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**May 5, 2020**

This Brochure provides information about the qualifications and business practices of Mission Hill Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at (512) 982-9933 or via email at [hal@missionhilladvisors.com](mailto:hal@missionhilladvisors.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Mission Hill Advisors, LLC ("MHA") is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Additional information about MHA is also available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a CRD number. The CRD number for MHA is 171866. The SEC's web site also provides information about any persons affiliated with MHA who are registered, or are required to be registered, as Investment Adviser Representatives of MHA.

## Item 2 – Material Changes

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Since its last annual updating amendment filed on April 1, 2020, Mission Hill Advisors has applied for registration with the State of Texas. In the future, this section of the Brochure will discuss only the specific material changes that were made to the Brochure and will provide you with a summary of all material changes that have occurred since the last filing of this Brochure. This section will also identify the date of our last annual Brochure update.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year end which is December 31st. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, our Brochure may be requested at any time, without charge, by contacting Hal Peterson at (512) 829-0622.

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## Item 4 – Advisory Business Introduction

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Mission Hill Advisors, LLC (“MHA”) is a Registered Investment Adviser (“Adviser”) with the State of Texas. MHA offers investment advice, consulting, asset management, and other financial services to family offices, high-net worth individuals, endowments, and foundations.

We provide investment advice through Investment Adviser Representatives (“Advisor”) associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf. In addition, all advisors are required to have a college degree, professional designation(s), and professional experience.

MHA was founded in 2014 by Hal Peterson who serves as Chief Investment Officer, Chief Compliance Officer, and Managing Principal.

As an independent RIA, the firm is a fiduciary and thus has the responsibility to provide prudent objective advice, free of conflicts, which is in the best interest of its clients. With no economic relationships other than with its clients, Mission Hill acts as an advocate, and is strictly focused on finding the appropriate solutions to its client’s investment needs. We help our clients gain a valuable understanding of the performance of their investments, the factors that contribute to uncertainty, and the expected behavior of their portfolios.

We are committed to the precept that by placing the client’s interests first, we will add value to the asset management process and earn the client’s trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

### Services

We provide various asset management and investment consulting services.

We manage client accounts on a discretionary basis or nondiscretionary basis, which means the client decides whether to give us the authority to determine the following with/without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account
- Broker-dealer to be used for a purchase or sale of securities for your account
- Commission rates to be paid to a broker or dealer for your securities transaction.

Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professionals to assist you with tax planning. We will be

happy to meet with you at your convenience to review your investment portfolio and to address any and all questions that you might have.

## **Investment Consulting**

We provide fee-based investment consulting services. Services provided include an in-depth and rigorous analysis of existing investment portfolios, including risk factor and performance attribution analysis of portfolios. The objective is to help clients understand the behavior of their investment portfolios by quantifying risk and identifying the factors that contribute to uncertainty. In part, this work helps fiduciaries understand the degree to which equity markets influence the behavior of their portfolios. These engagements focus largely on assisting fiduciaries (trustees, investment committees, etc.) in fulfilling their duty to their constituents. Experience suggests that the influence of equity markets is often higher than would be expected in an otherwise diversified portfolio.

Other services include, but are not limited to: formulation of requests for proposal for investment consulting/advisory services, investment manager due-diligence, review and monitoring, investment committee structuring, custody services review and evaluation, performance reporting, benchmark selection, professional advisor recommendation and review (service providers including: investment advisers, tax, estate planning, asset protection, insurance, aircraft, real estate, etc.).

Mission Hill Advisors, LLC has special expertise in the design, implementation, and administration of Restricted Stock Trading Plans under SEC Rule 10b5-1. These plans enable corporate executives and others deemed to potentially have material inside information about a company's financial condition, strategy, products, etc. to state in advance of having that information that they will be sellers of their company's shares at pre-determined prices in the future.

Mission Hill Advisors, LLC has expertise in the hedging and diversification of concentrated positions of single securities. Corporate executives may have a concentrated position in their company's stock and therefore need or desire strategies that can minimize downside risk associated with that position. Many special circumstances apply in these cases including restrictions on the sale of securities by executives, so all aspects must be considered carefully when designing these strategies. Mission Hill provides advice and consulting on strategy as well as counter-party selection and monitoring.

