

Hudock Moyer Wealth Resources, LLC

FORM ADV PART 2A

**400 Market Street, Suite 200
Williamsport, Pennsylvania 17701**

**Local Phone: 570-326-9500
Toll-Free Phone: 866-855-0569
Fax: 570-326-9577**

www.hudockmoyer.com

04/05/2012

This brochure provides information about the qualifications and business practices of Hudock Moyer Wealth Resources, LLC. If you have any questions about the contents of this brochure, please contact us at 570-326-9500. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Hudock Moyer Wealth Resources, LLC is available on the SEC's website at www.adviserinfo.sec.gov . The searchable IARD/CRD number for Hudock Moyer Wealth Resources, LLC is 149255.

Hudock Moyer Wealth Resources, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Generally, Hudock Moyer Wealth Resources, LLC will notify clients of material changes on an annual basis. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document.

Item 3 Table of Contents

Item 1 Cover Page	Page 1
Item 2 Material Changes	Page 2
Item 3 Table of Contents	Page 3
Item 4 Advisory Business	Page 4
Item 5 Fees and Compensation	Page 7
Item 6 Performance-Based Fees and Side-By-Side Management	Page 8
Item 7 Types of Clients	Page 8
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	Page 8
Item 9 Disciplinary Information	Page 9
Item 10 Other Financial Industry Activities and Affiliations	Page 10
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	Page 10
Item 12 Brokerage Practices	Page 10
Item 13 Review of Accounts	Page 12
Item 14 Client Referrals and Other Compensation	Page 12
Item 15 Custody	Page 13
Item 16 Investment Discretion	Page 13
Item 17 Voting Client Securities	Page 13
Item 18 Financial Information	Page 14
Item 19 Requirements for State-Registered Advisers	Page 14
Item 20 Additional Information	Page 14

Item 4 Advisory Business

Description of Services and Fees

We are a registered investment adviser that is registered with the U.S. Securities and Exchange Commission, based in Williamsport, Pennsylvania. We are organized as a limited liability company under the laws of the Commonwealth of Pennsylvania. We have been providing investment advisory services since 2009. Barbara B. Hudock and Michael J. Hudock are our firm's owners. Currently, we offer the following investment advisory services, which are personalized to each individual client:

- **Asset Management Services**
- **Financial Planning Services**
- **Wrap Fee Program**

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our" and "us" refer to Hudock Moyer Wealth Resources, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

This Form ADV Part 2 is offered to potential and existing clients to provide an understanding of the services we provide, our conflicts of interest, and the experience and education of our personnel. The Form ADV Part 2 and its related Schedules are known collectively as the Disclosure Brochure.

Asset Management Services

We offer discretionary and non-discretionary asset management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for asset management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information (the "suitability information") at the beginning of our advisory relationship. We will use the Client Profile and the suitability information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our asset management services, we may customize an investment portfolio for you in accordance with your risk tolerance and investing objectives. We may also invest your assets using a predefined strategy, or we may invest your assets according to one or more model portfolios developed by our firm. Once we construct an investment portfolio for you, or select a model portfolio, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary asset management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment management agreement you sign with our firm, a power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

Advised Accounts: In some cases, you may elect to have us advise you on certain accounts without delegating the decision-making to our firm. We will make recommendations with regard to these accounts; however, you are responsible for deciding whether or not to implement our recommendations and for effecting any and all transactions on these advised accounts.

As part of our asset management services, we may use one or more sub-advisers to manage a portion of your account on a discretionary basis. A sub-advisor is an independent money manager that is not affiliated with our firm. We will regularly monitor the performance of your accounts managed by sub-adviser(s), and may hire and fire any sub-adviser without your prior approval. Our ability to hire any firm sub-advisers on your behalf is based on you granting our firm discretionary authority, which is typically granted by the investment management agreement you sign with our firm, a power of attorney, or trading authority forms. We will pay a portion of our advisory fee to the sub-adviser(s) we use; however, you will not pay our firm a higher advisory fee as a result of any sub-advisory relationships.

