

Mollot & Hardy, Inc.

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www.mollot.com

Disclosure Brochure

March 1, 2018

This brochure provides information about the qualifications and business practices of Mollot & Hardy, Inc. If you have any questions about the contents of this brochure, please contact us at 716.691.7121. 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.

Mollot & Hardy, Inc., 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 about which you determine to hire or retain an adviser.

Additional information about Mollot & Hardy, Inc., also is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 Summary of Material Changes

A disclosure brochure is made available to you initially when you enter into an advisory relationship with us. Annually, as warranted, and no later than June 28, we will provide a summary of any material changes to our brochure, which includes the date of the last annual update and information on how you may obtain a complete updated brochure free of charge. We may also provide updated disclosure information about material changes on a more frequent basis.

There have been no material changes to our disclosure brochure since it was last updated on March 8, 2017.

Our current brochure may be requested by contacting Alan R. Mollot, President and Chief Compliance Officer at 716.691.7121 or at alan@mollot.com. We will provide you with a brochure at any time without charge.

Additional information about us and about persons affiliated with us who are registered as our investment adviser representatives (“your advisory representative”) is also available via the SEC’s website, at www.adviserinfo.sec.gov. Information regarding your advisory representative can also be found in the supplement to this brochure.

Mollot & Hardy, Inc.
CRD Number 128377

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Item 4 Advisory Business

A. Ownership/Advisor History

Mollot & Hardy is a corporation organized under the laws of the State of New York. Alan R. Mollot founded the Amherst, NY-based investment advisory firm in 1970 and is the principal owner. Mollot & Hardy is registered with the State of New York as an investment advisory firm.

Mollot & Hardy offers asset management and financial planning services. We offer our services on a fee-only basis.

B. Types of Advisory Services

Through personal discussions in which goals and objectives based on your particular circumstances are established, we develop a customized personal investment plan for you. These plans include either a comprehensive financial plan or limited plans focusing on:

- estate planning,
- personal investment planning,
- retirement planning,
- business planning or
- pension analysis.

We may create and manage a portfolio based on the plan in conjunction with the services offered through other independent investment advisers. Account supervision is guided by your stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income).

We may also offer the Wealth Management Program (“WMP”), which is sponsored by FSC Securities Corporation (“FSC”), an unaffiliated broker-dealer and SEC registered investment adviser. The WMP provides comprehensive investment management of your assets through the application of asset allocation planning software, as well as the provision of execution, clearing and custodial services.

You receive the benefits of:

- risk tolerance assessment,
- efficient frontier plotting,
- fund profiling and performance data, and
- portfolio optimization and re-balancing.

Utilizing these tools, we construct portfolios consisting of:

- mutual funds,
- equities,
- debt securities,
- variable life and/or
- variable annuity sub-accounts (certain restrictions may apply).

C. Client Tailored Services and Client Imposed Restrictions

Each portfolio is designed to meet your individual needs, stated goals and objectives. Additionally, you have the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

In managing your investment portfolio, we consider your:

- financial situation,
- risk tolerance,
- investment horizon,
- liquidity needs,
- tax considerations,
- investment objectives, and
- any other issues important to your state of affairs.

You should notify us promptly if there are any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon the management of your account.

D. Wrap Program

Molloy & Hardy does not participate in a wrap program.

E. Client Assets Managed

As of December 31, 2016 we managed approximately \$52 million in client assets on a discretionary basis. As financial planners, we also oversee approximately \$48 million in other client assets including client investments in mutual funds, variable annuities, fixed annuities, and other retirement assets.

Item 5 Fees and Compensation

A. Fee Schedule

Our fee is calculated based upon the market value of the assets in your account on the last day of the previous quarter.

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians (“custodian/ broker-dealer”). Your custodian/broker-dealer determines the values of the assets in your portfolio.

Fees charged are dependent upon the third party investment advisory services and the asset class selected. The fees generally range from 1% to 2.5% inclusive of both our and the third-party’s investment advisory fees.

Fees for discretionary management through the WMP are based upon the amount of assets under management subject to the fee schedule below

<u>Assets under Management</u>	<u>Advisory Fee¹</u>
\$50,000 to \$249,999	2.30%
\$250,000 to \$499,999	2.05%
\$500,000 to \$749,999	1.80%
\$750,000 to \$1,249,999	1.55%
\$1,250,000 to \$1,999,999	1.30%
\$2,000,000 to \$4,999,999	1.05%
\$5,000,000 to \$24,999,999	0.90%
Over \$25 million	0.80%

¹ All fees are negotiable at our sole discretion.

