

Item 1: Cover Page
Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure
April 6, 2020

Hobart Private Capital Wrap Program
Sponsored by:
Hobart Private Capital, LLC

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Chief Compliance Officer

This wrap fee program brochure provides information about the qualifications, business practices and advisory services of Hobart Private Capital, LLC ("Hobart," "our," "we" and "Firm"), an investment adviser registered with the U.S. Securities and Exchange Commission ("SEC"). If you have any questions about the contents of this brochure, please contact us at (888) 553-0122 or Info@HobartFinancialGroup.com. The information in this brochure has not been approved or verified by the SEC or by any State securities authority. Additional information about our Firm is also available on the SEC's website at www.adviserinfo.sec.gov. There you may search for us by our Firm name or by our "CRD" which is #168494.

Please note that the use of the term "registered investment adviser" and description of our Firm and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this brochure and brochure Supplements for more information on the qualifications of our Firm and our representatives.

Item 2: Material Changes

Hobart Private Capital, LLC (“Hobart,” “our,” “we” and “Firm”) is required to prepare a disclosure document such as this one, commonly referred to as a “Wrap Fee Program Brochure,” (“Wrap Brochure”) that describes our Wrap Fee Program. This document serves as Appendix 1 to our Firm Brochure (Part 2A of Form ADV). We are required to amend our Wrap Brochure at least annually and provide clients and prospective clients with a summary of any material changes since the previous annual amendment. In this section we only discuss material changes since the last annual update of our brochure.

This version of our Wrap Brochure dated April 6, 2020 is our annual updating amendment. The following are the material changes since our annual update of March 31, 2019:

- Hobart has revised Item 4 – Advisory Business to provide additional details regarding the conflicts of interest involved with the recommendation of securities and insurance products to our clients by our investment adviser representatives who are also registered representatives of a broker-dealer and licensed insurance agents. We have further revised Item 4 to disclose that most of our representatives who are insurance licensed have additional financial incentives in the form of bonuses for reaching annual and quarterly for insurance issued and assets under management for advisory accounts. For more information regarding these conflicts, as well as how they are addressed, please see Item 4.
- Hobart also revised Item 4 – Advisory Business to describe our non-discretionary asset management services.
- We have revised Item 9 – Additional Information, to reflect the changes made to Item 4 regarding the conflicts of interest involved with the recommendation of securities and insurance products to our clients by our investment adviser representatives who are also registered representatives of a broker-dealer and licensed insurance agents. Please see Items 4 and 9 for more information.
- We have further revised Item 9 to indicate that while brokerage assets may be reflected on account statements, these assets are not included in calculation of our management fee, nor are these assets managed by HPC.
- Hobart has revised Item 9 – Additional Information - to indicate that some of our investment adviser representatives are also currently registered representatives of Cape Securities, Inc, Member FINRA, a non-affiliated registered broker-dealer (CRD #7072) and to disclose the conflict associated with that relationship. For more information, please see Item 9.
- We have also revised Item 9 to describe the conflict of interest that exists when our investment adviser representatives recommend commissionable insurance or securities products to existing advisory clients. For more information, please see Item 9.
- In Item 4 – Services, Fees & Compensation - we have simplified the terminology we use to describe third parties that are engaged by you on our recommendation, or by us directly on your behalf, to assist in the management of your account(s). While these third parties may sometimes be known by different names such as “Sub-Advisers,” “Money Managers,” or “Third-Party Managers,” we will generally refer to them in this Wrap Brochure as “Third-Party Managers” unless the context suggest

we should be more specific. Additionally, we will use the term “Platform Provider” to describe third parties that make Third-Party Managers, custodians, software and other tools available to us through an investment platform, unless the context suggests we should be more specific. We have amplified our discussion of how we use Third-Party Managers and Platform Providers.

- We have also revised Item 4, under the subheading “Allocation of Assets to Third-Party Advisors,” to explain that Hobart now intends to utilize the investment platform offered by AssetMark, LLC (“AssetMark”). The revisions describe services offered by AssetMark, our relationship with AssetMark, the methods by which AssetMark’s services are provided, and other material details regarding the AssetMark Platform. For more information, see Item 4.
- We have further revised Item 4 to describe the platform fees, custody fees, sub-advisory fees, and other costs associated with assets that are managed via the AssetMark Platform. This description contains a discussion of conflicts of interest that are material to clients’ consideration. The revised portion of Item 4 also explains the charges that Hobart pays to AssetMark for participation in the AssetMark Platform. For more information, please see Item 4.
- We have further revised Item 4 to explain conflicts of interest that attend our decision to recommend that a Third-Party Manager be used to manage a client’s account, as opposed to recommending that we manage the client’s account without the use of a Third-Party Manager. For further information, please see Item 4.
- Hobart has further revised Item 4 to explain that, while generally Hobart is responsible for payment of transaction fees, certain situations involving the use of the AssetMark Platform may result in Hobart having to pay no additional transaction fees. In these situations, the transaction costs are covered by the Platform Fee charged by AssetMark. This arrangement and the conflict of interest created by it are discussed in Item 4. For more information, please see Item 4.
- We have revised Item 9 – Additional Information - to describe certain financial payments, allowances, products, services and other benefits that Hobart will receive from AssetMark by virtue of managing clients’ assets via the AssetMark Platform. Receipt of these payments, products, services, and similar benefits create conflicts of interest which are material to clients’ consideration. For more information, please see Item 9.
- We have further revised Item 9 to describe non-monetary compensation received for conducting business through Advisors Excel and the conflicts of interest relating to that compensation. For more information, please see Item 9.

Annually, we will ensure that you receive either an amended brochure or a summary of any material changes to this and any subsequent Wrap Brochure within 120 days of the end of our fiscal year, and promptly at any time if any of the information herein becomes materially inaccurate.

