Client Relationship Summary

Westrock Capital Management, Inc. is registered with the Securities and Exchange Commission ("SEC") as a retail broker-dealer since July 1st, 1996. We are a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (www.sipc.org). The company is not a registered investment advisory firm. As a retail Brokerage firm as oppose to investment advisory services, Westrock charges trading commissions instead of advisory fees which is a unique feature of investment advisory firms. This Client Relationship Summary provides details about our brokerage firm's commissions, fees, and other important information **Please visit https://brokercheck.finra.org** for a free and simple search tool to research our firm and financial professionals**.** This Client Relationship Summary (CRS) and the Summary of Programs and Services provide an overview of our primary programs, the types of services we provide and how you pay.

What investment services and advice can you provide me?

Services: Westrock offers only brokerage services to its retail investors. Westrock's principal brokerage services include buying and selling securities on a solicited and unsolicited basis. In a Westrock brokerage account, you pay commissions and other sales fees on a per transaction basis. We may recommend investments to you, but you make the final decision to buy, sell or hold them. Westrock does not provide any investment advisory services including, for example, financial planning or wrap fee programs to its retail investors.

Conversation Starters. Ask your financial professional these questions to learn more:

- **Given my financial situation, should I choose a brokerage 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?**

Monitoring: Westrock voluntarily review the holdings of its retail customers' accounts for the purposes of determining whether to provide a recommendation to the customer. This voluntary review is not considered to be "account monitoring," and not meant to create an implied agreement with the customer to monitor the account.

Investment Authority: Westrock manages all investment accounts on non-discretionary basis. Whereby we will provide recommendation, but you will ultimately decide which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis. Also, you can trade according to your philosophy and objective of your investment strategy.

Account Minimums and Other Requirements Westrock does not require any minimum amount to open or maintain brokerage accounts with the exception of margin accounts**. Margin account rules** are based on clearing firm's requirement A margin account involves an extension of credit to you in connection with your securities account. Initial margin requirements established by the Board of Governors of the Federal Reserve specify the minimum amount of collateral you must provide when you buy securities on margin.

Limited Investment Offerings Westrock neither participates in Investment offerings nor it offers any proprietary manufactured products except mutual funds. Mutual fund charges are disclosed in the individual companies' prospectus. Westrock does not have revenue sharing arrangements, and does not participate in principal trading.

What fees will I pay?

Westrock does not charge brokerage account fees other than transaction-based fees (also known as commissions) **maximum to an extent of 5% whether you make or lose money. In general, 0.50 mark-up for 'buy per share' (Ex: If you bought 1 share of XYZ stock for $125.00, it will cost you $125+.50= $125.50 net plus handling fee, if any) or $1.00 mark down for 'sale per share' basis (Ex: If you sold 1 share of XYZ stock for $125.00, you will receive net $125-.50= $124.50 less handling fee, if any) or straight commission.** However, we assess transactional fees in retail investor accounts. Generally, fees are assessed on a transactional basis. The below are examples of common transaction fees charged:

- Wire transfer fees,
- Account transfer fees,
- Stock reorganization fees,
- Inactivity fees.

Important: 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.

For additional information please contact us at 845-371-8800.

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

Westrock does provide recommendations on a limited basis based on the available market information. When we act as your representative as a broker, we have to act in your **best interest** and not put our interest ahead of yours.

How do your financial professionals make money?

Standard of Conduct and Conflict of Interest:

How are we paid?

BROKERAGE COMPENSATION Our brokerage services are primarily compensated based on commissions and other types of transaction fees and service charges related to transactions in your brokerage accountant and **this is a conflict of interest.** The more transactions in your account, the more fees we charge you. We therefore have an incentive to encourage you to engage in transactions.

Commissions. The fees you pay is based on specific transaction and not the value of your account. We get commissions when you buy or sell securities. Sometimes we also get payments from third parties. Example: mutual fund commissions and trailers which does not have any effect on the value of your mutual fund balance. Additional information about our fees is described below in our Firm Brochure. Our Firm Brochure is available upon request by calling the number below.

Conversation Starter –

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

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

Overview of brokerage fees: When we are paid commission by you, we do have conflict of interest by charging commission (**In general, $0.50 mark-up for buy per share or $1.00 mark down for sale per share basis or straight commission**) to you. Therefore, more transactions in your account, the more transaction fees we charge you. When we charge commissions on trades, we monitor to make sure that commission does not exceed FINRA 5% guideline.

Third-party payments: We receive compensation from investments such as mutual funds or other manufactured products, we have built in conflicts and we must tell you at the time of sell or solicitation about that recommendation to disclose that conflict of interest. With mutual funds, this fee (typically called a "load") reduces the value of your investment.

What about care?

The Care Obligation In nutshell, when we provide service to you, we must treat you fairly and comply with a number of specific obligations. It requires broker-dealers to exercise reasonable diligence, care, and skill when making a recommendation that is in the best interest of a retail customer, taking into account their investment profile, the risks, rewards, and costs When we provide you with a recommendation as your broker-dealer, 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.

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

Yes. For additional information, please visit FINRA website FINRA Website Address—www.finra.org to research our financial professionals. Please note that our firm, Westrock Capital Management, Inc. does not have legal or disciplinary events**.**

Conversation Starter –

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

For additional information, you can visit https://brokercheck.finra.org **for a free and simple search tool to research our firm and financial professionals.**

Conversation Starter –

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

For additional information.	**You can find additional information about our firm by visiting** https://brokercheck.finra.org **for a free and simple search tool to research our firm and financial professionals by searching CRD# 43871 or by calling FINRA Broker CHECK HOTLINE NUMBER- (800)289-9999; FINRA Website Address—www.finra.org** **You may also contact Mr. Robin Bhattacharya your financial representative for more information at 845-371-8800 ext. 6. For the latest copy of this relationship summary or for a copy of the Best Interest Disclosure Statement, please go to**: http://www.westrockcapitalmanagement.com/