B. Payment of Fees

Fees for the initial quarter are based on the value of your cash and securities on the date the custodian/broker-dealer receives them and are prorated based upon the number of calendar days in the calendar quarter that our agreement is in effect.

You must authorize us to have the custodian/broker-dealer pay us directly by charging your account. This authorization must be provided in writing. One-fourth of the annual fee is charged each calendar quarter.

We send a statement that includes the value of your investments, our advisory fee, and how it is calculated. Your custodian/broker dealer also provides you with statements that show the amount paid directly to us. You should compare the statement we send to your custodian/broker-dealer’s statement and verify the calculation of our fees. Your custodian broker-dealer does not verify the accuracy of fee calculation.

C. Client Responsibility for Third-Party Fees

In addition to our fee, you may be required to pay other charges such as:

- custodial fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or exchange traded funds (“ETFs”),
- fees charged by third party managers,
- maintenance and termination fees for IRAs, certain retirement and qualified accounts, and
- other fees and taxes on brokerage accounts and securities transactions.

None of these fees are paid to or shared with us.

Mutual fund companies, ETFs, and variable annuity issuers charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees charged by us. Complete details of these internal fees and expenses are explained in the prospectuses for each investment. You are strongly encouraged to read these explanations before investing any money. You may ask us any questions you have about fees and expenses.

If you purchase mutual funds through the custodian/broker-dealer, you may pay a transaction fee that would not be charged if the transactions were made directly through the mutual fund company. Also, mutual funds held in accounts at brokerage firms may pay internal fees that are different from funds held at the mutual fund company.

While you may purchase shares of mutual funds directly from the mutual fund company without a transaction fee, those investments would not be part of our advisory relationship with you. This means that they would not be included in our investment strategies, investment performance monitoring, or portfolio reallocations.

Please be sure to read Item 12 entitled “Brokerage Practices,” which follows later in this brochure.

D. Prepayment of Fees

Mollot & Hardy collects our advisory fees in advance of receiving our services. All advisory services can be terminated within 5 days of engaging us without penalty (full refund or no fees due) when our Disclosure Brochure is not delivered at least 48 hours before the time of engagement. Otherwise, services can be terminated at any time with a written notice. You are only billed for time incurred by us until receipt of the notice

of termination. If a portion of the fees were prepaid, we will promptly refund any unearned fees due back to the client. Financial planning services terminate automatically upon the delivery of the agreed upon services.

Should either one of us terminate the advisory agreement we have entered into before the end of a billing period, any unearned fees that were deducted from your account will be returned to you by us. The amount refunded to you is calculated by dividing the most recent advisory fee you paid by the total number of days in the quarter. This daily fee is then multiplied by the number of calendar days in the quarter that our agreement was in effect. This amount, which equals the amount we earned for the partial quarter, is subtracted from the total fee you paid in advance to determine your refund.

E. Outside Compensation for the Sale of Securities to Clients

Our advisory representatives are also registered representatives of FSC, a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. If you choose to implement your financial plan through FSC, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our advisory representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

We may receive benefits such as assistance with conferences and educational meetings from product sponsors.

Our advisory representatives may also recommend various asset management firms through their affiliation with FSC. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Item 6 Performance-Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments. We do not charge performance-based fees on any of our client accounts.

Item 7 Types of Clients

We provide advisory services primarily to high net worth individuals, including their trusts, estates and retirement accounts. We also provide services to corporations or business entities including their pension and profit sharing plans. As a condition for starting and maintaining a WMP account, we generally require a minimum portfolio size of \$50,000. We, at our sole discretion, may accept clients with smaller portfolios based upon certain factors including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing client relationships. We may consider the portfolios of your family members to determine if your portfolio meets the minimum size requirement.

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

A. Methods of Analysis and Investment Strategies

We select specific investments for your portfolios through the use of fundamental analysis. Fundamental analysis is a method of evaluating a company that has issued a security by attempting to measure the value of its underlying assets. It entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to the current price of the issuing company's security to determine whether to purchase, sell or hold the security.