We will deliver a complete copy of our Wrap Brochure upon your request at any time during the year. Please contact our Chief Compliance Officer, Thomas Hamilton, at (888) 553-0123 or via email at Info@HobartFinancialGroup.com to request a Wrap Brochure.

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Item 4: Services, Fees & Compensation

Our Firm is a Charlotte based investment adviser that primarily provides individuals, high net worth individuals and other types of clients with discretionary investment advisory services. We became registered with the U.S. Securities and Exchange Commission on February 29, 2016. Prior to that we maintained registration with the North Carolina Securities Division. Our Firm is a limited liability company formed under the laws of the State of North Carolina in 2013, the day we began operations. Our Firm is wholly owned by Christopher S. (Chris) Hobart, who also serves as Managing Member, President and Chief Executive Officer. Thomas Hamilton is the Firm's Chief Compliance Officer.

We provide investment advisory services on a wrap fee basis. The client will pay us a single wrap fee and we will pay or reimburse the trading and custody costs of the custodian and broker-dealer. This Wrap Brochure (Appendix 1 to Form ADV Part 2A) specifically describes our Wrap Program asset management services. For other services, please refer to our Firm Brochure (Form ADV Part 2A).

Because of the nature of the Wrap Program, the wrap client may pay more or less than if the client were able to compensate us outside of the Wrap Program. For example, if a client's account is rarely traded, the transaction fees the client would have paid would be minimal, thus limiting the benefits of "wrapping" management fees and transaction fees. We receive the wrap fee for our services. We pay transaction fees to various broker-dealers, mutual funds and ETFs. The remainder of the wrap fee is the net management fee payable to us. The single wrap fee charged by Hobart is customarily referred to as the "Advisory Fee." The amount payable to us varies depending upon the amount of trading in a client's account. The more transactions in the account, the greater the amount of transaction fees, and therefore the less compensation to us. Accordingly, we have a financial incentive to avoid trading the account. This creates a conflict of interest between the Firm and its Wrap Program clients. We attempt to mitigate this conflict by requiring that the Firm's employees acknowledge their fiduciary duty to place client interests ahead of their own and through review of client accounts.

Our Wrap Advisory Services

Wrap Asset Management Services:

We manage clients' assets primarily on a discretionary basis pursuant to our Investment Advisory Agreement. That agreement contains important details regarding, among other things, our obligations to you and the costs to you of the management of your accounts. As part of our Wrap Asset Management service, a portfolio is created, potentially including individual stocks, bonds, exchange traded funds ("ETFs"), options, mutual funds and other public and private securities or investments. The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Portfolios will be designed to meet a particular investment goal, which we have determined to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, portfolios are continuously and regularly monitored, and if necessary, rebalanced based upon the client's individual needs, stated goals and objectives. We will meet with clients periodically to review the performance of the account and determine whether any changes should be made.

We also offer asset management services on a non-discretionary basis. When a client engages us to provide asset management services on a non-discretionary basis, we monitor the accounts in the same way as for discretionary services. The difference is that changes to the client's account will not

be made until we have confirmed with the client (either verbally or in writing) that our proposed change is acceptable to the client.

Allocation of Assets to Third-Party Money Managers:

Our Firm may utilize the services of various third-party investment advisory firms, including Sub-Advisers, Money Managers, and Third-Party Managers (collectively referred to herein as “Third-Party Managers”), to aid in the implementation of an investment portfolio. Before selecting a Third-Party Manager, our Firm will ensure that the chosen Third-Party Manager is properly licensed or registered as required. We will also conduct other due diligence on these managers as well as ongoing reviews of their management of client accounts. In order to assist in the selection of a Third-Party Manager, our Firm will gather client information pertaining to financial situation, investment objectives, and reasonable restrictions to be imposed upon the management of the account.

We almost always use a “Platform” to manage clients’ assets. A Platform is a system offered by a third-party, through which we obtain access to custodians, Third-Party Managers, and other tools, products or services that aid us in managing your account. Traditionally, we have used the Platform offered by Global Financial Private Capital (“Global”). In April 2019, Global was purchased by AssetMark, LLC (“AssetMark”). The Global Platform remains in operation, and it is that Platform that we use to manage most of our accounts. We anticipate moving clients’ accounts to AssetMark’s Platform in the future. Third-Party Managers are made available to us through both the Global and the AssetMark Platforms.

Under the Global Platform, pursuant to a Sub-Adviser Agreement between us and Global, we pay a sub-adviser fee to Global that covers both the cost of participating in the Platform and the costs of any Third-Party Manager. Under the AssetMark Platform, each client will execute, at our request, a separate Client Services Agreement with AssetMark that authorizes participation on the Platform. Hobart assists the client in selecting the risk/return objective and Third-Party Managers that best suit the clients’ risk profile and investment objectives. Although we have authority to implement investments in our clients’ accounts, for those clients in which we recommend a Third-Party Manager, we will usually request that the client specifically direct the account to be invested in accordance with the chosen investment solution with a specific Third-Party Manager. After that, the account will be managed directly by the Third-Party Manager under our supervision. The Third-Party Manager will make any changes to the holdings or allocations that manager deems appropriate in the account(s). This client authorization also results in the purchase and sale of securities without further authorization by the client or any party at such time as the Third-Party Manager changes the composition of the selected model asset allocation.

We will review the management of the selected Third-Party Manager on an ongoing basis. Furthermore, we may, without further input from or permission of the client, move client assets from one Third-Party Manager to another, terminate the services of a Third-Party Manager with respect to a client, or reallocate client assets between Third-Party Managers.

