

## **Brochure**

### **Form ADV Part 2A**

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



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**March 27, 2024**

This Brochure provides information about the qualifications and business practices of Nicholas Hoffman & Company, LLC. If you have any questions about the contents of this Brochure, please contact us at (404) 815-5050 or [nhoffman@nhoffmanandco.com](mailto:nhoffman@nhoffmanandco.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.

Nicholas Hoffman & Company, LLC 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 Nicholas Hoffman & Company, LLC also is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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

Registered Investment Advisers are required to use the Brochure 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 last annual update was filed on February 17, 2023. The complete Brochure is available to clients at any time upon request.

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## ***Item 4 - Advisory Business***

### **General Information**

Nicholas Hoffman & Company, LLC (“we,” “us” or “NHCO”) was formed in 2007 and provides financial planning and portfolio management services to its clients.

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

As of December 31, 2023, we managed \$5,863,278,450 on a discretionary basis, and \$818,289,314 of assets on a non-discretionary basis.

### **SERVICES OFFERED**

At the outset of each client relationship, we spend time with the client, asking questions, discussing the client’s investment experience and financial circumstances, and broadly identifying major goals of the client.

Clients may elect to retain us to prepare a full financial plan. This detailed analysis is presented to the client for consideration. In most cases, clients subsequently retain us to manage the investment portfolio on an ongoing basis.

For those financial planning clients making this election, and for other clients who do not need financial planning but retain us for portfolio management services, based on all the information initially gathered, we generally develop 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” or “Profile”);
- the client’s investment objectives and guidelines (the “Investment Plan” or “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 we will make or recommend on behalf of the client to meet those goals. The Profile and the Plan are discussed regularly with each client but are not necessarily written documents.

### **Financial Planning**

One of the services offered by us is financial planning, described below. This service may be provided as a stand-alone service or may be coupled with ongoing portfolio management.

Financial planning may include advice that addresses one or more areas of a client's financial situation, such as estate planning, risk management, budgeting and cash flow controls, retirement planning, education funding, and investment portfolio design and ongoing management. Depending on a client’s particular situation, financial planning may include some or all of the following:

- Gathering factual information concerning the client's personal and financial situation;
- Assisting the client in establishing financial goals and objectives;
- Analyzing the client's present situation and anticipated future activities in light of the client's financial goals and objectives;

- Identifying problems foreseen in the accomplishment of these financial goals and objectives and offering alternative solutions to the problems;
- Making recommendations to help achieve retirement plan goals and objectives;
- Designing an investment portfolio to help meet the goals and objectives of the client;
- Providing estate planning, and
- Reviewing goals and objectives and measuring progress toward these goals.

Once financial planning advice is given, the client may choose to have us implement the client's financial plan and manage the investment portfolio on an ongoing basis. However, the client is under no obligation to act upon any of the recommendations made by us under a financial planning engagement and/or engage the services of any recommended professional.

#### Portfolio Management

As described above, at the beginning of a client relationship, we meet with the client, gather information, and perform research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by us based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, we will manage the client's investment portfolio on a discretionary basis or a non-discretionary basis. As a discretionary investment adviser, we will have the authority to supervise and direct the portfolio without prior consultation with the client. Under a non-discretionary arrangement, clients must be contacted prior to the execution of any trade in the account(s) under management. This may result in a delay in executing recommended trades, which could adversely affect the performance of the portfolio. In a non-discretionary arrangement, the client retains the responsibility for the final decision on all actions taken with respect to the portfolio.

Notwithstanding the foregoing, clients may impose certain written restrictions on us 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 ours.

#### Private Funds

We will from time to time, based on the client's risk tolerance, sophistication and financial qualifications, recommend that a portion of the client's assets be invested in certain private investments. These include private equity, private debt and real estate funds, hedge funds, and other types of private investment vehicles (collectively "Private Funds"). We will assist clients in implementation of such recommendations to invest in Private Funds; however, we do not exercise discretion with respect to these types of investments. We will continue to render the advisory services to the client, relative to the ongoing monitoring and review of asset performance and due diligence of the Private Fund. Clients are provided with private placement memorandums and other offering and subscription documentation that detail the nature, risks and associated fees of each

Private Fund. It is important that the client read and review these documents with their legal and tax advisors, before investing, to fully understand the types of investments, risks and conflicts pertaining to the Private Funds.

#### Separate Account Managers

When appropriate and in accordance with the Investment Plan for a client, we may recommend the use of one or more separate account managers, each a “Manager”. Having access to various Managers offers a wide variety of manager styles and offers clients the opportunity to utilize more than one Manager if necessary to meet the needs and investment objectives of the client. We will select the Manager(s) we deem most appropriate for the client. Factors that we consider in recommending/selecting Managers generally includes the client’s stated investment objective(s), management style, performance, risk level, reputation, financial strength, reporting, pricing, and research.

