Hudock Capital Group ("we", "us" or "our") is registered with the U.S. Securities and Exchange Commission ("SEC") as an investment adviser. Investment advisory services and compensation structures differ from that of a registered broker-dealer, and it is important that you understand the differences.

Free and simple tools are available to research firms and financial professionals at www.Investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing.

What investment services and advice can you provide me?

We provide discretionary and non-discretionary investment management services on a wrap fee basis as well as financial planning services to individuals, trusts and estates (our "retail investors").

When a retail investor engages us to provide investment management services we shall monitor, on a continuous basis, the investments in the accounts over which we have authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade and allocate the investments within your account(s) consistent with your investment objectives. Our authority over your account(s) shall continue until our engagement is terminated.

Our standard wrap fee engagement includes investment management and financial planning services. We generally require a minimum asset level of $1,000,000 to open and maintain an advisory account.

You should be aware that participating in a wrap fee program may cost more or less than the cost of purchasing advisory, brokerage and custodial services separately or from other advisers. Furthermore, as we are responsible for transactions fees associated with trades made within your account, we have a disincentive to purchase or sell securities in your account which may result in transaction expenses and therefore creates a conflict of interest.

We also provide financial planning and consulting services on a separate stand-alone basis.

When we provide financial planning or consultation services, we rely upon the information provided by the client for our financial analysis and do not verify any such information while providing this service.

We do not limit the scope of our investment advisor services to proprietary products or a limited group or type of investment.

Additional Information: For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please See Items 4 and 7, respectively in our ADV Part 2A and Items 4 and 6 in our Wrap Brochure.

Conversation Starters:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What Fees will I pay?

We provide our investment advisory services on a fee basis. When engaged to provide investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our "AUM Fee"). Our annual AUM Fee is negotiable but does not exceed 2.00%.

We typically deduct our AUM Fee from one or more of your accounts, in advance, on a quarterly basis. Because our AUM Fee is calculated as a percentage of your assets under management, the more assets you have in your advisory account, the more you will pay us for our investment management services. Therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage.

We offer our Financial Planning services on either a fixed fee basis, generally between $1,000 and $5,000, or on an hourly rate basis, generally between $100 to $325 per hour. The fee for subsequent work shall be agreed to prior to commencing the engagement.

Other Fees and Costs: Your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions. To the extent you have engaged us on a wrap fee basis you will not incur these fees in addition to our AUM Fee. However, relative to all mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level

(e.g., management fees and other fund expenses).

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Additional Information: For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our ADV Part 2A and Item 4 of our Wrap Brochure.

Conversation Starter:

- *Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. A number of our financial professionals are also registered representatives of APW Capital, Inc. ("APW"), an SEC registered broker-dealer. Therefore, your financial professional may offer you brokerage services through APW or investment advisory services through us. Brokerage services and investment advisory services are different, and the fees we, and APW, charge for those services are different. It is important that you understand the differences. Your financial professional may earn transaction-based compensation and have additional conflicts of interest as a result of providing brokerage services through APW. You are encouraged to learn more about APW by reviewing www.aurorapw.com/distinctions.php and having a discussion with your financial professional.

Our financial professionals generally only recommend investment advisory services to our clients and generally use APW Capital, Inc. for, smaller accounts, in-kind transfers from new clients, and/or legacy business.

Conversation Starter:

- *How might your conflicts of interest affect me, and how will you address them?*

Additional Information: For more detailed information about our conflicts of interest, please review our ADV Part 2A.

How do your financial professionals make money?

Our financial professionals are compensated on a salary basis. However, certain of our financial professionals, based upon their individual professional ability, may receive a performance bonus at year-end. You should discuss your financial professional's compensation directly with your financial professional.

Do you or your financial professionals have legal or disciplinary history?

No.

We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals.

Furthermore, we encourage you to as your financial professional: *As a financial professional, do you have any disciplinary history? If so, for what type of conduct?*

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer at any time to request a current copy of your ADV Part 2A or our *relationship summary*. Our Chief Compliance Officer may be reached by phone: (570) 326-9500.

Conversation Starters:

- *Who is my primary contact person?*
- *Is he or she a representative of an investment adviser or broker-dealer?*
- *Who can I talk to if I have concerns about how this person is treating me?*