Our investment strategies may include long-term and short-term purchases and sales. You may place reasonable restrictions on the strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

B. Material Risks Involved

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

C. Risks of Specific Securities Utilized

We will generally use, but are not limited to, the following securities in a client's portfolio: mutual funds, equities, bonds and other corporate debt instruments, money market funds and cash. Although we manage your portfolio in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. All investments are subject to loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. You should ask questions about risks you do not understand. Recommended investment strategies seek to balance risks and rewards to achieve investment strategies. You should be prepared to bear the risk of loss.

Item 9 Disciplinary Information

We have not been the subject of any legal or disciplinary events that would be material to your evaluation of our business or the integrity of our management.

Item 10 Other Financial Industry Activities and Affiliations

We have no relationships or arrangements with other related financial entities that are material to our advisory business or to you as our client.

As explained under "Fees and Conditions" above, our advisory representatives are licensed as registered representatives with FSC. We are also a licensed insurance broker, and our advisory representatives are licensed insurance agents with various insurance companies. These arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation your advisory representative can receive rather than based upon your needs.

As previously noted, we will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. You have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Our advisory representatives may also recommend various asset management firms through their affiliation with FSC. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

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

A. Code of Ethics

We have adopted a *Code of Ethics* (“*Code*”) to address the securities-related conduct of our advisory representatives and employees. The *Code* includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of our advisory representatives and employees be conducted in a manner consistent with the *Code* and avoid any actual or potential conflict of interest, or any abuse of an advisory representative’s or employee’s position of trust and responsibility;
- that advisory representatives may not take inappropriate advantage of their positions;
- that information concerning the identity of your security holdings and financial circumstances are confidential; and
- that independence in the investment decision-making process is paramount.

We will provide a copy of the *Code* to you or any prospective client upon request.

B. Recommendations Involving Material Financial Interests

Mollot & Hardy, its owner and investment adviser representative do not have a material interest in any securities.

C. Investing in the Same Securities

We do not buy or sell securities for our firm that we also recommend to clients. Our advisory representatives and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account(s). The personal securities transactions by advisory representatives and employees may raise potential conflicts of interest when they trade in a security that is owned by you, or is being considered for purchase or sale for your account.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require our advisory representatives and employees to act in your best interest,
- prohibit favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in an advisory representative or employee receiving a better price than a client.

Advisory representatives and employees must follow our procedures when purchasing or selling the same securities purchased or sold for you.

D. Recommending the Same Securities

From time to time, representatives of Mollot & Hardy may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Mollot & Hardy to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however Mollot & Hardy will never engage in trading that operates to the client's disadvantage if representatives of Mollot & Hardy buy or sell securities at or around the same time as clients.

Item 12. Brokerage Practices

A. Recommendation Criteria

We may recommend that the broker-dealer/custodian for your account be FSC and Pershing, LLC, FSC's clearing firm (collectively, "FSC/Pershing"). FSC/Pershing will assist us in servicing your accounts. We are independently owned and operated and not affiliated with FSC/Pershing. Our use of FSC/Pershing is, however, a beneficial business arrangement for us and for FSC/Pershing. Information regarding the benefits of this relationship is described below.

Our recommendation of a specific custodian is based in part on our existing relationships; the custodian's financial strength; reputation; breadth of investment products; and, the cost and quality of custody and brokerage services provided to you and our other clients.

The determining factor in the selection of FSC/Pershing to execute transactions for your accounts is not the lowest possible transaction cost, but whether FSC/Pershing can provide what is in our view the best qualitative execution for your account.

1. Research and Other Soft Dollar Benefits

We receive economic benefits as a result of our relationships with our custodians because we do not have to produce or purchase the products and services above. These services are not contingent upon us committing any specific amount of business to the custodians in trading commissions. Mollot & Hardy does not enter into any "soft dollar" arrangements with custodians and broker/dealers through which we receive

research or other services based on commissions generated in your account or the number transactions effected in your account.

FSC/Pershing does not charge separately for holding our clients' accounts, but may be compensated by you through other transaction-related fees associated with the securities transactions it executes for your accounts.

FSC/Pershing also makes available to us other products and services that benefit us but may not benefit you directly. Some of these products and services assist us in managing and administering our client accounts, such as software and other technology.

FSC/Pershing may also make available or arrange for these types of services to be provided to us by independent third parties. FSC/Pershing may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or a part of the fees of a third party providing these services to us. Thus, we receive economic benefits as a result of our relationship with FSC/Pershing, because we do not have to produce or purchase the products and services listed above.