Our fee for asset management services is based on a percentage of your assets we manage as shown in the following fee schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
\$99,999 or less	2.00%
\$100,000 to \$499,999	1.75%
\$500,000 - \$999,999	1.50%
\$1,000,000 - \$4,999,999	1.25%
\$5,000,000 +	Negotiable

Our annual asset management fee is billed and payable quarterly in advance based on the value of your account on the last day of the previous calendar quarter. If the investment management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Our advisory fee is negotiable, depending on individual client circumstances. Generally, our fee for "advised accounts" is lower than our average asset management services fee while still within the range of the same fee schedule shown above.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced asset management fee based on the available breakpoints in our fee schedule stated above.

We will send you an invoice for the payment of our advisory fee, or we will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

Either party may terminate the asset management agreement by providing written notice to the other party. You will incur a pro rata charge for services rendered prior to the termination of the investment management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Financial Planning Services

We offer broad-based, modular, and consultative financial planning services. Financial planning will typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. If you retain our firm for financial planning services, we will meet with you to gather information about your financial

circumstances and objectives. Once we review and analyze the information you provide to our firm, we will deliver a plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to our firm. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

We charge a fixed fee for financial planning services, which generally ranges between \$500 and \$3000. The fee is negotiable depending upon the complexity and scope of the plan, your financial situation, and your objectives.

If you only require advice on a single aspect of your finances, we offer modular financial planning/general consulting services on an hourly basis. Our rate for such services ranges between \$100 and \$300 per hour and is negotiable depending on the scope and complexity of the plan, your financial situation, and your objectives. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, we will notify you in advance and request that you approve the additional fee. Fees are due upon completion of services rendered.

We may waive the financial planning fee at our discretion if you choose to implement the financial planning recommendations through Associated Persons in their separate capacities as insurance agents or registered representatives. Please see the "Fees and Compensation" section below for more information on Associated Persons' affiliations.

You may terminate the financial planning agreement by providing written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement. No refunds are applicable since fees are paid at the completion of the financial planning process.

Wrap Fee Program

We are a sponsor of a wrap fee program, which is a type of investment program that provides clients with asset management services for a single fee that includes management fees and transaction costs. If you participate in our portfolio management services, you will pay our firm a single fee, which includes our asset management fees, certain transaction costs, and custodial and administrative costs.

The overall cost you will incur if you participate in our wrap fee program may be higher or lower than you might incur by paying transaction costs separately. To compare the cost of the wrap fee program with non-wrap fee portfolio management services, you should consider the frequency of trading activity associated with our investment strategies, the brokerage commissions charged other broker/dealers, and the advisory fees charged by investment advisers.

If you participate in our wrap fee program, we will provide you with a separate Wrap Fee Program brochure explaining the program and costs associated with the program.

Types of Investments

Clients may select from a variety of investment management services, including portfolio management, investment consulting, wealth management, asset allocation, and financial planning. We provide services to clients through individuals registered as investment advisor representatives, who are referred to internally as "Wealth Consultants". We primarily offer advice on investment

company securities (mutual funds) and exchange traded funds (ETFs). We may also offer advice on equity securities, corporate debt securities, certificates of deposit, municipal securities, investment company securities, U.S. Government securities, and options contracts on securities.

Assets Under Management

As January 1, 2012, we manage \$ 406,623,537 in client assets on a discretionary basis.

Item 5 Fees and Compensation

Please refer to the "Advisory Business" section in this Brochure for information on our advisory fees, fee deduction arrangements, and refund policy according to each service we offer.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for asset management services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities; however, if you participate in our portfolio management program, we will pay certain transaction and custodial costs on your behalf. These charges and fees are typically imposed by the broker/dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker/dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Brochure.

Compensation for the Sale of Securities or Other Investment Products

Persons providing investment advice on behalf of our firm are registered representatives with Comprehensive Asset Management and Servicing, Inc. ("Comprehensive"), a securities broker/dealer. In their capacity as registered representatives, these persons will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by these persons in their capacities as registered representatives is separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm.

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Any material conflicts of interest between you and our firm, or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, we will provide you with written notification of the material conflicts of interest or an updated Brochure.

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

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the Advisory Business section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, trusts, estates, not-for-profit organizations, corporations, and other business entities.