In addition to the analysis of investment portfolios, MHA will review and draft Investment Policy Statements, Spending Policies, draft and execute Requests for Proposals, screen and interview Institutional Investment Consultants, Registered Investment Advisors, custodians, and money managers on behalf of its clients. The firm provides in-depth research on each investment manager or strategy selected for its clients. This includes not only rigorous initial screening including both quantitative and qualitative analysis, but also ongoing reviews of the manager, and quarterly reporting.

In performing investment consulting services, we typically examine and analyze your overall financial situation, which may include issues such as taxes, insurance needs, overall debt, credit, business consulting, retirement savings and reviewing your current investment program. Our services may focus on all or only one of these areas depending upon the scope of our engagement with you.

It is essential that you provide the information and documentation we request regarding your income, investments, taxes, insurance, estate plan, etc. We will discuss your investment objectives, needs and goals, but you are obligated to inform us of any changes. We do not verify any information obtained from you, your attorney, accountant or other professionals.

If you engage us to perform these services, you will receive a written agreement detailing the services, fees, terms and conditions of the relationship. You will also receive this Brochure. You are under no obligation to implement recommendations through us. You may implement your financial strategy through any financial organization of your choice.

We obtain information from a wide variety of publicly available sources. We do not have any inside private information about any investments that are recommended. All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations. Choosing which advice to follow is your decision.

## **Asset Management**

Asset management is the professional management of securities (stocks, bonds and other securities) and assets (e.g., real estate) in order to meet your specified investment goals. With an Asset Management Account, you engage us to assist you in developing a custom-tailored portfolio designed to meet your unique investment objectives. The investments in the portfolio will typically include individual equities, publicly traded fixed income securities, institutional mutual funds (both active and passive), index funds, exchange traded funds (ETFs), stock options, private real estate offerings, publicly traded real estate investment trusts (REITs), separate accounts, single strategy hedge funds, funds of funds, private equity funds, private market investments, and structured investment solutions.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to complete the MHA Investment Preferences Questionnaire. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

We will develop an Investment Policy Statement (IPS) for each client or unique entity under management (individual, family partnership, children's trust, private foundation, etc.) and deliver it to you upon completion. The IPS defines the asset allocation, the types of investments to be included, and the rebalancing methodology for the portfolio. The IPS will reflect the client's goals, objectives, and tolerance for risk. The IPS will serve as a roadmap for making prudent investment decisions going forward and will help reduce the emotion associated with making financial market decisions. Your IPS will incorporate many different aspects of your financial status into an overall financial strategy designed to meet your goals and objectives. Typically, MHA will implement each clients' investment policy using a broad range of investments, investment vehicles, and strategies.

Based on the information you share with us, we will analyze your situation and recommend an appropriate asset allocation or investment strategy. You will be provided with a targeted strategic allocation of assets by asset class. Our recommendations and ongoing management are based upon your investment goals and objectives, risk tolerance, and the investment portfolio you have selected. We will proactively

monitor your portfolio, trade as necessary, and communicate regularly with you. Your unique circumstances shall be reviewed and discussed in our periodic meetings with you. These reviews will be conducted in person, by telephone conference, and/or via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. You will also receive our Advisory Agreement which describes the services we will provide you and the fees associated with those services.

We will:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, periodic rate of return reports, asset allocation statement, rebalanced statements as needed
- Advise on asset selection
- Determine asset class exposure through asset allocation models
- Provide research and information on performance and fund management changes
- Build a risk management profile for you
- Assist you in setting and monitoring goals and objectives
- Provide personal consultations as necessary upon your request or as needed.

You are obligated to notify us as promptly possible whenever your financial situation, goals, objectives, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account. We may recommend that you sell any security if we believe that it is not suitable for you or your current investment strategy. You are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not indicative of future results.

If you decide to implement our recommendations, we will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. We recommend using Schwab Institutional; however, you may use any custodian you wish. The identity of your custodian will be communicated to you before the account is opened.

You will enter into a separate custodial agreement with the custodian. The custodian will effect transactions, deliver securities, make payments, etc. You are notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These statements list the total value at the start of the timeframe, itemize all transaction activity during the timeframe, and list the types,



amounts, and total value of securities held as of the end of the timeframe. Your statement may be in either printed or electronic form based upon your preferences. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting, and receiving transaction confirmations.

