UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT ADVISERS ACT OF 1940
Release No. 4370 / April 15, 2016

ADMINISTRATIVE PROCEEDING
File No. 3-17050

In the Matter of

    Hudson Capital Partners
    Corporation

Respondent.

ORDER MAKING FINDINGS AND
IMPOSING REMEDIAL SANCTIONS

I.

The Securities and Exchange Commission ("Commission") has instituted public administrative proceedings against Hudson Capital Partners Corporation ("HCP" or "Respondent"), pursuant to Section 203(e) of the Investment Advisers Act of 1940 ("Advisers Act").

II.

In connection with these proceedings, Respondent has submitted an Offer of Settlement (the "Offer") which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission's jurisdiction over him and the subject matter of these proceedings and the findings contained in Sections III.1. and III.2. below, which are admitted, Respondent consents to the entry of this Order Making Findings and Imposing Remedial Sanctions ("Order"), as set forth below.

III.

On the basis of this Order and Respondent's Offer, the Commission finds that:

1. From April 2007 through May 2011, Respondent acted as the investment adviser to RAHFCO Funds LP and RAHFCO Growth LP (the "RAHFCO Hedge Funds"), two private hedge funds.

2. On December 22, 2016, an order of injunction was entered by default against HCP, permanently enjoining it from future violations of Section 17(a) of the Securities Act of 1933, Section 10(b) of the Exchange Act of 1934, Rule 10b-5 thereunder, Sections

206(1), 206(2), and 206(4) of the Advisers Act and Rule 206(4)-8 thereunder, in the civil action entitled *Securities and Exchange Commission v. Randal Kent Hansen, et al.*, Civil Action Number 13-cv-1403-VSB, in the United States District Court for the Southern District of New York.

3.   The Commission's complaint alleged that, from at least April 2007 through May 2011, HCP, as the investment adviser of the RAHFCO Hedge Funds, engaged in a scheme to defraud investors, the primary function of which was to convince investors to invest in fraudulent pooled investments that purportedly traded in options and futures on the S&P 500 Index and in equities, and then siphon off the invested funds for the defendants' own purposes. The Commission's complaint further alleges that, in fact, HCP did not follow the stated trading strategy, misrepresented the trading success, and misused investor funds to make Ponzi payments to other investors.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent HCP's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 203(e) of the Advisers Act, Respondent HCP be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, the satisfaction of any or all of the following: (a) any disgorgement ordered against the Respondent, whether or not the Commission has fully or partially waived payment of such disgorgement; (b) any arbitration award related to the conduct that served as the basis for the Commission order; (c) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (d) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

For the Commission, by its Secretary, pursuant to delegated authority.

Brent J. Fields
Secretary