Because the amount of our compensation or the products or services we receive may vary depending on the custodian/broker-dealer we recommend to be used by our clients, we may have a conflict of interest in making that recommendation. Our recommendation of specific custodian/broker-dealers may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

Commissions and other fees for transactions executed through FSC/Pershing may be higher than commissions and other fees available if you use another custodian/broker-dealer firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by FSC/Pershing outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial number of our accounts, including accounts not maintained at through FSC/Pershing. We do not attempt to allocate these benefits to specific clients.

2. Brokerage for Client Referrals

Mollot & Hardy receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Directed Brokerage

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

B. Aggregating Trading for Multiple Client Accounts

Mollot & Hardy does not aggregate or “bunch” trading for multiple client accounts.

Item 13. Review of Accounts

A. Frequency and Nature of Periodic Reviews

We perform an initial review of your overall financial condition that includes retirement planning and an investment review. All client accounts are monitored on an ongoing basis with a formal review conducted at least annually or as agreed upon with individual clients. The reviews focus on the consistency of portfolio investments with each client’s stated objectives and risk tolerances. Reviews also consider investment restrictions requested by individual clients, investment time horizons, liquidity needs, tax considerations and other circumstances unique to each client. On a quarterly basis, the performance of each client account is reviewed to monitor consistency with market benchmarks that we deem applicable.

B. Factors that Will Trigger a Non-Periodic Review

Account reviews may also be triggered by other factors such as changes in general economic and market conditions, analyst reports, issuer news and interest rate movement. Your advisory representative is responsible for all reviews.

C. Reports

You will receive statements from the custodian/broker-dealer at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values. You will also receive performance analysis reports prepared by us which describe the returns realized on the investments in your account.

Item 14 Client Referrals and Other Compensation

A. Other Compensation

We receive certain economic benefits as a result of our participation in FSC/Pershing's institutional program. Those benefits are described in detail in the preceding section entitled "Brokerage Practices."

B. Client Referrals

We do not directly or indirectly compensate any person who is not one of our advisory representatives or employees for client referrals.

Item 15 Custody

You will receive statements from the custodian/broker-dealer that holds your investment account on at least a quarterly basis. We urge you to carefully review these statements and compare them to the account statements that we may provide you. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

Item 16 Investment Discretion

We offer our advisory services on a both a discretionary and a non-discretionary basis.

In general, we offer our advisory services on a on a non-discretionary basis unless you agree and authorize us to have discretion in your advisory agreement. Providing advisory services on a non-discretionary basis means that we need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts. Furthermore, we do not have the ability to choose the broker-dealer through which transactions will be executed. Additionally, we do not have the ability to withdraw funds from your account (other than to withdraw our advisory fees which, may only be done with your prior written authorization.)

When we offer our services on a discretionary basis, we do so through a limited trading authority so that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts. This discretion is used in a manner consistent with the stated investment objectives for your account, if you have given us written authorization to do so. We only exercise discretion in accounts where we have been authorized by you to do so. This authorization is typically included

in the advisory agreement you enter into with us. You have the opportunity to place reasonable restrictions on the type of securities to be included in your account.

Item 17 Voting Client Securities

We do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested. In addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. We will, however, forward to you any information received by us regarding proxies and class action legal matters involving any securities held in your accounts.

Item 18 Financial Information

A. Balance Sheet

Molloy & Hardy neither requires nor solicits prepayment of more than \$500 in fees per clients, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you.

C. Bankruptcy

We have not been the subject of a bankruptcy proceeding.

Alan R. Mollot

Mollot & Hardy, Inc.

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ADV Part 2B
Brochure Supplement

March 1, 2018

This brochure supplement provides information about Alan R. Mollot that supplements the Mollot & Hardy, Inc. brochure. You should have received a copy of that brochure. Please contact Alan R. Mollot, President and Chief Compliance Officer if you did not receive Mollot & Hardy, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Alan R. Mollot, CRD Number 816494, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Alan R. Mollot

Year of birth: 1943

Formal education:

- State University of New York at Buffalo – 1965; B.S., Business Administration
- American College – 1972; Chartered Life Underwriter
- American College - 1984; Chartered Financial Consultant
- American Life Underwriting Training Council – Life Underwriter Training Council Fellow
- Certified Financial Planner Board of Standards – 1997; Certified Financial Planner
- State University of New York at Buffalo School of Management – 1965; Center for Entrepreneurial Leadership

Business background:

- Mollot & Hardy, Inc. – President, Chief Compliance Officer, Advisory Representative; (1972 – Present)
- FSC Securities Corporation – Registered Representative; (02/09 – Present)
- Advantage Capital Corp. – Registered Representative; (1977 – 02/09)

Professional Designations

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than

62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CLU

The Chartered Life Underwriter® (CLU) designation is a professional credential offered to persons through the CLU program that provides insights into the life

insurance business, its importance to the economy, its operation and distribution systems, and its resurging importance for safe and secure investments.