Our Firm will review Third-Party Manager reports provided to the client at least annually. We will also contact clients from time to time in order to review their financial situation and objectives; communicate information to Third-Party Managers as warranted; and, assist the client in understanding and evaluating the services provided by the Third-Party Manager. Clients will be expected to notify our Firm of any changes in their financial situation, investment objectives, or account restrictions that could affect their financial standing.

Until such time as we begin managing clients' assets via the AssetMark Platform, we will continue to use the Global Platform. Except as otherwise explained in this Wrap Brochure, the descriptions of AssetMark, its services and charges, are also applicable to Global.

Information regarding AssetMark and its Platform can be found in the AssetMark Platform Disclosure Brochure. Likewise, information about Global and its Platform can be found in Global's Brochure. There, among other things, clients can read about the account minimums applicable to Third-Party Managers or other investment programs available on the Platforms. Hobart may have the ability to negotiate lower account minimums.

Retirement Plan Rollovers:

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If we are asked by a client or prospective client to make a recommendation from among these choices, we have a conflict of interest in that we have an incentive to recommend that a client roll over their retirement plan assets into an account to be managed by the Firm. Such a recommendation creates a conflict of interest as we will earn a new (or increase our current) advisory fee as a result of the rollover. We address this conflict of interest by reviewing any such recommendation to ensure it is in the best interest of the client. No client is under any obligation to accept our recommendation or to roll over retirement plan assets to an account managed by us.

Conflicts of Interests Regarding Securities and Insurance Products that Pay Commissions:

Some of our investment adviser representatives are also registered representatives of a broker-dealer. Whenever any such representative recommends that a client purchase a security product through the broker-dealer, the representative is recommending a product on which he or she will receive a commission. Additionally, while our representatives have a fiduciary duty to clients with respect to investment advice provided through HPC, they do not have a fiduciary duty with respect to the recommendation of securities products. They are required, however, only to recommend securities products or transactions that are in the client's best interest.

Our representatives are also individually licensed insurance agents. Whenever any such representative recommends that a client purchase an insurance product, the representative is recommending a product on which he or she will receive a commission. Additionally, while our representatives are required to act in your best interest when providing investment advice or recommending the purchase of securities, they are not required to act in your best interest in recommending insurance products.

PLEASE BE AWARE THAT MOST OF OUR INDIVIDUAL REPRESENTATIVES WHO ARE ALSO INSURANCE LICENSED HAVE ADDITIONAL FINANCIAL INCENTIVES IN THE FORM OF BONUSES THAT WILL BE PAID BY HOBART FINANCIAL GROUP IF THEY REACH CERTAIN ANNUAL AND QUARTERLY GOALS FOR INSURANCE ISSUED AND ASSETS UNDER MANAGEMENT FOR ADVISORY ACCOUNTS.

BECAUSE TWO CATEGORIES OF GOALS ARE TIED TO THE DOLLAR VOLUME OF INSURANCE PRODUCTS ISSUED, THE REPRESENTATIVE HAS A CLEAR AND DIRECT INCENTIVE TO RECOMMEND INSURANCE PRODUCTS TO REACH THOSE GOALS, EVEN IN SITUATIONS WHERE

SUCH PRODUCTS MAY BE UNSUITABLE FOR THE CLIENT. THIS INCENTIVE CREATES A CONFLICT OF INTEREST WITH RESPECT TO THE INDIVIDUAL ADVISOR'S COMPENSATION.

IN CERTAIN OTHER CIRCUMSTANCES, SOME INDIVIDUAL ADVISORS OF HPC HAVE A FINANCIAL INCENTIVE TO RECOMMEND ONE FORM OF INSURANCE PRODUCT OVER ANOTHER, EVEN WHEN SUCH A RECOMMENDATION MAY NOT BE IN THE CLIENT'S BEST INTEREST. MORE SPECIFICALLY, THERE ARE SEPARATE GOALS FOR ANNUITIES AND LIFE INSURANCE PRODUCTS. SINCE THE REPRESENTATIVE'S COMPENSATION WILL BE HIGHER IF BOTH OF THOSE SEPARATE GOALS ARE MET, THE ADVISOR IS INCENTIVIZED TO RECOMMEND THE PRODUCT THAT IS MOST LIKELY TO RESULT IN HIM OR HER REACHING BOTH GOALS. FOR EXAMPLE, IF A REPRESENTATIVE HAS ALREADY MET THE GOAL FOR ANNUITIES, BUT HASN'T MET THE GOAL FOR LIFE INSURANCE, HE OR SHE WILL HAVE A FINANCIAL INCENTIVE TO RECOMMEND A LIFE INSURANCE PRODUCT IN ORDER TO MEET THAT GOAL. THIS INCENTIVE CREATES A CONFLICT OF INTEREST WITH RESPECT TO THE INDIVIDUAL ADVISOR'S COMPENSATION.

IN CERTAIN OTHER CIRCUMSTANCES, SOME INDIVIDUAL ADVISORS OF HPC HAVE A FINANCIAL INCENTIVE TO RECOMMEND THAT CLIENTS CONTRIBUTE FUNDS OR SECURITIES TO BE MANAGED BY HPC PURSUANT TO AN INVESTMENT ADVISORY AGREEMENT, EVEN WHEN SUCH A RECOMMENDATION MAY NOT BE IN THE CLIENT'S BEST INTEREST. SPECIFICALLY, THERE ARE SEPARATE GOALS FOR LIFE INSURANCE PRODUCTS AND ASSETS UNDER MANAGEMENT. SINCE THE REPRESENTATIVE'S COMPENSATION WILL BE HIGHER IF ALL OF THOSE SEPARATE GOALS ARE MET, THE ADVISOR IS INCENTIVIZED TO RECOMMEND THE PRODUCT OR SERVICE THAT IS MOST LIKELY TO RESULT IN HIM OR HER REACHING ALL GOALS. FOR EXAMPLE, IF A REPRESENTATIVE HAS ALREADY MET THE GOALS FOR ONE OR BOTH OF THE INSURANCE PRODUCTS BUT HASN'T MET THE GOAL FOR ASSETS UNDER MANAGEMENT, HE OR SHE WILL HAVE A FINANCIAL INCENTIVE TO RECOMMEND ADVISORY SERVICES (ASSETS UNDER MANAGEMENT) IN ORDER TO MEET THAT GOAL. THIS INCENTIVE CREATES A CONFLICT OF INTEREST WITH RESPECT TO THE INDIVIDUAL ADVISOR'S COMPENSATION.