The Manager(s) will be granted discretionary trading authority to provide investment supervisory services for the portfolio, but we normally retain the authority to terminate the Manager’s relationship or to add new Managers without specific client consent. With respect to assets managed by a Manager, our role will be to monitor the overall financial situation of the client, to monitor the investment approach and performance of the Manager(s), conduct on-going due diligence, and to assist the client in understanding the investments of the portfolio.

In instances where the services of one or more Managers are utilized, the fee assessed by the Manager(s) will be separate and in addition to our fee and will be detailed in a Management Agreement signed by the client.

Additionally, certain Managers may impose more restrictive account requirements than NHCO, and billing practices may vary. In such instances, we may be required to alter our corresponding account requirements and/or billing practices to accommodate those of the Manager(s).

#### Retirement Plan Advisory Services

Establishing a sound fiduciary governance process is vital to good decision-making and to ensuring that prudent procedural steps are followed in making investment decisions. We will provide Retirement Plan consulting services to Plans and Plan Fiduciaries as described below. The particular services provided will be detailed in the consulting agreement. The appropriate Plan Fiduciary(ies) designated in the Plan documents (e.g., the Plan sponsor or named fiduciary) will (i) make the decision to retain our firm; (ii) agree to the scope of the services that we will provide; and (iii) make the ultimate decision as to accepting any of the recommendations that we may provide. The Plan Fiduciaries are free to seek independent advice about the appropriateness of any recommended services for the Plan. Retirement Plan consulting services may be offered individually or as part of a comprehensive suite of services.

The Employee Retirement Income Security Act of 1974 (“ERISA”) sets forth rules under which Plan Fiduciaries may retain investment advisers for various types of services with respect to Plan assets. For certain services, we will be considered a fiduciary under ERISA.

With respect to any account for which we meet the definition of a fiduciary under Department of Labor rules, we acknowledge that both NHCO and its Related Persons are acting as fiduciaries. Additional disclosure may be found elsewhere in this Brochure or in the written agreement between us and Client.

### Fiduciary Consulting Services

- *Investment Selection Services*  
We will provide Plan Fiduciaries with recommendations of investment options consistent with ERISA section 404(c). Plan Fiduciaries retain responsibility for the final determination of investment options and for compliance with ERISA section 404(c).
- *Non-Discretionary Investment Advice*  
We provide Plan Fiduciaries and Plan Participants general, non-discretionary investment advice regarding asset classes and investments.
- *Investment Monitoring*  
We will assist in monitoring the plan's investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformation to the guidelines set forth in the investment policy statement and we will make recommendations to maintain or remove and replace investment options. The details of this aspect of service will be enumerated in the engagement agreement between the parties.

### Non-Fiduciary Services

- *Participant Education*  
We will provide education services to Plan Participants about general investment principles and the investment alternatives available under the Plan. Education presentations will not take into account the individual circumstances of each Plan Participant and individual recommendations will not be provided unless a Plan Participant separately engages us for such services. Plan Participants are responsible for implementing transactions in their own accounts.
- *Participant Enrollment*  
We will assist with group enrollment meetings designed to increase retirement Plan participation among employees and investment and financial understanding by the employees.

### Retirement Plan Rollovers

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We must act in your best interest and not put our interest ahead of yours. If we recommend that you roll over or transfer your retirement assets into an account to be managed by us, such a recommendation creates a conflict of interest if we will earn a new (or increase our current) advisory fee because of the rollover/transfer. You are under no obligation to roll over retirement assets to an IRA managed by us or to engage us to monitor and/or manage the account while maintained at your employer.

### ***Item 5 - Fees and Compensation***

#### General Fee Information

Fees paid to us are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third-party consultants. Please see ***Item 12 - Brokerage Practices*** for additional

information. Fees paid to us are also separate 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). The client should review all fees charged by funds, brokers, us and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

#### Financial Planning Fees

When we provide financial planning services to clients, these services are generally part of our portfolio management services. If a separate fee is to be charged for financial planning, it will be negotiated at the time of the engagement for such services and will normally be in the form of a fixed fee.