Candidates must pass an examination for the following five required courses and three elective courses to earn the designation:

Required Courses

- Fundamentals of Insurance Planning
- Individual Life Insurance
- Life Insurance Law
- Fundamentals of Estate Planning
- Planning for Business Owners and Professionals

Elective Courses

- Financial Planning: Process and Environment
- Individual Health Insurance
- Income Taxation
- Group Benefits
- Planning for Retirement Needs
- Investments
- Estate Planning Applications

Candidates must pass a test that is a two-hour, 100 question, computer-administered exam. National exams are given throughout the year.

Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required; an undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.

Each designee who falls in one of the following categories must complete 30 hours of continuing education every two years. If you do not fall into one of these categories, you are exempt from CE requirements:

- Licensed insurance agent/broker/consultant
- Licensed security representative/registered investment advisor
- Financial consultant, attorney, accountant, employee benefits specialist, and any other individual who provides insurance, employee benefits, financial planning, or estate planning advice and counsel to the public

ChFC

The Chartered Financial Consultant® (ChFC) designation program focuses on the comprehensive financial planning process as an organized way to collect and analyze information on a client's total financial situation; to identify and establish specific financial goals; and to formulate, implement, and monitor a comprehensive plan to achieve those goals.

The ChFC program provides financial planners and others in the financial services industry with in-depth knowledge of the skills needed to perform comprehensive financial planning for their clients.

Candidates must pass an examination for the following six required courses and two elective courses to earn the ChFC designation:

Required Courses

- Financial Planning: Process and Environment
- Fundamentals of Insurance Planning
- Income Taxation
- Planning for Retirement Needs
- Investments
- Fundamentals of Estate Planning
- Financial Planning Applications

Elective Courses

- The Financial System in the Economy
- Estate Planning Applications
- Financial Decisions for Retirement

As a general rule, candidates should plan to spend 50-70 hours studying for each course. The program can be completed as quickly as a candidate desires, but most students complete their designation requirements within 15-24 months.

Each exam is a two-hour, 100 question, computer-administered exam. National exams are given throughout the year at local testing centers

Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required; an undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.

Each designee who falls in one of the following categories must complete 30 hours of continuing education every two years. If you do not fall into one of these categories, you are exempt from CE requirements:

- Licensed insurance agent/broker/consultant
- Licensed security representative/registered investment advisor
- Financial consultant, attorney, accountant, employee benefits specialist, and any other individual who provides insurance, employee benefits, financial planning, or estate planning advice and counsel to the public

Item 3 Disciplinary Information

Alan R. Mollot has not been the subject of any legal or disciplinary event.

Item 4 Other Business Activities

In addition to his association with Mollot & Hardy, Inc., Mr. Mollot is a registered representative and investment advisor representative of FSC Securities Corporation (“FSC”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. He is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

If Mr. Mollot performs services for you as a registered representative or investment advisor representative of FSC, Mr. Mollot may receive commissions or other compensation from the sale of securities and insurance products and services to you. For example, Mr. Mollot may receive 12b-1 fees, which are fees paid by mutual fund companies for the on-going marketing of their investment products.

Mr. Mollot may also recommend various asset management firms through his affiliation with FSC. If you establish an investment advisory relationship with one of these firms, Mr. Mollot may share in the advisory fees you pay to these asset management firms.

This additional compensation may present a conflict of interest because it creates an incentive to recommend products and services based upon compensation, rather than on your needs. Mr. Mollot will explain the costs associated with any recommendations he makes. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents.

Item 5 Additional Compensation

Mr. Mollot receives additional compensation for his activities as a registered representative and investment advisor representative of FSC and as an insurance agent. This may also include applicable sales awards and other prizes. This compensation is described under “Other Business Activities” above.

Item 6 Supervision

Mr. Mollot owns Mollot & Hardy, Inc. and functions as the President and Chief Compliance Officer. Mr. Mollot is primarily responsible for overall management of the firm and supervision of the advisory representatives. Michael J. Hardy, who helps supervise the advisory representatives, is Vice President, and can be reached at 716.691.7718.