ADDITIONALLY, THE BONUS PROGRAM WAS ESTABLISHED BY AND IS ADMINISTERED THROUGH HOBART FINANCIAL GROUP. HOBART FINANCIAL GROUP AND HOBART INSURANCE SERVICES, LLC, WILL ALSO BENEFIT IF INDIVIDUAL ADVISORS MEET THEIR GOALS. THIS ALSO REPRESENTS A CONFLICT OF INTEREST.

WE ADDRESS THESE CONFLICTS OF INTEREST BY (1) MAKING SURE ALL CLIENTS ARE ADVISED OF THIS CONFLICT THROUGH CONSPICUOUS DISCLOSURE IN THIS BROCHURE; (2) REQUIRING ALL REPRESENTATIVES TO ASSURE THAT ANY RECOMMENDATIONS OF INSURANCE PRODUCTS OR RECOMMENDATIONS FOR ASSET MANAGEMENT ARE IN THE CLIENT'S BEST INTEREST AND SUITABLE FOR THE CLIENT; (3) REQUIRING ALL ADVISORS TO SIGN A WRITTEN AGREEMENT SPECIFYING THAT, AS A CONDITION FOR RECEIPT OF ANY BONUS, ALL COMPLIANCE PAPERWORK (INCLUDING SUITABILITY DOCUMENTATION) BE SUBMITTED TO THE COMPLIANCE DEPARTMENT; AND (4) SUBJECTING ALL RECOMMENDATIONS TO THOROUGH REVIEW BY THE CCO OR HIS/HER DEISGNEE, FOR A DETERMINATION THAT THE RECOMMENDATION IS CONSISTENT WITH THE CLIENT'S RISK TOLERANCE AND IN FACT IN THE CLIENT'S BEST INTEREST AND SUITABLE FOR THE CLIENT.

Not all our representatives are licensed to make all of these types of recommendations, nor do all representatives who are licensed to recommend these products do so for all clients. The "Brochure

Supplement” you have received for your representative indicates whether the representative is securities licensed, insurance licensed or both.

Please be aware that even if you agree to follow a representative’s recommendation regarding a securities product or transaction, or an insurance product, you do not have to purchase the product through the representative, or through Hobart Insurance Services, LLC. Rather, you can purchase the product through another broker-dealer or another insurance agency or representative.

Fees and Compensation for Our Advisory Services

This section provides additional details regarding our Firm’s services along with descriptions of each service’s fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be described in the agreement between you and Hobart.

Wrap Asset Management Services:

Under the Wrap Program, we are able to offer participants investment management services, including our service in arranging for and paying transaction charges, under a single specified annual type of fee called a “wrap fee.” The wrap fee also covers custody, reporting, and investment management. To avoid confusion, we will refer to the wrap fee charged by Hobart as the Advisory Fee. Advisory Fees are negotiable and will be deducted from client account(s). In rare cases, our Firm will agree to bill clients directly rather than deduct fees from the client’s account.

For those clients whose Advisory Fees are deducted by us:

- a) Clients will provide authorization permitting our Firm to be directly paid; and
- b) The client’s independent custodian sends statements at least quarterly showing the market values for each security included in the account and all account disbursements, including the amount of the advisory fees paid to our Firm.

In the event that our Firm employs the services of Third-Party Managers in connection with our provision of wrapped asset management services, the Advisory Fee consists of two components: (a) a base amount for services we provide (the “HPC Advisory Fee”), plus where applicable, and (b) the amount charged by the Third-Party Manager (“Third-Party Management Fee”) or Platform Provider (“Platform Fee”). Until we move our clients’ assets to the AssetMark Platform, those assets continue to be managed within the Global Platform. The client’s total Advisory Fee under the Global Platform consists of the HPC Advisory Fee plus the Sub-Adviser Fee we pay to Global. The Sub-Adviser Fee covers the cost of both the Global Platform and the Third-Party Managers. After we move clients’ accounts to AssetMark, fees for the Third-Party Managers and for AssetMark’s services will be paid in the form of a cumulative “Platform Fee.” The client will not be charged additionally for those services.

The Third-Party Manager Fee or Platform Fee is disclosed in a separate disclosure delivered to the client at or before the time the assets are designated to be managed by that Third-Party Manager. Clients will be provided with a copy of the chosen Third-Party Manager’s Form ADV Part 2A, all relevant Brochures, and the Third-Party Manager’s privacy policy notice. Please note that, because we have negotiated lower rates from Platform Providers, the rates charged to our clients will not necessarily be the standard rates shown on that Platform Provider’s Brochure. Rather, the rate on the disclosure form received from us will be applicable.

The maximum annual Advisory Fee charged will not exceed 2.50%. The actual Advisory Fee to be assessed will be described in the Investment Advisory Agreement to be signed by the client and our Firm. Except as otherwise described below, Advisory Fees are billed quarterly, in advance, based on the value of the account(s) on the last day of the previous quarter. We authorize the Platform Provider to collect the Advisory Fee, which includes the HPC Advisory Fee. For purposes of determining the client's assets under management, any accounts owned by members of client's household may, at the option of the Firm, be aggregated. Please note that some client assets may be considered "assets under management" for purposes of calculating our fee even though they would not be considered "assets under management" for purposes of regulatory reporting as referenced in Item 4 of this Brochure.