## **ERISA Fiduciary**

MHA understands and attests that the firm is an ERISA fiduciary as defined in the Fiduciary Rule under the Employee Retirement Income Security Act of 1974 and the Internal Revenue Code of 1986 as it relates to Individual Retirement Accounts (IRAs). We adhere to the Impartial Conduct Standards (including the “best interest” standard, reasonable compensation, and no misrepresented information.

We do not act as a discretionary investment manager of any Plan as defined in Section 3(38) of the Employee Retirement Income Security Act of 1974. We do not act as a non-discretionary investment manager of any Plan as defined in Section 3(21) of the Employee Retirement Income Security Act of 1974.

## **Wrap Fee**

MHA does not sponsor or participate in any third-party wrap fee programs.

## **Assets Under Management**

As of December 31, 2019, our registration with the SEC had just recently been approved and we had no assets under management.

# **Item 5 – Fees and Compensation**

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We provide asset management and investment consulting services for a fee.

## **Investment Consulting Fees**

Mission Hill Advisors, LLC provides consulting services to individuals, endowments, foundations, and family offices. We can provide analysis and recommendations for retirement needs, estate consulting needs, income tax consulting, life and disability insurance needs, investment needs, and college education consulting. We provide these services on an hourly basis at \$500 per hour with a minimum of 20 hours. All fees are negotiable depending upon the nature and complexity of your circumstances. An estimate for total hours will be determined at the start of the consulting relationship.

The Investment Consulting Agreement will show the fee you will pay. In the event that you cancel the Investment Consulting Agreement, you will be responsible for the actual hours spent preparing the financial analysis and consulting and rendering of consulting services, up to the cancellation date, at the agreed upon hourly rate. A deposit of 50% of the fee is due at the time the agreement is signed. The remainder of the fee is due upon the rendering of consulting services. We do not accept prepayment of more than \$500 in fees per client and six months or more in advance. The investment consulting agreement will terminate once the final consulting services are rendered.

MHA may also provide investment consulting services on a retainer basis. Fees range from \$10,000 to \$20,000 monthly in advance. All fees are negotiable depending upon the complexity and nature of your circumstances. The retainer and hourly fees will be paid by check. The Client's preference is indicated in Appendix A of the Agreement.

Either party may terminate the relationship with a written notice. Upon termination of any account, any prepaid fees that are in excess of the consulting services performed are prorated from the date of termination will be promptly refunded to you via check.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

### **Asset Management Fee Schedule**

Our minimum account opening balance is \$10,000,000 and a minimum fee of \$20,000 which may be negotiable based upon certain circumstances. Fees are calculated on the aggregate investment amount and are debited quarterly in advance, based on the Account value at the end of each quarter. Multiple accounts of family members and related entities may be consolidated for billing purposes. Asset Management fees are calculated as follows:

Percentage Tier	Portion of Portfolio (AUM) to which each Percentage Tier is Applicable
0.65%	\$10,000,000
0.45%	\$10,000,001 to \$25,000,000
0.35%	\$25,000,001- \$50,000,000
0.25%	\$50,000,001+

The fees shown above are annual fees and may be negotiable based upon certain circumstances.

No increase in the annual fee shall be effective without prior written notification to you. We believe our advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

Your account at the custodian may also be charged for certain additional assets managed for you by us but not held by the custodian (i.e. hedge funds, mutual funds).

The fees we charge can be deducted directly from your account at the custodian. We will instruct the custodian to deduct the fees from your account at the end of the quarter. This fee will show up as a deduction on your account statement from the custodian.

Either party may terminate the relationship with a thirty (30) day written notice. Upon termination of any account, any prepaid fees that are in excess of the management services performed will be promptly refunded to you on a pro rata basis.

## **Third Party Fees**

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians, third party investment companies and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Certain strategies offered by us may involve investment in mutual funds and/or ETFs. Load and no load mutual funds may pay annual distribution charges, sometimes referred to as "12(b)(1) fees". These 12(b)(1) fees come from fund assets, and thus indirectly from clients' assets. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge. Our brokerage practices are discussed in more detail under Item 12 – Brokerage Practices.

## **Item 6 – Performance Based Fee and Side by Side Management**

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We do not charge any performance-based fees. These are fees based on a share of capital gains or capital appreciation of the assets of a client.

## **Item 7 – Types of Client(s)**

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We provide portfolio management services to a small number of affluent families and their family offices, high-net worth individuals, endowments, and foundations.

Our minimum account opening balance is \$10,000,000 and a minimum fee of \$20,000 which may be negotiable based upon certain circumstances.

