asset Management does not have any business relationships with other investment advisers that create a material conflict of interest for our clients.

## **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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### **CODE OF ETHICS**

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Hedges Asset Management has adopted a Code of Ethics (the “Code”) that sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Hedges Asset Management and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the Firm’s access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Clients and prospective clients may request a full copy of our Firm's Code of Ethics by contacting our Firm in writing at [hedgesassetmanagementllc@gmail.com](mailto:hedgesassetmanagementllc@gmail.com) or calling our Firm at (775) 843-2069.

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## PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

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Hedges Asset Management and/or our adviser(s) may invest in the same securities that are recommended to and/or purchased for our clients. Conflicts of interest may arise when Hedges Asset Management has the ability to trade the same securities that recommended to and/or purchased for our clients ahead of executing clients' orders, in favor of Hedges Asset Management. That is because Hedges Asset Management possesses proprietary information as to the positions and volumes of securities in client's accounts. Hedges Asset Management and/or our advisers do not recommend securities to our clients in which Hedges Asset Management and/or our advisors has a material financial interest.

Hedges Asset Management addresses these conflicts in a number of ways, including disclosure of conflicts in this Brochure. In addition, Hedges Asset Management has adopted a compliance manual which establishes a number of restrictions, procedures and disclosures designed to address potential conflicts of interest and to assure that the personal securities transaction, activities and interests of Hedges Asset Management and/or our advisors will not interfere with our ability to make investment decisions in the best interest of our clients.

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## PERSONAL TRADING

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Hedges Asset Management maintains and enforces written policies and procedures reasonably designed to prevent the misuse of trading information and material non-public information by our Firm or any access persons of our Firm with regards to their personal securities transactions. Personal trading activities are monitored to reasonably prevent conflicts of interest between our Firm and our clients.

## **Item 12 Brokerage Practices**

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### SELECTION OF BROKER-DEALERS

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Securities transactions are generally executed through Charles Schwab & Co. member FINRA/SIPC/NYSE. Charles Schwab maintains custody of our clients' assets and effect securities transactions for our investment management clients' accounts. Hedges Asset Management is independently owned and operated and is not affiliated with or a related person of Charles Schwab.

Hedges Asset Management considers a number of factors prior to recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, their commission rates or other fee schedules, their custodial services, their level of net capital (financial strength) and excess SIPC and other insurance coverage. The commissions charged by Charles Schwab are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are

advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

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#### RESEARCH AND OTHER SOFT DOLLAR BENEFITS

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Hedges Asset Management does not participate in soft-dollar arrangements with Charles Schwab & Co. Hedges Asset Management does not participate in any commission-sharing arrangements or receive soft dollar credits. While the benefits we receive from Charles Schwab & Co. do not depend on the amount of brokerage transactions directed to Charles Schwab & Co., as a fiduciary we are required to disclose that there is an inherent conflict of interest when our Firm recommends that clients maintain their assets at Charles Schwab. These recommendations may be based in part on the benefits we receive from Charles Schwab, such as the availability of the abovementioned products and services, and not solely on our clients' interest in receiving most favorable execution. Nonetheless, we seek to ensure that the securities transactions effected for our clients represent the best qualitative execution, not just the lowest possible cost.

Our Firm routinely compares order execution disclosure information at Charles Schwab to other broker-dealers to ensure that Charles Schwab remains competitive in providing best execution for our clients' securities transactions. Although the brokerage commissions and/or transaction fees charged by Charles Schwab may be higher or lower than those charged by other broker-dealers, in seeking best execution for our clients our Firm strives to ensure that our clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided by Charles Schwab.

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#### BROKERAGE FOR CLIENT REFERRALS

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Hedges Asset Management does not consider broker-dealer or third-party referrals in selecting or recommending broker-dealers to our clients as this would create a conflict of interest.

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#### DIRECTED BROKERAGE

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While Hedges Asset Management may recommend that clients direct transactions through certain broker-dealers, we do not have discretionary authority to determine the broker-dealer to be used for the purchase or sale of securities for client accounts or the commission rates paid to a broker-dealer for client securities transactions.

In rare cases, Hedges Asset Management may utilize other broker-dealers when requested by the client. Clients of Hedges Asset Management must be aware that if they direct us to use a particular broker-dealer that it may limit our ability to achieve best execution or limit their participation in block trading. As a result, clients may pay higher commissions, have higher transaction costs, or receive less favorable prices. In situations where the client directs us to effect their transactions through a particular broker-dealer, we require such directions to be in writing.

## **Item 13 Review of Accounts**

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### **ACCOUNT REVIEWS**

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Hedges Asset Management conducts account reviews on at least a weekly basis for clients subscribed to our investment management services. The frequency of the review depends upon a variety of factors such as the client's risk profile, activity in the account, economic and market conditions, and the client's preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Formal client review meetings are generally conducted on a regular basis at intervals mutually agreed upon by our Firm and the client, but no less than quarterly. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

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### **ACCOUNT REPORTS**

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Clients receive at least monthly reports from our Firm summarizing their account(s) and investment results. Reports may be furnished in writing or electronically as requested by the client. Clients are urged to compare the account statements they receive from Charles Schwab & Co. to any written reports or invoices received from our Firm and promptly notify us of any discrepancies.

## **Item 14 Client Referrals and Other Compensation**

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### **CLIENT REFERRALS**

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Our Firm does not currently compensate third-parties (or "solicitors") to promote the investment advisory services offered by our Firm.

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### **OTHER COMPENSATION**

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Hedges Asset Management does not receive any economic benefits from parties other than our clients in exchange for our provision of investment advice or other advisory services.

## **Item 15 Custody**

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### **CUSTODY OF CLIENT FUNDS AND SECURITIES**

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Hedges Asset Management does not hold physical custody over client assets or accounts. Charles Schwab & Co. is the qualified custodian and maintains custody of client funds in separate brokerage account(s) for each client under the client's name. We do not have the authority to obtain possession of assets. However, Hedges Asset Management could have "deemed custody" of client funds solely as a consequence of our ability to deduct fees from client accounts.



## **Item 16 Investment Discretion**

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### **DISCRETIONARY AUTHORITY**

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Hedges Asset Management manages client securities portfolios on a discretionary basis. Hedges Asset Management is granted limited discretionary authority in writing by the client at the outset of the advisory relationship. This limited discretionary authorization gives Hedges Asset Management the authority to manage the client's investment assets in its sole discretion and without consulting with the client in advance, subject to the investment objectives, guidelines and restrictions set by the client.

## **Item 17 Voting Client Securities**

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### **AUTHORITY TO VOTE CLIENT PROXIES**

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Hedges Asset Management does not accept authority from clients with respect to the voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios. The qualified custodian holding clients' assets will send all such proxy documents it receives to the client so that the client may take whatever action the client deems appropriate. While our Firm will not provide an opinion or advice, however, we are available to answer questions.

## **Item 18 Financial Information**

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### **REQUIRED DISCLOSURES**

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Hedges Asset Management has no financial commitments that would impair our Firm's ability to meet our contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.