Each quarterly fee is calculated by dividing the number of days in the quarter by 365 and multiplying the quotient by the quarterly fair market value described above. Advisory Fees for services during the initial quarter in which the account is opened shall be a prorated fee calculated according to the days remaining in the quarter when the account is opened. The Advisory Fee on amounts deposited during a quarter are assessed at the quarter beginning of the month following the month in which the deposit was made. The fee charged on such a deposit is calculated by dividing the number of days remaining in the quarter by the total days in the quarter and multiplying the quotient by the quarterly fee derived by the process described. On the AssetMark Platform, credits for withdrawals made during a quarter will not be issued. This differs from the way Advisory Fees are charged on the Global Platform, where the client does receive a credit against the fees for withdrawals made during a quarter.

Under the AssetMark Platform Agreement between our Firm and AssetMark, the Platform Fee charged to Hobart will vary depending on the Third-Party Managers used. Furthermore, because of the volume of accounts or cumulative value of assets managed on the Platform, Hobart has received preferential pricing with respect to the Platform Fees for assets allocated to most Third-Party Managers. Hobart is required to maintain at least \$82,036,857.63 in assets allocated to Third-Party Managers on the AssetMark Platform in order to continue to receive the preferential pricing. Hobart believes this arrangement will benefit its clients, since keeping platform costs low also helps to keep the client's Advisory Fee low. However, it does create a conflict of interest in that the existence of a minimum asset maintenance requirement creates an incentive for Hobart to continue managing clients' assets on the AssetMark Platform rather than some other platform or with a different custodian or Third-Party Manager. Hobart will manage that conflict by periodically evaluating and assessing whether maintaining assets on the AssetMark Platform is in the clients' best interest, taking into consideration the quality of the services provided by AssetMark for the clients' benefit, or available to Hobart via the Platform in connection with services Hobart provides to its clients, costs to the client and other factors.

Additionally, we expect AssetMark to offer us a way to invest our clients in "Multi-Strategy Accounts" in the future. In some of those Multi-Strategy Accounts, the requirement that Hobart pay the transaction charges relating to clients' accounts will be eliminated. Although we do not yet know the details, this will create a conflict of interest in that we will have an incentive to specify that clients' accounts be managed through Multi-Strategy Accounts rather than through non- Multi-Strategy Accounts, in order to avoid the transaction costs. We will develop methods to manage and avoid that conflict at the appropriate time, with a critical component of such strategy being to assure that a recommendation to a client to participate in a Multi-Strategy Account must be in the client's best interest.

Fees for accounts managed by Third-Party Manager AE Wealth Management, LLC are billed monthly in arrears. Those fees are based on each account's average daily balance during the prior calendar

month. Fees are prorated for accounts opened during the month. Fees shall become payable on the last day of the calendar month, or, in the event of termination of services, on the day following termination. If the management of the account(s) commences at any other time than the beginning of the month, the first monthly fee shall be prorated based on the portion of such month remaining.

Hobart has a conflict of interest in that it will only use or recommend Third-Party Managers, Platform Providers or other third-party investment advisers that have a relationship with Hobart and have met the conditions of our due diligence review. There may be other providers that may be suitable that we do not have a relationship or that may be more or less costly. To address this conflict, we consider the best interests of clients in Third-Party Managers and Platform Providers. You are under no obligation to utilize the services of the Third-Party Managers or Platform Providers we recommend. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

Platform Fee For Accounts Managed Without Use of Third-Party Manager:

With respect to all accounts managed by Hobart directly on the AssetMark and Global Platforms, that is, without the use of a Third-Party Manager, Hobart must pay a Platform Fee of 0.12% of assets under management in order to use the AssetMark Platform with respect to the Account. This creates a conflict of interest with respect to the Hobart managed accounts, in that Hobart has an incentive to use Third-Party Managers in order to avoid having to incur the additional 0.12% costs. This conflict of interest is ameliorated by the fact that the costs to Hobart of administration and supervision of accounts managed by Third-Party Managers is significantly higher than those same costs with respect to accounts managed without the use of Third-Party Managers. Hobart seeks to further minimize or eliminate the conflict by assuring that the decision whether or not to recommend a Third-Party Manager is in the client's best interest.

Other Types of Fees and Expenses:

The fees not included in the advisory fee for our wrap services are charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, ADR fees and other fees and taxes on brokerage accounts and securities transactions. Furthermore, clients are responsible for all transaction fees and charges incurred when placing unsolicited orders directly on the custodian's website, pursuant to the agreement with the custodian.

Item 5: Account Requirements & Types of Clients

Hobart generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Pension and profit-sharing plans
- Trusts, estates, or charitable organizations

Our Firm generally requires that new clients have a minimum liquid net worth of \$250,000 for our Wrap Asset Management service. This minimum requirement is generally negotiable. Our Firm does not generally impose any other requirements for opening and maintaining accounts or otherwise engaging us.

Item 6: Portfolio Manager Selection & Evaluation

Selection of Portfolio Managers:

Our Firm's investment adviser representatives ("IAR"s) act as portfolio manager(s) for this wrap fee program. A conflict arises in that other investment advisory firms may charge the same or lower fees than our Firm for similar services. Our IARs are subject to individual licensing requirements as imposed by state securities boards. Our Firm is required to confirm or update each IAR's Form U4 on an annual basis. IAR supervision is conducted by our Chief Compliance Officer or management personnel.

Advisory Business:

Information about our wrap fee services can be found in Item 4 of this Wrap Brochure. Our Firm offers individualized investment advice to our Wrap Asset Management clients.