These two individuals review and monitor each other’s activities as they relate to advice provided to advisory clients, including transactions effected for client accounts, through periodic review of reports and frequent communications related to client portfolio investments and activity.

Additionally we supervise Mr. Mollot by requiring that he adhere to our processes and procedures as described in our firm’s *Code of Ethics* and *Compliance Procedures*.

Michael J. Hardy

Mollot & Hardy, Inc.

646 North French Road

Suite 9

Amherst, NY 14228

716.691.7121

www.mollot.com

ADV Part 2B
Brochure Supplement

March 1, 2018

This brochure supplement provides information about Michael J. Hardy that supplements the Mollot & Hardy, Inc. brochure. You should have received a copy of that brochure. Please contact Alan R. Mollot, President and Chief Compliance Officer if you did not receive Mollot & Hardy, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Michael J. Hardy, CRD Number 4432234, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Michael J. Hardy

Year of birth: 1977

Formal education:

- Canisius College – 2000; B.S., Business Management
- Certified Financial Planner Board of Standards – 2007; Certified Financial Planner

Business background:

- Molloy & Hardy, Inc. – Advisory Representative; (2011 – Present)
- FSC Securities Corporation – Registered Representative; (02/09 – Present)
- Advantage Capital Corp. – Registered Representative Advisory Representative; (2001 – 02/09)

Professional Designations

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP

Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 Disciplinary Information

Michael J. Hardy has not been the subject of any legal or disciplinary event.

Item 4 Other Business Activities

In addition to his association with Mollot & Hardy, Inc., Mr. Hardy is a registered representative and investment advisor representative of FSC Securities Corporation ("FSC"), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. He is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

If Mr. Hardy performs services for you as a registered representative or investment advisor representative of FSC, Mr. Hardy may receive commissions or other compensation from the sale of securities and insurance products and services to you. For example, Mr. Hardy may receive 12b-1 fees, which are fees paid by mutual fund companies for the on-going marketing of their investment products.

Mr. Hardy may also recommend various asset management firms through his affiliation with FSC. If you establish an investment advisory relationship with one of these firms, Mr. Hardy may share in the advisory fees you pay to these asset management firms.

This additional compensation may present a conflict of interest because it creates an incentive to recommend products and services based upon compensation, rather than on your needs. Mr. Hardy will explain the costs associated with any recommendations he makes. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents.

Item 5 Additional Compensation

Mr. Hardy receives additional compensation for his activities as a registered representative and investment advisor representative of FSC and as an insurance agent. This may also include applicable sales awards and other prizes. This compensation is described under “Other Business Activities” above.

Item 6 Supervision

Mr. Hardy is supervised by Alan R. Mollot, President and Chief Compliance Officer. Mr. Mollot can be reached at 716.691.7121.

We supervise Mr. Hardy by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. Hardy gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Hardy is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

Bryan Castro

Mollot & Hardy, Inc.

646 North French Road

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ADV Part 2B
Brochure Supplement

March 1, 2018

This brochure supplement provides information about Bryan Castro that supplements the Mollot & Hardy, Inc. brochure. You should have received a copy of that brochure. Please contact Alan R. Mollot, President and Chief Compliance Officer if you did not receive Mollot & Hardy, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Bryan Castro, CRD Number 4707368, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Bryan Castro

Year of birth: 1975

Formal education:

- University of Rochester – 1998; B.A., Psychology
- State University of New York at Buffalo – 2001, M.A., Education
- Certified Financial Planner Board of Standards – 2006; Certified Financial Planner

Business background:

- Molloy & Hardy, Inc. – Advisory Representative; (02/10 – Present)
- FSC Securities Corporation – Registered Representative; (01/10 – Present)
- Cadaret, Grant & Co., Inc. – Registered Representative (08/06 – 01/10)
- Clearplan Financial – Financial Planner (2006 – 2009)
- Waddell & Reed, Inc. – Registered Representative (10/03 – 08/06)

Professional Designations

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning

services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 Disciplinary Information

Bryan Castro has not been the subject of any legal or disciplinary event.

