

1. Introduction

Our name is Smith Affiliated Capital Corp. We are registered with the Securities and Exchange Commission as an investment adviser. The services offered and fees charged by an investment adviser differ from those of broker-dealers and it is important that you understand the differences. Free and simple tools are available to research investment adviser firms, broker-dealers, and their financial professionals at www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

2. Relationships and Services

What investment services and advice can you provide me? We offer investment advisory services to retail investors. The principal investment advisory services that we offer to retail investors are through separately managed accounts (“accounts”). There are no material limitations on our services. Our services can be tailored to meet a client’s imposed near and long-term liabilities, cash management, liquidity or asset allocation restrictions. We monitor your investments on a continuous basis and conduct regular account reviews to ensure that the advisory services are consistent with your needs and objectives. Monitoring of your investments is offered as part of our standard services. In most instances, our investment management agreement with you gives us the authority to buy and sell investments on your behalf. We also provide non-discretionary advisory services to clients on a wide variety of topics. We generally focus on taxable and tax-exempt fixed income securities as well as equity investments using individual stocks and ETFs. Our investments are long only strategies and do not incorporate the use of leverage, options, futures or below investment grade bonds. Although we do not have any standard minimum requirements for you to open or maintain an account with us, we reserve the right to impose a minimum account size for certain investment strategies in order to open an account. ***Please see the more detailed disclosure on the investment services and advice that we can provide to you in Items 4 and 7 of our Form ADV Part 2A or which is available at <https://adviserinfo.sec.gov/firm/summary/107675>.***

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

3. Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay? You will pay us an asset-based fee ranging from 0.20% to 0.75% of the net assets in your account each year. Because we charge an asset-based fee, the more assets there are in your advisory account, the more you will pay in fees, and we therefore have an incentive to encourage you to increase the assets in your account. You will also pay other fees and costs, including custodian fees, brokerage fees, third party investment managers and other third parties such as fees charged by managers, commissions, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts, securities transactions costs, and other expenses which shall be incurred by a client. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. ***Please make sure you understand what fees and costs you are paying. Please see the more detailed disclosure on our fees and costs in Item 5 of our Form ADV Part 2A, which is available at <https://adviserinfo.sec.gov/firm/summary/107675>.***

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

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. The following arrangements and activities give us an incentive to make investments for you based on our own interests rather than on your needs.

- **Broker Selection.** When we choose broker-dealers to execute your transactions, we consider the research, products and services that we receive from broker-dealers and whether we receive client referrals from broker-dealers. This may affect our duty to obtain best execution on your transactions. We have adopted policies and procedures to ensure that our broker selection practices do not conflict with the interests of our clients or our duty to obtain best execution.
- **Personal Trading.** We invest personally in the same (or related) securities that we recommend to you. We also buy or sell securities for you at or about the same time that we buy or sell the same securities for our own accounts. This gives us an incentive to favor our own accounts over your account. We have adopted personal trading policies and procedures to ensure that our personal trading practices do not conflict with the interests of our clients.

Conversation Starters. How might your conflicts of interest affect me, and how will you address them?

Please see the more detailed disclosure on our conflicts of interest in Items 6, 11, 12 and 17 of our Form ADV Part 2A, which is available at <https://adviserinfo.sec.gov/firm/summary/107675>.

How do your financial professionals make money? We pay our financial professionals the following compensation: We pay our financial professionals a salary. Our financial professionals may be paid an additional salary that varies based on the firm's overall financial performance, which may give them an incentive to make riskier investments. However, our financial professionals are not compensated based on the performance of any particular portfolio investments.

4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history? No. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starters. As a financial professional, do you have any disciplinary history? For what type of conduct?

5. Additional Information

You can find additional information about our investment advisory services at <http://www.sec.gov/> and on our website smithcapital.com. You can request up to date information and a copy of our relationship summary by contacting us at 212-644-9440.

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