

HOLD BROTHERS CAPITAL, LLC

CLIENT RELATIONSHIP SUMMARY

INTRODUCTION

Hold Brothers Capital, LLC (“we”, “our” or “us”) is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a member of the Financial Industry Regulatory Authority, (<http://finra.org>), and the Securities Investor Protection Corporation (<https://www.sipc.org/>). Hold Brothers Capital, LLC is not an Investment Advisor. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences.

What is the difference between a Broker and an Advisor, and how do fees differ?

A broker generally executes specific transactions on your behalf and is paid per transaction. An Advisor usually chooses investments for you and charges you a fee based on your portfolio’s total value.

What are your qualifications, licenses, experience, and education?

You can find more information about our representatives at <https://brokercheck.finra.org/> or ask us.

Here are some other websites you may find helpful to better understand different types of investing and services: <https://www.investor.gov/CRS> <https://www.finra.org/investors#/>

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer brokerage services to Retail Self-Directed Day Trading traders and investors, including the buying and selling of Equities and Exchange Traded Funds (ETFs). Day trading is the practice of opening and closing an equity (i.e., buying and selling the same stock) on the same trading day. A same-day buy and sell, or a same-day sell short and buy to cover, is considered a day trade.

We also offer access to Graybox, our proprietary electronic trading platform that allows you to monitor your own custom trading and strategies and route orders to Designated Market Access participants, who facilitate the execution of the orders.

We do not have discretionary authority on your account. You will make all the decisions regarding the purchase or sale of securities in your account. We do not make recommendations regarding securities, investment strategies or account types. We do not provide investment monitoring services.

Accounts may be opened as an Individual or Joint or as an entity, Corporation or Limited Liability Corporation. We require a minimum initial funding level of \$30,000 to open an account.

Pursuant to FINRA Rule 4210, if you meet the definition of a pattern day trader, you will always be required to maintain \$25,000 equity in your brokerage account. If your account equity falls below \$25,000, a day trading [minimum equity call](#) will be issued on your account requiring you to deposit additional funds or securities.

WHAT FEES WILL I PAY?

We charge commissions per transaction, which are negotiable. These charges appear on your trade confirmations. Brokerage fees, appearing on your account statement, may be charged such as:

- | | | |
|---------------------------|-----------------------------|---|
| - Market Data Fees | - ECN/Exchange Fees | - Trading Software Platform Fees |
| - Margin Interest | - Wire Transfer Fees | - Inactivity Fees |

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.

ASK YOUR FINANCIAL PROFESSIONAL...

- *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?*
- *How will you choose investments to recommend to me?*
- *Given my financial situation, should I choose an investment advisory service? Why or why not?*

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN PROVIDING RECOMMENDATIONS? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO YOU HAVE?

We do not make recommendations regarding securities, investment strategies or account types. The way we make money may create a conflict with your interests. You should learn about and ask us about these conflicts, because they may affect the services we provide. Here are some potential conflicts to consider.

Trading Activity. We have an incentive to encourage you to trade more frequently and in greater amounts because we receive more revenue and other benefits when you do so.

Margin. The margin interest we charge you to facilitate trading is revenue for us. The more you trade using margin, the more money we earn.

Payment for Order Flow. We may receive remuneration for orders in equity securities routed to broker-dealers or market centers for execution. We transact business on various market venues, and with varying market participants, including, without limitation, exchanges, electronic communication networks or other broker-dealers during normal business hours and during extended trading sessions and as such is subject to the standard schedule of transaction fees found therein, which may include certain rebates and or other cost savings. While transacting business on behalf of its clients, though not responsible for routing its client's orders, we may be the recipient of certain rebates and or savings. As such, we may, in some cases, receive benefits that could be construed as falling within the above definition of "payment for order flow."

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

As your account is self-directed, no individual financial professional will make money on your account directly. Our financial professionals generally are paid a base salary with a performance bonus at year-end.

ASK YOUR FINANCIAL PROFESSIONAL...

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

DO YOU OR YOUR FINANCIAL PROFESSIONAL HAVE LEGAL OR DISCIPLINARY HISTORY?

Yes. You may visit: <https://www.investor.gov/CRS> or <https://brokercheck.finra.org/> for free and simple tools to research us and our registered representatives.

ASK YOUR FINANCIAL PROFESSIONAL...

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

ADDITIONAL INFORMATION

You can obtain additional information about us and request a copy of this relationship summary at <http://www.hold.com/customerdisclosures.html> or by calling the Retail Manager at 646-745-2176.

ASK YOUR FINANCIAL PROFESSIONAL...

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