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

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We use fundamental analysis based upon Modern Portfolio Theory as part of our overall investment management discipline. The application of this type of analytical framework is part of our investment advisory services and may include all or some combination of the following types of analysis.

## Methods of Analysis

### Fundamental Analysis

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The objective of performing fundamental analysis is to arrive at a value that can be compared to the security's current market price, with the aim of determining a position to take with that security (underpriced = buy, overpriced = sell or sell short).

In order to perform this fundamental analysis, we use many resources, such as:

- Bloomberg
- Thomson Reuters (Refinitiv)
- Financial Media (Wall Street Journal, Barron's, etc.)
- Annual reports, prospectuses, company filings
- Company press releases, earnings communications, and website postings

### Modern Portfolio Theory (MPT)

We use Modern Portfolio Theory to help select the funds we use in your account.

Modern portfolio theory attempts to understand the market as a whole, rather than looking for what makes each investment opportunity unique. Investments are described statistically, in terms of their expected long-term rate of return and their expected volatility. Volatility is equated with risk, measuring how much worse than average an investment's bad years are likely to be. The end goal is to identify your acceptable level of risk tolerance, and then to construct a portfolio with the maximum expected return for that given level of risk.

### Investment Strategies

The investment strategies we use to implement any investment advice given to you may include, but are not limited to:

- Active Investment Strategies
- Passive Investment Strategies including Factor-Weighted (Smart Beta) Strategies
- Long-Short Strategies
- Hedged Investment Strategies
- Opportunistic or Event-Driven Strategies
- Inflation-Linked Strategies
- Long-term Investment Strategies with limited liquidity

## Risks

We cannot guarantee our analysis methods will yield a positive return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss. Investors must understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of some of the risks associated with the strategies we utilize for our clients include the following:

### 1. Alternative Investment Risk

Investing in alternative investments may be considered speculative, and may not be suitable for all clients. Generally alternative investments are intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include:

- Loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices.
- Lack of liquidity in that there may be no secondary market for the fund.
- Volatility of returns.
- Absence of information regarding valuations and pricing.
- Delays in tax reporting.
- Less regulation and higher fees than traditional investments.

### 2. Bond Fund Risk

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies designed to generate higher returns. The risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

### 3. Fundamental Analysis Risk

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- The data used may be out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.

### 4. Modern Portfolio Theory (MPT) Risk

Modern Portfolio Theory tries to understand the market as a whole and to quantify market volatility in an attempt to reduce the inherent risks of investing in the market. However, with every financial investment strategy there is a risk of a loss of principal. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

### 5. Mutual Funds Risk

The following is a list of some general risks associated with investing in mutual funds.

- Country Risk - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- Currency Risk -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- Income Risk - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- Industry Risk - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- Inflation Risk - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- Manager Risk -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- Market Risk -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- Principal Risk -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

## 6. Stock Fund Risk

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

## 7. Overall Risks

- Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.
- Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.
- While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

## Item 9 – Disciplinary Information

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Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose concerning MHA or any of our investment advisors. We adhere to high ethical standards for all advisors and associates. We strive to do what is in your best interests.

## Item 10 – Other Financial Industry Activities and Affiliations

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### Other Affiliations – Hal Peterson

Mr. Peterson currently serves on the Board of Trustees of Huston-Tillotson University and is Chairman of the school's Investment Committee. He serves as Chair of the Endowment Committee and as a member of the Administrative Board and Investment Committee of Tarrytown United Methodist Church. He is a member of the President's Advisory Council of the Texas Methodist Foundation (TMF). Mr. Peterson previously served on the Advisory Council of the McCombs School of Business Master of Science in Finance program; at the University of Texas at Austin. He was previously a member of the Board of Trustees, Executive Committee, and Chair of the Investment Committee for the Seton Fund. Mr. Peterson also served as Chairman of the Board of Governors of the Austin Community Foundation and as Chairman of the Investment Committee, and Member of the Governance Committee. Mr. Peterson was previously

Chair of the Investment Committee of the St. Andrew's Episcopal School Endowment. Mr. Peterson spends approximately 10% of his time in these capacities.

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

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### **Code of Ethics**

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

### **Participation or Interest in Client Accounts**

Our Compliance policies and procedures prohibit anyone associated with MHA from having an interest in a client account or participating in the profits of a client's account without the approval of the Chief Compliance Officer (CCO).