#### Portfolio Management Fees

The annual fee schedule, based on a percentage of assets under management, is as follows:

First \$1,000,000	1.25%
Next \$2,000,000	1.00%
Next \$2,000,000	0.75%
Next \$5,000,000	0.50%
Next \$10,000,000	0.40%
Amounts over \$20,000,000	0.30%

Although we have established the standard fee structure set forth above, we retain the discretion to negotiate or waive fees on a client-by-client basis. We may also negotiate a fixed fee or negotiate a minimum portfolio value and/or a minimum fee. In proposing the fee structure for your account(s), we consider the nature of our proposed advisory relationship, which is determined by the assets to be placed under our management, anticipated future additional assets, services provided, other accounts you may have with us, account type, portfolio style, account composition, and reporting, among other factors. Your specific annual fee structure is described in your Advisory Agreement ("Agreement") with us. Also, pre-existing advisory clients are subject to any minimum fee requirements and advisory fees in effect at the time the client entered into the advisory relationship with us. Therefore, the applicable minimum fee requirements as well as advisory fees paid will differ among clients, and other clients may pay less than you or have lower minimums.

Asset-based portfolio management fees are generally payable quarterly, in arrears. The client's total asset value at the end of each month in the quarter are averaged to calculate the "average monthly balance" for the quarter. The average monthly balance is applied to the annual fee schedule set out in the client's Agreement and then divided by four (4) to calculate the quarterly fee. Clients with a fixed fee arrangement may be charged quarterly in advance or arrears. Each client's specific fee arrangement is detailed in the client's Agreement with us.

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 we or the client may terminate the 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 us from the client will be invoiced or deducted from the client's account prior to termination.

#### Private Fund Fees

When a client invests in a Private Fund, the fees and other expenses assessed by the Private Fund will be separate from and in addition to our fee. Additionally, some of the Private Funds that we recommend charge performance-based fees. The applicable fees and expenses of each Private Fund are outlined in its offering documents and should be reviewed by investors prior to investing. We do not receive any portion of these fees.

#### Separate Account Manager Fees

Each Manager will assess its own fee, which will be charged according to the Manager's established fee schedule. This will be disclosed to the client prior to the time of the engagement.

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

We do 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 we have no performance-based fee accounts, we have no side-by-side management.

### ***Item 7 - Types of Clients***

We serve individuals, pension and profit-sharing plans, trusts, foundations, and estates. We may impose a minimum portfolio value eligible for conventional investment advisory services and/or a minimum fee.

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

#### Methods of Analysis

In accordance with the Investment Plan, we will primarily invest in ETFs, mutual funds, managed accounts, some common stock, and bonds. Some clients have financial objectives and needs which support consideration of Private Funds, which may include, without limitation, hedge funds, investments in real estate, private equity and private debt.

ETFs and Mutual funds are generally 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 returns, and other factors.

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

Directly held equities may be used where tax efficiency, avoidance of third-party management fees, and the potential for long-term dividend streams are desired by clients. We generally rely on third-party research reports from vendors like Refinitiv, Morningstar, and the Center for Financial Research and Analysis (CFRA) to evaluate the appropriateness of directly held equities.



Private Funds are generally evaluated based on the previous performance and reputation of the manager, fee structure, overall risk and returns, portfolio transparency, liquidity and other factors specific to the type of investments involved.

### Investment Strategies

Our strategic approach is to invest each portfolio in accordance with the Plan that has been developed specifically for each client. This means that 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.

Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

### Risk of Loss

While we seek 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 we manage client investment portfolios based on our 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 we allocate client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that our specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, we will usually 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.

*Equity Market Risks.* We may 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 (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* We 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.* We may invest portions of client assets directly into foreign securities or 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.

*Risks Related to Private Funds.* From time to time and as appropriate, we may invest a portion of a client's portfolio in Private Funds. The value of client portfolios will be based in part on the value of Private Funds 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 Private Fund 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 Private Funds 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. Private Funds are generally subject to various risk factors and liquidity constraints, a complete discussion of which is set forth in each fund's offering documents, which will be provided to clients for review and consideration prior to investing. Investing in Private Funds is intended only for experienced and sophisticated investors who are willing to bear the high economic risks of the investment. Clients should carefully review and consider potential risks before investing in private funds. Certain of these risks may include loss of all or a substantial portion of the investment due to leveraging, short-selling, or other speculative practices, lack of liquidity because of redemption terms and conditions and that there may not and will not be a secondary market for the fund, volatility of returns, restrictions on transferring interests in the fund, a potential lack of diversification, higher fees than mutual funds, lack of information regarding valuations and pricing.

*Real Estate Risk.* We may gain exposure to the real estate sector by investing in real estate or funds that invest in real estate. These investments are subject to risks including loss to casualty or condemnation, increases in property taxes and operating expenses, zoning law amendments, changes in interest rates, overbuilding and increased competition, variations in market value, and possible environmental liabilities.