In general, we require a minimum of \$1,000,000 to open and maintain an advisory account. At our discretion, we may waive this minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

- Charting Analysis - involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends.
- Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.
- Technical Analysis - involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.
- Cyclical Analysis - a type of technical analysis that involves evaluating recurring price patterns and trends.
- Modern Portfolio Theory (MPT) - a theory of investing which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. MPT is a mathematical formulation of the concept of diversification in investing, with the aim of selecting a collection of investment assets that has collectively lower risk than any individual asset. The risk, return, and correlation measures used by MPT are mathematical statements about the future. In practice investors must substitute predictions based on historical measurements of asset return and volatility for these values in the equations. Very often such expected values fail to take account of new circumstances which did not exist when the historical data were generated.
- Long Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.
- Short Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short- term price fluctuations.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Client assets are advised primarily based on the Modern Portfolio Theory and through diversification, which is a way to reduce risk by investing in a variety of assets.

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

As disclosed under the "Advisory Business" section in this Brochure, we primarily recommend mutual funds and exchange traded funds. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Mutual funds and exchange traded funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day.

The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely which can dilute other investors' interests.

Item 9 Disciplinary Information

Hudock Moyer Wealth Resources, LLC has been registered and providing investment advisory services since 2009. Neither our firm nor any of our associated persons has, nor has ever had, any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

Persons providing investment advice on behalf of our firm are registered representatives with Comprehensive Asset Management and Servicing, Inc. ("Comprehensive"), a securities broker/dealer. Please see the *Fees and Compensation* section in this brochure for more information on the compensation received by registered representatives who are affiliated with our firm.

Persons providing investment advice on behalf of our firm are independent insurance agents. Please see the *Fees and Compensation* section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Our Code of Ethics also requires that certain persons associated with our firm submit reports of their personal account holdings and transactions to a qualified representative of our firm who will review these reports on a periodic basis. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Wayne L. Dieffenderfer, Chief Compliance Officer at 570 326-9500.

Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of asset management services as disclosed in this Brochure.

Personal Trading Practices

Our firm, or persons associated with our firm, may buy or sell for their personal accounts the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in some cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

Suggestion of Brokers

We generally recommend the brokerage and custodial services of National Financial Services, LLC, ("NFS"), Fidelity Brokerage Services, LLC (collectively, and together with all affiliates, "Fidelity"), Pershing Advisor Solutions ("PAS" or "Pershing"), and/or Comprehensive Asset Management and Servicing, Inc. ("Comprehensive").

We examined potential conflicts of interest when we chose to enter into a relationship with Pershing, Fidelity, and Comprehensive, and we determined that these relationships are in the best interests of our clients and that these custodians/broker/dealers satisfy our fiduciary obligations, including the duty to seek best execution. A client may pay a commission that is higher than what

another qualified custodian/broker/dealer might charge to effect the same transaction where we have determined in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian/broker/dealer's services, including the value of research provided, execution capability, commission rates and the benefit to all clients. Best execution may not necessarily be the lowest possible commission rate for specific client account transactions. We believe that the recommended broker/dealer/custodian provides quality execution services for you at competitive prices.

Research and Other Benefits

Our firm has an arrangement with both Pershing and Fidelity through which both Pershing and Fidelity provide our firm with their "platform" services. The platform services include, among others, brokerage, custodial, administrative support, recordkeeping, and related services that are intended to support intermediaries such as our firm in conducting business and serving the best interests of clients. These may also be a benefit to our firm which may otherwise have to pay for such items at its own expense.

Pershing charges fees for the platform services mentioned above. Fidelity charges brokerage commissions and transactions fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Pershing and Fidelity enable our firm to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Pershing's and Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Pershing and Fidelity may be higher or lower than those charged by other custodians and broker/dealers. As part of our arrangements, Pershing and Fidelity also make available to us, at no additional charge, certain research and brokerage services, including research services obtained by Pershing or Fidelity directly from independent research companies, as selected by our firm. Some research packages may be selected by us from the Pershing or Fidelity systems and do not incur an additional charge to our firm. For example, these research and brokerage services presently may include those provided by Reuters, Standard and Poor's, and Bloomberg, and may be used by our firm to manage accounts and provide advice to all clients regardless as to whether such clients use Pershing or Fidelity.