Each Wrap Asset Management client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

Performance-Based Fees & Side-By-Side Management:

Our Firm does not charge performance-based fees or engage in side-by-side management of accounts.

Methods of Analysis:

Hobart may use the following methods of analysis in formulating investment advice:

Charting - This is a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Charting is likely the most subjective analysis of all investment methods since it relies on proper interpretation of chart patterns. The risk of reliance upon chart patterns is that the next day's data can always negate the conclusions reached from prior days' patterns. Also, reliance upon chart patterns bears the risk of a certain pattern being negated by a larger, more encompassing pattern that has not shown itself yet.

Cyclical - This method analyzes the investments sensitive to business cycles and whose performance is strongly tied to the overall economy. For example, cyclical companies tend to make products or provide services that are in lower demand during downturns in the economy and in higher demand during upswings. Examples include the automobile, steel, and housing industries. The stock price of a cyclical company will often rise just before an economic upturn begins and fall just before a downturn begins. Investors in cyclical stocks try to make the largest gains by buying the stock at the bottom of a business cycle, just before a turnaround begins.

While most economists and investors agree that there are cycles in the economy that need to be respected, the risk is that the duration of such cycles is generally unknown. An investment decision to buy at the bottom of a business cycle may actually turn out to be a trade that occurs before or after

the bottom of the cycle. If done before the bottom, then downside price action can result prior to any gains. If done after the bottom, then some upside price action may be missed. Similarly, a sell decision meant to occur at the top of a cycle may result in missed opportunity or unrealized losses.

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

There are risks involved in using any analysis method.

To conduct analysis, Hobart gathers information from financial newspapers and magazines, inspection of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses and filings with the SEC, and company press releases.

Investment Strategies We Use:

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long term purchases – Investments held at least a year.

Short term purchases – Investments sold within a year.

Frequent trading – This strategy refers to the practice of selling investments within 30 days of purchase. Frequent trading can have a significant impact on investment performance, particularly through increased brokerage and other transaction costs and taxes.

Margin transactions – When an investor buys a stock on margin, the investor pays for part of the purchase and borrows the rest of the purchase price from a brokerage firm. For example, an investor may buy \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. Clients cannot borrow stock from Hobart. Clients who trade securities on margin incur the potential for higher losses. The brokerage firm has the ability to liquidate margined securities without further notice to you in order to meet its maintenance margin requirements, and clients will be responsible for any short fall in the account after such a sale. Furthermore, margin accounts generally have fairly high interest rates.

Option writing including cover options, uncovered options or spreading strategies – Options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.

In advising clients via the AssetMark or Global Platforms, Hobart may select from mutual funds, exchange traded funds (ETFs), individual stocks, bonds and other investment solutions offered on the Platform. These solutions are provided by a number of institutional investment strategists and based on the information, research, asset allocation methodology and investment strategies of those institutional strategies.

Risk of Loss:

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our Firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.

- **Equity (Stock) Market Risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk** – When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced
- **Fixed Income Risk** – When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **Options Risk** – Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- **ETF and Mutual Fund Risk** – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- **Management Risk** – Your investment with our Firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Voting Client Securities:

Our Firm does not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our Firm, our Firm will forward them to the appropriate client and ask the party who sent them to mail them directly to the client in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Third-Party Managers selected or recommended by our Firm may vote proxies for clients. Therefore, except in the event a Third-Party Manager votes proxies, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Therefore (except for proxies that may be voted by a Third-Party Manager), our Firm and/or the client shall instruct the qualified custodian to forward to copies of all proxies and shareholder communications relating to the client's investment assets.

Item 7: Client Information Provided to Portfolio Manager(s)

All accounts managed by Hobart directly are managed by our in-house licensed IARs. The IAR selected to manage the client's account(s) or portfolio(s) will be privy to the client's investment goals and objectives, risk tolerance, restrictions placed on the management of the account(s) or portfolio(s) and relevant client notes taken by our Firm. Please see our Firm's Privacy Policy for more information on how our Firm utilizes client information.

Item 8: Client Contact with Portfolio Manager(s)

Clients are always free to directly contact their portfolio manager(s) with any questions or concerns about their portfolios or other matters.

Item 9: Additional Information

Disciplinary Information

Our Firm is required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of its advisory business or the integrity of its management personnel. We do not have any required disclosures to report in response to this Item.

Financial Industry Activities & Affiliations

Some investment adviser representatives of our Firm are also currently registered representatives of Cape Securities, Inc, Member FINRA, a non-affiliated registered broker-dealer (CRD #7072). Whenever any such representative recommends that a client purchase a security product through the broker-dealer, the representative is recommending a product on which he or she will receive a commission. Not all our representatives are licensed to make all of these types of recommendations, nor do all representatives who are licensed to recommend these products do so for all clients. The "Brochure Supplement" you have received for your representative indicates whether the representative is securities licensed.

Any time any such recommendation is made that you purchase a security through the broker-dealer, the representative will receive a commission if the recommendation is followed. Additionally, while our representatives have a fiduciary duty to clients with respect to investment advice provided through HPC, they do not have a fiduciary duty with respect to the recommendation of securities products. They are required, however, only to recommend securities products or transactions that are in the client's best interest. Please be aware that even if you agree to follow a representative's recommendation, you do not have to purchase the product through the representative. Rather, you can purchase the product through another broker-dealer or representative.

The recommendation of these products presents a conflict of interest, in that our representatives have a financial incentive to recommend products based on the commission amount received rather than on the client's needs. We manage this conflict of interest by describing it in this brochure and by reviewing any such proposed transaction to determine whether it is in the client's best interest. We further require all representatives to seek prior approval of any outside employment activity so that we may ensure that any conflicts of interest in such activities are properly disclosed, and fully disclose to a client when a particular transaction will result in the receipt of commissions or other associated fees.