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud.
- Making any untrue statement of a material fact.
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading.
- Engaging in any fraudulent or deceitful act, practice or course of business.
- Engaging in any manipulative practices.

You may request a copy of the firm's Code of Ethics by contacting Hal Peterson.

### **Personal Trading**

We may trade securities in our own accounts that we have recommended to you. However, we can only do so if we execute your trades before any personal trades are executed. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of our advisory clients.

We have established the following restrictions in order to ensure our fiduciary responsibilities to you are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of Investment Advisory Representative(s) of MHA, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.



However, some securities trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with our records as required.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

## **Privacy Statement**

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

## **Conflicts of Interest**

MHA's advisors may employ the same strategy for their personal investment accounts as it does for its clients. However, advisors may not place their orders in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

We adhere to the Impartial Conduct Standards which includes the "best interest" standard, reasonable compensation and no misrepresentation of information. We have policies and procedures in place to monitor our adherence to our fiduciary obligation.

## **Item 12 – Brokerage Practices**

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### **Soft Dollars**

MHA does not participate in any Soft-Dollar programs with any provider of services to the firm.

### **Best Execution**

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of

research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

## **Economic Benefits**

MHA may recommend/require that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. The final decision to custody assets with Schwab is at the discretion of the Advisor's clients, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder. MHA is independently owned and operated and not affiliated with Schwab. Schwab provides MHA with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For MHA client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to MHA other products and services that benefit MHA but may not benefit its clients' accounts. These benefits may include national, regional or MHA specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of MHA by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist MHA in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of MHA's fees from its clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of MHA's accounts, including accounts not maintained at Schwab Advisor Services. Schwab Advisor Services also makes available to MHA other services intended to help MHA manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to MHA by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party

providing these services to MHA. While, as a fiduciary, MHA endeavors to act in its clients' best interests, MHA's recommendation/requirement that clients maintain their assets in accounts at Schwab may be based in part on the benefit to MHA of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

## **Brokerage for Client Referrals**

We do not receive any compensation or incentive for referring you to broker-dealers for brokerage trades.

## **Directed Brokerage**

Not all advisory firms require you to direct brokerage to a specific broker-dealer or custodian. By directing brokerage to Schwab Institutional, you may pay higher fees or transaction costs than those obtainable by other broker-dealers or custodians. In most cases, we believe you are paying a discounted and reasonable rate.

If you elect to select your own broker-dealer or custodian and direct us to use them, you may pay higher or lower fees than what is available through our relationships. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer or custodian for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction.

## **Trading**

Transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

## **Item 13 – Review of Accounts**

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### **Reviews**

Formal reviews are conducted with clients as often as they desire or at least annually. Some clients prefer a semi-annual or quarterly review. Reviews will be conducted by our Chief Investment Officer, Chief Compliance Officer, and Managing Partner Hal Peterson. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a fund or strategy in which client assets are invested, and recommended meetings with clients accordingly.

### **Reports**

The firm also provides a quarterly report to clients that include valuation of the portfolio, asset allocation, investment performance, and a transaction summary, along with an invoice copy.

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

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We do not receive any compensation for referring clients to another advisor nor do we pay any compensation to other investment advisors, tax advisors, or legal counsel, if they refer clients to us.

## **Item 15 – Custody**

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We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your account(s) if we have the ability to deduct your quarterly fees from the custodian. We use Schwab Institutional as the custodian and/or broker-dealer for all your accounts. You should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains your investment assets. We urge you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact MHA.

We do not debit the client fees directly from your advisory account. We send information to your custodian to debit your fees and to pay us. Clients authorize their custodian to pay us directly at the time the advisory relationship is established.

## **Item 16 – Investment Discretion**

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We customarily receive discretionary authority from you at the beginning of an advisory relationship to select investments and determine the amount of securities to be bought or sold. This information is described in the Advisory Agreement you sign with us. In all cases, however, this discretion is exercised in a manner consistent with your stated investment objectives for your account.

When selecting securities and determining investment allocations, we observe the investment policies, limitations and restrictions you have established for us. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

We require that any investment guidelines and/or restrictions be provided to us in writing.

## **Item 17 – Voting Client Securities**

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As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. We are

authorized to instruct the custodian to forward you copies of all proxies and shareholder communications relating to your account assets.