Item 4 Other Business Activities

In addition to his association with Mollot & Hardy, Inc., Mr. Castro is a registered representative and investment advisor representative of FSC Securities Corporation ("FSC"), a registered broker/dealer, member FINRA/SIPC, and registered investment

adviser. He is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

If Mr. Castro performs services for you as a registered representative or investment advisor representative of FSC, Mr. Castro may receive commissions or other compensation from the sale of securities and insurance products and services to you. For example, Mr. Castro may receive 12b-1 fees, which are fees paid by mutual fund companies for the on-going marketing of their investment products.

Mr. Castro may also recommend various asset management firms through his affiliation with FSC. If you establish an investment advisory relationship with one of these firms, Mr. Castro may share in the advisory fees you pay to these asset management firms.

This additional compensation may present a conflict of interest because it creates an incentive to recommend products and services based upon compensation, rather than on your needs. Mr. Castro will explain the costs associated with any recommendations he makes. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents.

Item 5 Additional Compensation

Mr. Castro receives additional compensation for his activities as a registered representative and investment advisor representative of FSC and as an insurance agent. This may also include applicable sales awards and other prizes. This compensation is described under “Other Business Activities” above.

Item 6 Supervision

Mr. Castro is supervised by Alan R. Mollot, President and Chief Compliance Officer. Mr. Mollot can be reached at 716.691.7121.

We supervise Mr. Castro by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. Castro gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,

- Perform annual oversight so that Mr. Castro is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

Sanford G. Seide

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ADV Part 2B
Brochure Supplement

March 1, 2018

This brochure supplement provides information about Sanford G. Seide that supplements the Mollot & Hardy, Inc. brochure. You should have received a copy of that brochure. Please contact Alan R. Mollot, President and Chief Compliance Officer if you did not receive Mollot & Hardy, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Sanford G. Seide, CRD Number 1037938, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Sanford G. Seide

Year of birth: 1940

Formal education:

- American Institute of Banking – 1962, Pre Standard Certificate
- Monroe County Community College – 1964; Certificate of Completion
- State University of New York at Buffalo – 1967; B.S., Education
- American College – 1989; Chartered Life Underwriter
- Life Underwriter Training Council – 1986; Life Underwriter Training Council Fellow

Business background:

- Molloy & Hardy, Inc. – Advisory Representative; (1982 – Present)
- FSC Securities Corporation – Registered Representative; (02/09 – Present)
- Advantage Capital Corp. – Registered Representative Advisory Representative; (1977 – 02/09)

Professional Designations

CLU

The Chartered Life Underwriter® (CLU) designation is a professional credential offered to persons through the CLU program that provides insights into the life insurance business, its importance to the economy, its operation and distribution systems, and its resurging importance for safe and secure investments.

Candidates must pass an examination for the following five required courses and three elective courses to earn the designation:

Required Courses

- Fundamentals of Insurance Planning
- Individual Life Insurance
- Life Insurance Law
- Fundamentals of Estate Planning
- Planning for Business Owners and Professionals

Elective Courses

- Financial Planning: Process and Environment
- Individual Health Insurance
- Income Taxation
- Group Benefits
- Planning for Retirement Needs
- Investments
- Estate Planning Applications

Candidates must pass a test that is a two-hour, 100 question, computer-administered exam. National exams are given throughout the year.

Candidates must meet experience requirements and ethical standards, including three years of business experience immediately preceding the date of use of the designation are required; an undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience and, when using formal education as qualifying experience, the remaining two years must immediately precede the date of the award.

Each designee who falls in one of the following categories must complete 30 hours of continuing education every two years. If you do not fall into one of these categories, you are exempt from CE requirements:

- Licensed insurance agent/broker/consultant
- Licensed security representative/registered investment advisor
- Financial consultant, attorney, accountant, employee benefits specialist, and any other individual who provides insurance, employee benefits, financial planning, or estate planning advice and counsel to the public

Life Underwriters Training Council Fellow (“LUTCF”)

LUTCF Overview

The LUTCF (Life Underwriters Training Council Fellow) designation is jointly conferred by the National Association of Insurance and Financial Advisors (NAIFA) and The American College. The LUTCF designation represents accomplishment and professionalism, helping life insurance professionals to establish strong and lasting client relationships. Since its inception, the LUTCF designation has been awarded to more than 63,000 individuals—including designees who earned it since the College assumed ownership of the designation curriculum from the Life Underwriters Training Council.