Beginning July 1, 2019, Hobart IARs have an added incentive to recommend commissionable securities products to their clients because of the way Hobart compensates its IARs for investment advisory business. Specifically, IARs are only compensated based on the value of assets held in an advisory account for a period of approximately one year. This is a conflict of interest. To ameliorate this conflict, Hobart will review every recommendation by its IARs for existing clients to purchase securities products to ensure the recommendation is in the best interest of the client.

Chris Hobart also owns a state-licensed affiliated insurance agency, Hobart Insurance Services, LLC ("Hobart Insurance"). Hobart Insurance is licensed to offer insurance products in the state of North Carolina. The insurance products that Hobart Insurance will provide include life insurance, long-term care, group life, and fixed annuities. Many of these insurance products are offered through separate and distinct vendors.

As an insurance agency, Hobart Insurance will receive separate, yet customary compensation for insurance product issuance. Our representatives are also individually licensed insurance agents. Whenever any such representative recommends that a client purchase an insurance product, the representative is recommending a product on which he or she will receive a commission. Additionally, while our representatives are required to act in your best interest when providing investment advice or recommending the purchase of securities, they are not required to act in your best interest in recommending insurance products.

Not all our representatives are licensed to make all of these types of recommendations, nor do all representatives who are licensed to recommend these products do so for all clients. The “Brochure Supplement” you have received for your representative indicates whether the representative is insurance licensed.

Any time any such recommendation is made that you purchase an insurance product, the representative will receive a commission if the recommendation is followed. Furthermore, our representatives are not required to act in your best interest when recommending insurance products. Please be aware that even if you agree to follow a representative’s recommendation, you do not have to purchase the product through the representative. Rather, you can purchase the product through another insurance agency or representative.

Acting in dual capacities (insurance agency and investment advisor) and receiving compensation as such, creates conflicts of interest. Furthermore, the recommendation of these products by our representatives presents a conflict of interest, in that our representatives have a financial incentive to recommend products based on the commission amount received rather than on the client’s needs. Our representatives have additional financial incentives in the form of bonuses for reaching certain annual and quarterly goals for insurance issued and assets under management, as more fully described above in Item 4.

We manage these conflicts of interest by describing them in this brochure, and by reviewing any such proposed transaction to determine whether it is in the client’s best interest and suitable for the client. We further require all representatives to seek prior approval of any outside employment activity so that we may ensure that any conflicts of interest in such activities are properly disclosed, and fully disclose to a client when a particular transaction will result in the receipt of commissions or other associated fees.

Beginning July 1, 2019, Hobart IARs have an added incentive to recommend commissionable insurance products to their clients because of the way Hobart compensates its IARs for investment advisory business. Specifically, IARs are only compensated based on the value of assets held in an advisory account for a period of approximately one year. This is a conflict of interest. To ameliorate this conflict, Hobart will review every recommendation by its IARs for existing clients to purchase insurance products to ensure the recommendation is in the best interest of the client.

Hobart Financial Group, Inc. (“HFG”) is a holding company and is the sole owner of Hobart Insurance. HFG, which is wholly-owned by Chris Hobart, also acts as an umbrella brand for all of the Hobart affiliated companies. For example, our Firm’s advisory services are described on HFG’s web site along with the services of Hobart Insurance. HFG also provides certain administrative and back-office services to the Hobart affiliated companies under an internal cost sharing arrangement.

Chris Hobart provides coaching services to other financial professionals, including insurance agents. In providing these services he uses the name Hobart Coaching and Consulting. These services typically consist of speaking events discussing topics such as practice management. If as a result of

Mr. Hobart's coaching services these insurance agents write insurance business with Advisors Excel, LLC ("Advisors Excel"), a non-affiliated insurance agency, Mr. Hobart receives a portion of the revenue. This could present a conflict of interest if these insurance products were issued to clients of Hobart. None of these other insurance agents work with Hobart clients at this time.

Advisors Excel also sponsors and hosts programs, conferences and other trips that are available to agents who place insurance business through Advisors Excel. For many of these trips Advisors Excel pays or reimburses travel-related costs of Hobart Insurance personnel, including Hobart representatives and their spouses. This practice could be considered a form of non-monetary compensation for placing business on the Advisors Excel Platform, and creates a conflict of interest in that it incentivizes Hobart Insurance to use that Platform. Hobart and Hobart Insurance seek to minimize the impact of these conflicts by regularly assessing the availability, comparative costs and comparative services of alternative platforms that could provide the same services as Advisors Excel, without regard to the receipt of travel and other non-monetary compensation.

In addition, our Firm may direct clients to Third-Party Managers. We will always act in the best interests of the client, including when recommending a Third-Party Manager. Hobart has a conflict of interest in that it will only use or recommend Third-Party Managers or other third-party investment advisers that have a relationship with Hobart and have met the conditions of our due diligence review. There may be other Third-Party Managers that may be suitable that we do not have a relationship or that may be more or less costly. To address this conflict, we consider the best interests of clients in selecting Third-Party Managers. You are under no obligation to utilize the services of the Third-Party Managers we recommend. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered. See Item 4 for more information.

The Premier Business Builder Development Allowance:

Hobart has elected to participate in a program sponsored by AssetMark called the "Premier Business Builder Development Allowance" program ("BDA Program"), under which AssetMark will reimburse Hobart the cost of certain qualifying marketing or practice management expenses incurred by Hobart on a quarterly basis. Hobart also expects to receive an additional one-time payment of \$20,000 from AssetMark by entering into a Platform Agreement and intending to manage client assets on the AssetMark Platform.