## **Item 18 – Financial Information**

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We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

## **Item 19 – Requirements for State-Registered Advisers**

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### **EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE OF PRINCIPAL OFFICERS**

Hal Peterson is the sole owner and principal for MHA. For information regarding Hal Peterson's educational background and business experience, please see the brochure supplement supplied as Part 2B.

### **OTHER BUSINESS ACTIVITIES OF PRINCIPAL OFFICER**

Please see the brochure supplement supplied as Part 2B.

### **PERFORMANCE-BASED FEES**

MHA's IARs do not currently charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the assets of a client).

### **DISCIPLINARY INFORMATION**

MHA's IARs are not subject to any arbitration claim or found liable in a civil, self-regulatory, or administrative proceeding.

### **MATERIAL RELATIONSHIPS WITH ISSUERS OF SECURITIES**

Neither MHA nor its IARs has any relationship or arrangement with issuers of securities.

## **ADV Part 2B Brochure Supplement – Hal Peterson**

### **Item 1 – Cover Page**

**Hal Peterson**

**CRD # 1605103**

**Mission Hill Advisors, LLC  
1303 San Antonio, Suite 840  
Austin, Texas 78701  
www.missionhilladvisors.com  
(512) 829-0622**

This Brochure supplement provides information about Hal Peterson and supplements the Mission Hill Advisors, LLC (“MHA”) Brochure. You should have received a copy of that Brochure. Please contact Hal Peterson if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Additional information about MHA and Hal Peterson CRD# 1605103 is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Legal Name: Harold Everett Peterson Jr

Year of Birth: 1962

### Education

Bachelor of Science in Economics 1985  
Colorado State University, Fort Collins, Colorado

### Designations

Certified Investment Management Analyst (CIMA), 2006

Investment Management Consultants Association; Completed through the University of Pennsylvania – The Wharton School

### Minimum Designation Requirements

#### Certified Investment Management Analyst (CIMA)

**Issuing Organization:** Investments and Wealth Institute (formerly IMCA, Investment Management Consultants Association)

**Prerequisites/Experience Required:** Three years of financial services experience; and a satisfactory record of ethical conduct, as determined by IMCA's Admissions Committee.

**Educational Requirements:** Completion of classroom program provided by an IMCA registered education provider.

**Examination Type:** Qualification Examination and Certification Examination (online, proctored)

**Continuing Education/Experience Requirements:** 40 hours every two years

### Business History

November 2019 – present	Managing Principal, CIO, CCO at Mission Hill Advisors, LLC
December 2018 – November 2019	Managing Principal, Columbia Pacific Wealth Management, LLC
July 2014 – December 2018	Managing Principal, CIO, CCO at Mission Hill Advisors, LLC
August 2000 – May 2014	Chief Investment Officer and Managing Partner at Durbin Bennett Peterson Private Wealth Management, LLC
January 1994 – August 2000	Senior Vice President and Senior Portfolio Manager at Bank of America Private Bank
March 1989 – January 1994	Senior Vice President at Frost Bank/First City Texas
May 1985 – March 1989	Vice President at Kidder Peabody & Company

## Item 3 – Disciplinary History

Neither MHA nor Hal Peterson has any disciplinary history to disclose.

## Item 4 – Other Business Activities

As noted in item 10 “Other Financial Industry Activities and Affiliations” above, Hal Peterson has the following outside business activities and/or affiliations to disclose.

Mr. Peterson serves on the Advisory Council of the McCombs School of Business Master of Science in Finance program; a business school at The University of Texas at Austin. For the Seton Fund, Mr. Peterson is a Member of the Investment Committee, Board of Trustees, and Executive Committee. Mr. Peterson also serves on the Austin Community Foundation as Chairman of the Board of Governors, Member and past Chairman of the Investment Committee, and Member of the Governance Committee. For the Tarrytown United Methodist Church, Mr. Person serves as the Chair, Endowment Committee Member, and Finance Committee Member. Mr. Peterson spends a total of approximately 10% of his time in these capacities.

### **Item 5 – Additional Compensation**

Hal Peterson does not receive any other compensation.

### **Item 6 – Supervision**

Hal Peterson is the Chief Compliance Officer and performs all supervisory duties for his firm.

### **Item 7 – Requirements for State-Registered Advisers**

Hal Peterson has no reportable events to disclose here.

### **Other Relationships**

Neither the firm nor Hal Peterson have any relationship with any issuer of securities.