*Margin Risk.* We do not use margin as an investment strategy. However, you may elect to borrow funds against your investment portfolio. For accounts with a margin balance, you are assessed the management fee based on the gross value of the assets in your account. In other words, your account value on which the fee is calculated is not reduced by the margin balance. This could create a conflict of interest where we may have an incentive to encourage the use of margin as this could

result in a higher market value and therefore an increased management fee. When securities are purchased, they may be paid for in full or the client may borrow part of the purchase price from the account custodian. If a client borrows part of the purchase price, the client is engaging in margin transactions and there is risk involved with this. The securities held in a margin account are collateral for the custodian that loaned the client money. If those securities decline in value, then the value of the collateral supporting the client's loan also declines. As a result, the brokerage firm is required to take action in order to maintain the necessary level of equity in the client's account. The brokerage firm may issue a margin call and/or sell other assets in the client's account to accomplish this. It is important that clients fully understand the risks involved in trading securities on margin, including but not limited to:

- It is possible to lose more funds than is deposited into a margin account;
- The account custodian can force the sale of assets in the account;
- The account custodian can sell assets in the account without contacting the client first;
- The account holder is not entitled to choose which assets in a margin account may be sold to meet a margin call;
- The account custodian can increase its "house" maintenance margin requirements at any time without advance written notice; and
- The account holder is not entitled to an extension of time on a margin call.

#### ***Item 9 - 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 us or the integrity of our management. We have no disciplinary events to report.

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

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

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

##### **Code of Ethics and Personal Trading**

We have adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Our Code has several goals. First, the Code is designed to assist us in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, we owe fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with us (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 NHCO's associated persons. Under the Code's Professional Standards, NHCO expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, NHCO associated persons are not to take inappropriate advantage of their positions in relation to our clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, NHCO's associated persons may invest in the same securities recommended to clients. In the Code, we have 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 client accounts are primarily invested in open end mutual funds, pooled investment vehicles and independently managed accounts there is little opportunity for a conflict of interest between personal trades by NHCO associated persons and trades in client accounts, even when such accounts invest in the same securities. However, in the event of other identified potential trading conflicts of interest, our goal is to place client interests first.

Consistent with the foregoing, we maintain policies regarding participation in initial public offerings (“IPOs”) and private placements to comply with applicable laws and avoid conflicts with client transactions. If a NHCO associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

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 our written policy.

### ***Item 12 - Brokerage Practices***

#### ***The custodians and brokers we use***

We do not maintain custody of your assets that we manage or on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see ***Item 15 – Custody***, below).

Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that most of our clients use Charles Schwab & Co., Inc. (“Schwab”), as the qualified custodian. In certain limited instances, we may recommend the custodial services of Fidelity Institutional Wealth Services (“Fidelity”), a division of Fidelity Brokerage Services LLC, for ultra-high-net-worth clients who would benefit from Fidelity’s suite of family office services. Schwab and Fidelity (together, the “Custodians”) are registered broker-dealers, members SIPC. We are independently owned and operated and are not affiliated with the Custodians.

The account custodian will hold your assets in a brokerage account and buy and sell securities when we (or you) instruct them to. While we recommend that you use Schwab (or Fidelity in limited instances) as custodian/broker, you will decide whether to do so and will open your account with the custodian by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at one of our recommended custodians, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”)

### ***How we select brokers/custodians***

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including, but not limited to:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from the Custodians”)

### ***Your brokerage and custody costs***

The Custodians generally do not charge you separately for custody services but are compensated by charging you commissions or other fees on trades that they execute or that settle into your account. Certain trades may not incur commissions or transaction fees. The Custodians are also compensated by earning interest on the uninvested cash in your account. In addition to commissions, you may be charged a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your account. These fees are in addition to the commissions or other compensation you pay the executing broker/dealer. Because of this, in order to minimize your trading costs, we have your account custodian execute most trades for your account. We have determined that having your account custodian execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

### ***Products and services available to us from the Custodians***

The Custodians provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to their retail customers. They also make available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. These support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of the support services offered by the Custodians:

### ***Services That Benefit You.***

The Custodians’ brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. They make investment products

available to us that include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Such services generally benefit you and your account.

***Services that may not directly benefit you.***

The Custodians also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both their own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at the custodian from which we obtained the research. In addition to investment research, the Custodians also make available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients' accounts
- assist with back-office functions, recordkeeping, and client reporting

***Services that generally benefit only us.***

The Custodians also offer other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

The Custodians may provide some of these services themselves. In other cases, they will arrange for third-party vendors to provide the services to us. They may also discount or waive their fees for some of these services or pay all or a part of a third party's fees. We also may be provided with other benefits such as occasional business entertainment of our personnel.

***Our interest in the Custodians' services***

The availability of these services from the Custodians benefits us because we do not have to produce or purchase them. These services are not contingent upon us committing any specific amount of business to the Custodians in trading commissions or assets in custody. However, the benefits that we and our clients receive create an incentive to recommend that you maintain your account with the Custodians, based on our interest in receiving their services that benefit our business and their payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest.