The LUTC program courses focus on fundamental product and service concepts that are essential to your long-term success. Topics in the program include:

- Basic planning concepts and needs applicable to the personal insurance market;
- Effective communication skills;
- Identify target markets, prospect, fact finding, sales presentations, and policy services;
- Life-cycle segmentation;
- Examining the needs of the senior market; and
- Products and services such as:
 - Disability income insurance;
 - Business insurance;
 - Employee benefits policies;
 - Long-term care insurance;
 - Annuities;
 - Retirement plans;
 - Social insurance; and
 - Trust and estate planning.

Item 3 Disciplinary Information

Sanford G. Seide has not been the subject of any legal or disciplinary event.

Item 4 Other Business Activities

In addition to his association with Mollot & Hardy, Inc., Mr. Seide is also registered representatives and investment adviser representatives of FSC Securities Corporation (“FSC”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. He is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

If Mr. Seide performs services for you as a registered representative or investment advisor representative of FSC, Mr. Seide may receive commissions or other compensation from the sale of securities and insurance products and services to you. For example, Mr. Seide may receive 12b-1 fees, which are fees paid by mutual fund companies for the on-going marketing of their investment products.

Mr. Seide may also recommend various asset management firms through his affiliation with FSC. If you establish an investment advisory relationship with one of these firms, Mr. Seide may share in the advisory fees you pay to these asset management firms.

This additional compensation may present a conflict of interest because it creates an incentive to recommend products and services based upon compensation, rather than on your needs. Mr. Seide will explain the costs associated with any recommendations he makes. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents.

Item 5 Additional Compensation

Mr. Seide receives additional compensation for his activities as a registered representative and investment advisor representative of FSC and as an insurance agent. This may also include applicable sales awards and other prizes. This compensation is described under “Other Business Activities” above.

Item 6 Supervision

Mr. Seide is supervised by Alan R. Mollot, President and Chief Compliance Officer. Mr. Mollot can be reached at 716.691.7718.

We supervise Mr. Seide by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. Seide gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Seide is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

Peter M. Ferriello

Mollot & Hardy, Inc.

***646 North French Road
Suite 9
Amherst, NY 14228
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www.mollot.com

ADV Part 2B
Brochure Supplement

March 1, 2018

This brochure supplement provides information about Peter M. Ferriello that supplements the Mollot & Hardy, Inc. brochure. You should have received a copy of that brochure. Please contact Alan R. Mollot, President and Chief Compliance Officer if you did not receive Mollot & Hardy, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Peter M. Ferriello, CRD Number 4970081, is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Peter M. Ferriello

Year of birth: 1984

Formal education:

- Alfred University – 2006; B.A. Communication

Business background:

- Mollot & Hardy, Inc. – Vice President, Advisory Representative; (05/16 – Present)
- FSC Securities Corporation – Registered Representative, Advisory Representative; (05/16 – Present)
- J.P. Morgan Securities LLC – Private Client Advisor-VP; (05/08 – 05/16)

Item 3 Disciplinary Information

Peter M. Ferriello has not been the subject of any legal or disciplinary event.

Item 4 Other Business Activities

In addition to his association with Mollot & Hardy, Inc., Mr. Ferriello is also registered representatives and investment adviser representatives of FSC Securities Corporation (“FSC”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. He is also a licensed insurance agent offering insurance products and services through unaffiliated insurance companies.

If Mr. Ferriello performs services for you as a registered representative or investment advisor representative of FSC, Mr. Ferriello may receive commissions or other compensation from the sale of securities and insurance products and services to you. For example, Mr. Ferriello may receive 12b-1 fees, which are fees paid by mutual fund companies for the on-going marketing of their investment products.

Mr. Ferriello may also recommend various asset management firms through his affiliation with FSC. If you establish an investment advisory relationship with one of

these firms, Mr. Ferriello may share in the advisory fees you pay to these asset management firms.

This additional compensation may present a conflict of interest because it creates an incentive to recommend products and services based upon compensation, rather than on your needs. Mr. Ferriello will explain the costs associated with any recommendations he makes. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents.

Item 5 Additional Compensation

Mr. Ferriello receives additional compensation for his activities as a registered representative and investment advisor representative of FSC and as an insurance agent. This may also include applicable sales awards and other prizes. This compensation is described under “Other Business Activities” above.

Item 6 Supervision

Mr. Ferriello is supervised by Alan R. Mollot, President and Chief Compliance Officer. Mr. Mollot can be reached at 716.691.7718.

We supervise Mr. Ferriello by requiring that he adhere to our processes and procedures as described in our firm’s Code of Ethics. We will monitor the advice that Mr. Ferriello gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Ferriello is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.