We may have an incentive to select or recommend a custodian/broker/dealer based on our interest in receiving the research or other products or services, rather than on our clients' interests

Our firm is independently operated and owned and is not affiliated with either Pershing or Fidelity or Comprehensive.

Brokerage for Client Referrals

We do not receive client referrals from broker/dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

Persons providing investment advice on behalf of our firm who are registered representatives of Comprehensive will recommend Comprehensive to you for brokerage services. These individuals are subject to applicable rules that restrict them from conducting securities transactions away from Comprehensive unless Comprehensive provides the representative with written authorization to do so. Therefore, these individuals are generally limited to conducting securities transactions through Comprehensive. It may be the case that Comprehensive charges higher transactions costs and/or custodial fees than another broker charges for the same types of services. If transactions are executed through Comprehensive, these individuals (in their separate capacities as registered representatives of Comprehensive) may earn commission-based compensation as result of placing the recommended securities transactions through

Comprehensive. This practice is considered to create a conflict of interest because these registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. You may utilize the broker/dealer of your choice and have no obligation to purchase or sell securities through such broker as, we recommend. However, if you do not use Comprehensive, we may not be able to accept your account. Please see the "Fees and Compensation" section in this Brochure for more information on the compensation received by registered representatives who are affiliated with our firm.

Block Trades

We combine multiple orders for shares of the same securities purchased for discretionary accounts; however, we do not combine orders for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

When we combine multiple orders for shares of the same securities purchased for discretionary accounts, we will distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13 Review of Accounts

The Associated Person assigned to your account will monitor your account on an ongoing basis and will conduct account reviews at least annually to ensure the asset management services provided to you are consistent with your stated investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

We may provide you with additional written reports in conjunction with account reviews, depending on your specific arrangements with our firm. You will receive trade confirmations, monthly or quarterly statements, and annual tax reports from your account custodian(s).

Financial planning clients may be offered an annual review of their plan for an additional, negotiable hourly fee. We may waive this fee at our discretion.

Item 14 Client Referrals and Other Compensation

We do not compensate any individual or firm for client referrals.

On occasion, our firm receives sponsorship funding for our educational client events from one or more mutual funds companies. This receipt of funding is a potential conflict of interest because it could influence our firm to continue utilizing those funds companies for client investments. However, our firm is committed to our fiduciary duty of putting our clients' interests first which

mitigates the risk of possible influence on our decision making in this regard. In addition, please refer to the Brokerage Practices section above for disclosures on research and other benefits we may receive resulting from our relationships with broker/dealers we recommend to our clients.

Item 15 Custody

Hudock Moyer is deemed to have custody of certain client funds and/or securities although all client funds and securities are held for safekeeping and recordkeeping at an unrelated bank, broker/dealer, or other independent, qualified custodian (i.e., Pershing and/or Fidelity). Under the current rules of the SEC, our custody arrangements must meet the following criteria: 1) All accounts are held at a qualified and unrelated custodian, 2) all clients are notified in writing, both at the inception of a custodial relationship and in the event of any changes in such relationship that the custodian is holding the funds or securities, the address of the custodian, and the manner in which the assets are held, and 3) clients receive statements directly from the custodian on at least a quarterly basis. We have taken steps to ensure that we are in compliance with these requirements.

The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact Wayne L. Dieffenderfer, Chief Compliance Officer at 570-326-9500.

Item 16 Investment Discretion

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) by signing our investment management agreement, a power of attorney, and/or trading authorization forms.

You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s).

If you elect to use our "advised account" program, you will be responsible for making the decisions on whether or not to implement our recommendations and for executing any transactions for your account.

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. In rare cases, and only at your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Item 18 Financial Information

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$1,200 in fees and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

Item 19 Requirements for State-Registered Advisers

This section does not apply since we are a federally registered advisory firm.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker/dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will never sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy notice to you on an annual basis. Please contact Wayne L. Dieffenderfer, Chief Compliance Officer at 570-326-9500, if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, the profit will be kept by the account custodian.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit, nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

Should we receive written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by you, we will forward all notices, proof of claim forms and other materials to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward the information electronically.