We believe, however, that our recommendation of the Custodians is in the best interests of our clients. Our selection is primarily supported by the full scope, quality, and price of their services (see "How we select brokers/ custodians") and not the services that benefit only us.

### Directed Brokerage

Clients may direct us to use a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, the client is responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangements that we have with the Custodians is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing us to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with us that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

### Aggregated Trade Policy

We typically direct trading in individual client accounts as and when trades are appropriate based on the client's Investment Plan, without regard to activity in other client accounts. However, from time to time, we may aggregate trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, we will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by us or our officers, directors, or employees will be excluded first.

### ***Item 13 - Review of Accounts***

Managed portfolios are generally reviewed 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 us. These factors generally include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Nicholas J. Hoffman, a designated Principal, or a Senior Investment Advisor of the firm, 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, we provide at least an annual 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.

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

As noted above, we receive an economic benefit from the Custodians in the form of support products and services they make available to us and other independent investment advisors whose clients' accounts they maintain. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices***. The availability of the products and services the Custodians provide to us are based solely on our participation in their programs and not on the provision of any particular investment advice.

#### ***Item 15 - Custody***

Schwab is the custodian of the large majority of our client accounts. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, 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 us of any questions or concerns. Clients are also asked to promptly notify us if the custodian fails to provide statements on each account held.

From time to time and in accordance with our Agreement with clients, we 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 and pending trades or similar issues.

In limited instances, certain clients have provided us with the ability to access their accounts to assist with paying bills. Under these circumstances, we follow additional safeguarding procedures established by the SEC. Specifically, the funds and securities held in accounts for which we have bill payment capabilities will be subject to a surprise "custody" examination at least once during each calendar year by an independent public accountant retained by us for that purpose.

#### ***Item 16 - Investment Discretion***

As described in ***Item 4 - Advisory Business***, we will accept clients on either a discretionary or non-discretionary basis. For *discretionary accounts*, a Limited Power of Attorney ("LPOA") is executed by the client, giving us 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. We then direct 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 Agreement with us and the requirements of the client's custodian.

For *non-discretionary* accounts, the client also generally executes an LPOA, which allows us to carry out trade recommendations and approved actions in the portfolio. However, in accordance with the Agreement between us and the client, we do not implement trading recommendations or other actions in the account unless and until the client has approved the recommendation or action. As with discretionary accounts, clients may limit the terms of the LPOA, subject to our Agreement with the client and the requirements of the client's custodian.



***Item 17 - Voting Client Securities***

As a policy and in accordance with our Agreement, we do 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 us with questions relating to proxy matters; however, we do not generally perform detailed research regarding proxy voting options.

***Item 18 - Financial Information***

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

# **Exhibit A**

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Nicholas J. Hoffman**

**CRD# 1513288**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Nick Hoffman, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Nick is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Nicholas J. Hoffman (year of birth 1957) founded NHCO in 2007 and has overall responsibility for its management and the investment strategies for all clients. From 2002 until 2007, Nick was a partner with Diversified Trust, a southeastern based Private Trust Company. Prior to that, he was a partner with Balentine & Company (1992 - 2001) a local Investment Advisory firm now a part of Wilmington Trust, where Nick designed and directed the firm's integrated approach to strategic tax and financial planning.

Nick served for over sixteen years on the Board of Goodwill Industries (Atlanta), including serving as Chairman. He also serves on the Board and is a past Chairman of the Society of International Business fellows ("SIBF"). As the founder of "The Responsibility of Wealth Forum", he has been featured on National Public Radio ("NPR") as well as in several national publications. He has also taught a course to the 12<sup>th</sup> Grade at Pace Academy on *Money and Finance* and conducts an annual summer program on "Money & Responsibility" at Cambridge University.

Nick was born and educated in England, where he received an honors degree in Law from the University of Exeter. He began his career as a Chartered Accountant with KPMG in London and Germany. He is a Fellow of the Institute of Chartered Accountants.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Nick has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Nick is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Nick has no other income or compensation to disclose.

***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Nick and may be reached at (404) 815-5050.

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Gary B. Martin, CFA**

**CRD# 1686747**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Gary Martin, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Gary is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Gary B. Martin (year of birth 1961) is a Principal of NHCO with responsibilities that include client account management and general firm directives. Gary is also a member of NHCO's Investment Management Committee, which oversees the investment process. He has over forty years of financial services experience. For more than thirty years, Gary has worked extensively with individuals and their families providing comprehensive wealth management. Gary's expertise includes investment management and allocation, manager research and all aspects of the financial planning process.

