

Hurley Capital, LLC – Form CRS

Hurley Capital, LLC (“we”, “our”, or “us”) is registered with the U.S. Securities and Exchange Commission (“SEC”) as an investment adviser. Our services and compensation structure differs from that of a registered broker-dealer. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing. Information in text boxes below are intended to be conversation starters for you to have with us and are required by the instructions to Form CRS.

What investment services and advice can you provide me?

We provide discretionary investment management services to various clients, including individuals and their trusts (our “retail investors”). If requested, we also provide general financial planning and consulting services.

We first determine your investment objective, and then invest according to your investment objectives. Once invested, we monitor your account performance, and may make changes as necessary based on these reviews.

We provide our services on a discretionary basis, which means we have the authority to buy and sell investments in your account without speaking to you prior to doing so. You can place reasonable restrictions on the securities and types of securities that we buy by notifying us, in writing.

We generally use individual equity and debt securities, exchange-traded funds (“ETFs”), options and mutual funds, although we may use other securities.

We generally require a minimum portfolio size of \$250,000 for our services.

For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please See Items 4 and 7, respectively in our [Form ADV Part 2A](#).

<i>Conversation Starter: Given my financial situation, should I choose an investment advisory service? Why or why not?</i>
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<i>Conversation Starter: How will you choose investments to recommend to me?</i>
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<i>Conversation Starter: What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i>
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What fees will I pay?

Our annual investment management fee is generally equal to 1.5% of the market value of your assets under our management. In certain instances, we may agree to a performance-based fee, which involves a base fee and a performance fee component. We deduct our fee from one or more of your investment accounts on a quarterly basis, in arrears, based upon the market value of your assets under our management on the last business day of the previous quarter. Because our fee is based on the amount of your assets under our management, the more assets you entrust us to manage, the more you will pay us for our services. Therefore, we have an incentive to encourage you to increase the amount of assets that you entrust to us.

Your account will be held with a qualified custodian. Custodians generally charge transaction fees for effecting certain securities transactions. In addition, if your assets are invested in mutual funds or ETFs, you will bear your pro rata share of the investment management fees and other fees of the funds, which would be in addition to the fees you pay us. These fees and expenses are described in each fund’s prospectus and potentially include a management fee, distribution fee, and other fund expenses. 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.

Conversation Starter: Help me understand how these fees and costs might affect my investments. If I give you \$250,000 to invest, how much will go to fees and costs, and how much will be invested for me?

For more detailed information about our fees and costs related to our management of your account, please See Item 5 in our [Form ADV Part 2A](#).

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:

- * Certain of our employees are licensed insurance agents and will earn commission-based compensation for selling insurance products. These fees are in addition to our advisory fees and creates an incentive for them to recommend insurance products.
- * We recommend a particular custodian from whom we receive support services. This presents a conflict of interest, because our receipt of their support make us more inclined to continue using and recommending them.
- * We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee. If we don't currently manage your account held with your employer's plan, this will increase our compensation.

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

For more detailed information about our conflicts of interest, please review Item 5 of our [Form ADV Part 2A](#).

How do your financial professionals make money?

Our portfolio manager is the sole equity owner of the firm, receives a salary, and stands to receive the profits of the firm. Our other employees receive a salary and stand to receive discretionary bonuses.

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

No. We encourage you to visit www.Investor.gov/CRS to research our firm and our financial professionals. Furthermore, we encourage you to ask your financial professional:

Conversation Starter: As a financial professional, do you have any disciplinary history? If so, for what type of conduct?

Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer at any time to request a current copy of your Form ADV Part 2A or our *relationship summary*. Our Chief Compliance Officer may be reached by phone at (212) 605-0665.

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?