Furthermore, the level of assets Hobart elects to manage using the AssetMark Platform materially impacts the amounts of reimbursement payments we will receive under the BDA program. Specifically, the payments to be received by Hobart under the BDA Program increase with the amount of assets managed by Hobart via the AssetMark Platform. Hobart expects to receive material sums in the form of reimbursement as long as we continue to participate in the BDA Program.

Both the one-time payment and our continued participation in the BDA Program create a conflict of interest in that Hobart has an incentive to continue managing assets via the AssetMark Platform in order to receive the payment or reimbursements. Hobart manages that conflict by periodically evaluating and assessing whether maintaining assets on the AssetMark Platform is in the client's best interest, taking into consideration the quality of the services provided by AssetMark for the clients' benefit, or available to Hobart via the Platform in connection with services Hobart provides to its clients, costs to the client and other factors.

AssetMark sponsors annual conferences for participating financial advisory firms and/or financial advisors designed to facilitate and promote the success of the firm, the adviser or AssetMark.

AssetMark offers portfolio strategists (including Third-Party Managers) and other financial industry firms the opportunity to contribute to the costs of AssetMark's annual conferences and be identified as a sponsor. AssetMark also covers travel-related expenses for certain financial advisors to attend AssetMark's annual conferences, quarterly meetings, or to conduct due diligence visits. Hobart personnel and Hobart representatives have participated in these events and likely will participate in future events. In addition to and outside of the DBA Program, AssetMark contributes to the costs incurred by certain advisers, including Hobart representatives, in connection with conferences and other events. AssetMark also solicits research from financial advisors regarding new products or services that AssetMark is considering for clients such as Hobart. In exchange for this feedback and guidance, AssetMark may offer an incentive to the financial advisor for their attendance at, or participation in, for example, a survey or focus-group. These types of arrangements create conflicts of interest, in that a Hobart adviser may be inclined to utilize the AssetMark Platform in order to receive and maximize these benefits. However, Hobart recognizes the conflict of interest and manages that conflict by periodically evaluating and assessing whether maintaining assets on the AssetMark Platform is in the clients' best interest, taking into consideration the quality of the services provided by AssetMark for the clients' benefit, or available to Hobart via the Platform in connection with services Hobart provides to its clients, cost to the client and other factors.

Code of Ethics:

Hobart, its management, and persons associated with the Firm subscribe to a strict Code of Ethics. Our Code of Ethics is designed to comply with the investment advisory laws and regulations that require firms to act as fiduciaries in transactions with their clients. Our fiduciary duty requires that we act solely in our clients' best interest and adhere to standards of utmost integrity in our communications and transactions. These standards ensure that your interests are given priority.

The Firm's Code of Ethics contains extensive policies, guidelines, and procedures that promote ethical practices and conduct by all of the Firm's personnel. We adopted our Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or perceived or potential conflicts of interest), as well as to establish reporting requirements and enforcement procedures relating to personal transactions by our personnel. Our Code of Ethics, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes our ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions:

Hobart does not recommend that its clients buy or sell securities in which a related person may have a material financial interest.

Proprietary Trading:

Hobart and its associated persons are permitted to buy or sell securities that the Firm also recommends to clients consistent with the Firm's policies and procedures. This creates a conflict of interest in that representatives have an incentive to place their own interests ahead of clients' interests. We will always document any transactions that could be construed as a conflict of interest. To mitigate or remedy any actual or potential conflicts of interest, we will monitor trading reports for adherence to our Code of Ethics.

Simultaneous Trading:

From time to time, the Firm and its associated persons may buy or sell securities for their own accounts at or around the same time as clients do. This policy presents a conflict of interest in that such parties have an incentive to prioritize their own trading over their clients. To mitigate this conflict, in any instance where such securities are purchased or sold we will uphold our fiduciary duty by always ensuring that transactions are beneficial to the interest of our clients and that neither the sequence nor timing of execution or any other factor results in a benefit to Hobart or our associated persons.

Review of Accounts:

Our management personnel or financial advisors review accounts on at least a quarterly basis for our Asset Management clients. The nature of these reviews is to learn whether client accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable.

Our Firm may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

Financial Planning clients will not receive reviews of their written plans unless they take action to schedule a financial consultation with us. Our Firm does not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Financial Planning clients do not receive written or verbal updated reports regarding their financial plans unless they separately engage our Firm for a post-financial plan meeting or update to their initial written financial plan.

Client Reports:

Asset management clients will receive written transaction confirmations from the account custodian shortly after executing purchases or sales. Additionally, the account custodian will send at least quarterly written statements for each quarter in which the client has an account under management by our Firm. These statements will provide details regarding account activity, holdings, and performance. Please note that while brokerage assets may be reflected on account statements, these assets are not included in calculation of your management fee, nor are these assets managed by HPC. From time to time, clients may receive reports from Hobart regarding holdings, portfolio performance and other matters. Clients are encouraged to compare such reports to their actual account statements received from the custodian.

Client Referrals & Other Compensation:

We do not directly or indirectly compensate any person for client referrals.

We may from time to time receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are typically a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are typically the result of informal expense sharing arrangements in which product sponsors may underwrite costs incurred for marketing such as client appreciation events, advertising, publishing, and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific quotas, the product sponsor reimbursements are typically made by those sponsors for which policies have been issued

or for which it is anticipated policy placements will be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of our clients. We attempt to control for this conflict by always basing investment decisions on the individual needs of our clients.

Financial Information

Our Firm is not required to provide financial information in this Wrap Brochure because:

- Our Firm does not require or solicit the prepayment of more than \$1,200 in fees per client six or more months in advance of services rendered.
- Our Firm does not have any financial condition or commitment that impairs or is reasonably likely to impair our ability to meet contractual and fiduciary obligations to clients.
- Our Firm has never been the subject of a bankruptcy proceeding.