Prior to joining NHCO in 2009, Gary was with Wilmington Trust Company as the senior team leader responsible for managing the largest private wealth group within the Atlanta office for six years. Prior to that, he was a senior partner with Balentine & Company an Atlanta based investment advisory firm that was acquired by Wilmington Trust in 2002. Gary began his career on Wall Street spending the first seven years with Bankers Trust Company and then UBS Securities where he worked in various institutional sales and trading functions.

Gary was born in Chicago, received his undergraduate degree from Harvard University, and his graduate degree in business administration from Emory University. He received his Chartered Financial Analyst® designation\* in 1997.

Gary and his wife live in the Virginia Highland neighborhood of Atlanta and have five adult children. Gary is an avid cyclist, ice hockey player and fitness enthusiast.

\* The Chartered Financial Analyst® (“CFA®”) designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor’s degree.

### ***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Gary has no such disciplinary information to report.

### ***Item 4 - Other Business Activities***

Gary is not engaged in any other business activities.

### ***Item 5 - Additional Compensation***

Gary has no other income or compensation to disclose.

### ***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Gary and may be reached at (404) 815-5050.

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**A. Carl Gambrell**

**CRD# 1270376**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Carl Gambrell, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Carl is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

A. Carl Gambrell (year of birth 1955) is a Principal of NHCO with responsibilities that include client account management and general firm directives. Carl is also a member of NHCO's Investment Management Committee, which oversees the investment process. He has extensive experience as an investment professional with over forty-five years as a portfolio manager and an institutional fixed income specialist. Prior to joining NHCO in 2009, Carl was a director with Merrill Lynch (eleven years) and Credit Suisse First Boston (fourteen years). His depth of product expertise covers all fixed income securities.

Over the course of his career, Carl has had client relationship responsibilities for some of the largest and most sophisticated institutional accounts in the country including international money managers, life insurance companies, public pension funds, hedge funds and major US commercial banks. During the first seven years of his career, Carl was a Senior Vice President and head of the investment department at two financial institutions in the Southeast with responsibilities for security selection, market timing, and asset liability management.

Carl graduated from Mississippi State University with a degree in Finance. He and his wife have two daughters. Carl is a member of the First Presbyterian Church of Atlanta. He is passionate about college football and loves working on renovation projects around his home.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Carl has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Carl is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Carl has no other income or compensation to disclose.

***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Carl and may be reached at (404) 815-5050.



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**Form ADV Part 2B**

**Item 1 - Cover Page**

**Eleanor D. Quarles**

**CRD# 1422288**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Eleanor Quarles, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Eleanor is available on the SEC's website at  
**[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov)**.

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***Item 2 - Educational Background and Business Experience***

Eleanor D. Quarles (year of birth 1960) is the Director of Client Services for NHCO, where she is responsible for client account administration and operations. Prior to joining NHCO in 2007, Eleanor worked as a Client Service Officer for Wilmington Trust Wealth Advisory Services, servicing high net worth families, individuals and foundations for seventeen years. She was a member of Wilmington Trust's Diversity Council to the National Offices.

Eleanor began her career at Merrill Lynch Pierce Fenner and Smith in Princeton, New Jersey. She is a graduate of Douglas College, Rutgers University.

Eleanor is a founding member of Transformational Ministries International, formerly known as First Congregation Ministries of Stone Mountain, Georgia, where she participates in various community outreach initiatives from finances to emotional health. She was a founding member of New Creation Christian Fellowship where she served as the Director of the Children's Church and facilitated Restored, a divorce support outreach ministry. She was a founding member of the women's investment club, Increasing Wealth Amongst My Sisters, better known as IWAMS and served as

president for one term. Eleanor currently Serves on the Advisory Committee of Transformational Ministries Global Network, a 501(c)(3) initiative that promotes financial literacy through its program called In The Black On The Plus Side. She and her husband have 3 sons.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Eleanor has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Eleanor is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Eleanor has no other income or compensation to disclose.

***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Eleanor and may be reached at (404) 815-5050.

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**Form ADV Part 2B**

**Item 1 - Cover Page**

**Cameron R. Simonds**

**CRD# 5389633**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Cam Simonds, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Cam is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Cameron R. Simonds (year of birth 1984) is Senior Investment Advisor for NHCO with responsibilities including client account management and participation in developing the firm's investment platform, primarily in the private investing arena. Cam works with clients on investment strategy and allocation, strategic planning, and cash flow management.

Prior to joining NHCO in 2011, Cam was with Executive Advisor Group as an Associate where he gained experience in portfolio management operations and comprehensive financial planning.

Cam grew up in Atlanta, attended Pace Academy and is a graduate of Presbyterian College with a bachelor's degree in Business Administration.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Cam has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Cam is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Cam has no other income or compensation to disclose.

***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Cam and may be reached at (404) 815-5050

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**Form ADV Part 2B**

**Item 1 - Cover Page**

**Richard Rushton**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Richard Rushton, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact NHCO at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

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***Item 2 - Educational Background and Business Experience***

Richard Rushton (year of birth 1958) serves as Chief Compliance Officer and Chief Operating Officer and advises NHCO on all operational and compliance matters. Richard is also a member of NHCO's Investment Management Committee, which oversees the investment process. Richard initially assisted with the formation of NHCO and continued to serve in a dedicated consulting role until formally joining the firm in 2015. He has over twenty-six years of experience in business management, consulting, and economic analysis.

After working initially as an economist and policy advisor in London, England, Richard spent ten years consulting for, and then managing, fast growing retail banking operations including mortgages, savings and investment services. In the U.S., he jointly led the growth of a Federal services provider from annual revenues of \$15 million to \$350 million over a ten-year period. In 2001, the Company was sold to a publicly quoted UK company. Richard subsequently served as CEO of the U.S. Company, and as a member of the Executive Board of the British parent company.

Richard was born and educated in England. He received his undergraduate degree from the University of Reading, and his graduate degree in Economics from the University of Oxford. Richard is a past Chair of Soccer in the Streets, and Goodwill Industries of North Georgia. He and his wife have three sons and a daughter.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Richard has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Richard is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Richard has no other income or compensation to disclose.

***Item 6 - Supervision***

As the firm's Chief Operating Officer and Chief Compliance Officer, Richard is responsible for oversight of the firm's advisory services activities and its associated staff. As sole owner of the firm, Nicholas Hoffman is responsible for oversight of Mr. Rushton. Please address questions relative to the firm, staff, its services, or this ADV Part 2 or any Advisory Supplemental Brochure to the attention of Richard or Nick at (404) 815-5050. Additional information about our firm, other advisory firms, or an associated representative is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Michael W. Masters, MBA**

**CRD# 5495395**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street

Suite 1450

Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Mike Masters, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Mike is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Michael W. Masters (year of birth 1964) is a Senior Investment Advisor for NHCO with responsibilities including client account management and participation in developing the firm's investment platform, primarily in public investing and hedge funds. Mike works with clients on investment strategy, asset allocation and security selection, performance monitoring, and cash flow management.

Mike has over 25 years of financial market experience. Prior to joining Nicholas Hoffman & Company in 2014, Mike worked as Vice President and Portfolio Manager at Sterling Investment Management, Inc. where he was responsible for managing the investment portfolios of several affluent families. Prior to joining Sterling, Mike worked as Portfolio Manager at Daniel Financial Group where he was responsible for more than \$50 million in assets under management. Previously he has worked in the equity research department of a mutual fund company with more than \$500 million in assets under management. He has also performed buy-side equity research for a private investment partnership where he supported a team that managed a concentrated stock portfolio.

Mike holds a BA in Philosophy from Emory University where he graduated with honors. He holds an MBA in Finance and Real Estate from Georgia State University. Mike is a member of the CFA Institute and the Atlanta CFA Society.

Mike and his wife Kathy are avid cyclists and fitness enthusiasts.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Mike has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Mike is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Mike has no other income or compensation to disclose.

***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Mike and may be reached at (404) 815-5050.



**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Lloyd B. Flood, CFA**

**CRD# 6869285**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Lloyd Flood, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Lloyd is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Lloyd B. Flood (year of birth 1962) joined NHCO in 2017 and serves as a Senior Investment Advisor. Lloyd has thirty years of experience working as a portfolio manager, trader, and financial analyst. He has deep knowledge of financial markets, and the importance of asset allocation and due diligence. Lloyd has been in Atlanta for the entirety of his professional life, spending ten years at Bank South/Bank of America (1985-1995), and twenty years at ING/Voya (1996-2016). During that time, he worked in both the public and private asset classes with a primary focus on fixed income. He managed assets for company accounts and trusts, partnering with clients on the customized mandate and portfolio construction process. Lloyd has a real insider's perspective on how Wall Street and the markets function.

Lloyd was born and raised in the south. He earned a bachelor's degree in business administration in finance from Auburn University (1984), a master's degree in business administration from Mercer University (1990) and became a CFA charterholder (1997). He is a member of the CFA Institute. Lloyd also completed the Certified Financial Planner™ practitioner program (2019); however, he no longer

maintains this certification. Lloyd was selected for the ING Business Program in the Netherlands (2000).

Lloyd's volunteer activities have been primarily related to his children's schools starting at the Lovett School and continuing most recently by serving on the parents' council at Washington College in Chestertown, MD. He spends his free time enjoying being with his family in Atlanta, with an occasional trip to the NC mountains.

\* The Chartered Financial Analyst® ("CFA®") designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor's degree.

\*\*The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

### ***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Lloyd has no such disciplinary information to report.

### ***Item 4 - Other Business Activities***

Lloyd is not engaged in any other business activities.

### ***Item 5 - Additional Compensation***

Lloyd has no other income or compensation to disclose.

### ***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Lloyd and may be reached at (404) 815-5050.

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Caroline H. McInerney**

**CRD# 2767841**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Caroline McInerney, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Caroline is available on the SEC's website at  
**[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov)**.

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***Item 2 - Educational Background and Business Experience***

Caroline McInerney (year of birth 1973) joined NHCO in 2020 as an Investment Advisor, where she supports clients with all aspects of the client relationship. During her professional life she has worked in a variety of financial services and investment environments from small firms to Fortune 500 companies. Most recently, she served as a financial advisor with Raymond James Financial services. Prior to that, Caroline was an Investment Associate with Clements Financial Services.

Caroline was born and raised in the south. She earned her BA in English Literature from the University of the South (1995), and a master's degree in business administration from Vanderbilt University's Owen Graduate School of Management.

Caroline's volunteer activities have been primarily related to her children's school, Blessed Trinity Catholic High School.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Caroline has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Caroline is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Caroline has no other income or compensation to disclose.

***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Caroline and may be reached at (404) 815-5050.

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Carey S. Blakley, CFA®**

**CRD# 7446075**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Carey Blakley, and supplements the Nicholas Hoffman & Company, LLC (“NHCO”) Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO’s Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Carey is available on the SEC’s website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Carey Blakley (year of birth 1988) is a Senior Manager, Portfolios and Allocations for NHCO. His responsibilities include general development of the firm’s investment platform with a particular focus on real estate and public equities, providing oversight and guidance to our client reporting team, and strategic planning for business initiatives involving technology solutions.

Prior to joining NHCO in 2014, Carey was a full-time student, delivery driver, and construction contractor.

Carey earned a Bachelor of Business Administration from the Georgia Institute of Technology in 2014. He received his Chartered Financial Analyst® designation\* in 2021.

\* The Chartered Financial Analyst® (“CFA®”) designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of

examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor's degree.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Carey has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Carey is not engaged in any other business activities.

***Item 5 - Additional Compensation***

Carey has no other income or compensation to disclose.

***Item 6 - Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm's Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Carey and may be reached at (404) 815-5050.

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**Jeffrey S. Buck, CFA®**

**CRD# 2239235**

**of**

**Nicholas Hoffman & Company, LLC**

1355 Peachtree Street  
Suite 1450  
Atlanta, Georgia 30309

(404) 815-5050

**March 27, 2024**

This Brochure Supplement provides information about Jeffrey S. Buck, and supplements the Nicholas Hoffman & Company, LLC ("NHCO") Brochure. You should have received a copy of that Brochure. Please contact us at (404) 815-5050 if you did not receive NHCO's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Jeffrey is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Educational Background and Business Experience***

Jeffrey ("Jeff") S. Buck (year of birth 1966) joined NHCO in 2021 as a Senior Investment Advisor with responsibilities including client account management and participation in developing the firm's investment platform, primarily in private income. Jeff works with clients on investment strategy and allocation, strategic planning, and cash flow management. Jeff has over 30 years of financial market experience; providing manager selection, portfolio construction, and asset allocation in close collaboration with clients and client teams.

Prior to joining Nicholas Hoffman & Company, Jeff was a partner at Diversified Trust Company, a southeastern based Private Trust Company, for 10 years where he was first an investment generalist before being promoted to Director of Diversifiers. In 2020, Jeff additionally took over lead of the firm's Asset Allocation. Prior to that, Jeff worked at several firms, primarily in the southeast, as a senior investment team professional, including as lead Portfolio Manager for the hedge fund of funds at Wilmington Trust Company, and Chief Investment Officer at Homrich Berg in Atlanta.

Jeff earned a Bachelor of Arts in Economics from Syracuse University. He holds the Chartered Financial Analyst® designation\* and is a member of the CFA Institute and the CFA Society Atlanta.

In addition to raising their two sons, he and his wife have served as foster parents.

\* The Chartered Financial Analyst® (“CFA®”) designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor’s degree.

### ***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Jeff has no such disciplinary information to report.

### ***Item 4 - Other Business Activities***

Jeff is not engaged in any other business activities.

### ***Item 5 - Additional Compensation***

Jeff has no other income or compensation to disclose.

### ***Item 6 – Supervision***

Among other oversight obligations, the firm monitors the personal securities transactions, business activities, advisory services, and communications of all its personnel. Staff must review and acknowledge their adherence to the firm’s Code of Ethics and other pertinent policies and guidelines. As Chief Compliance Officer, Richard Rushton is responsible for compliance supervision of Jeff and may be reached at (404) 815-5050.