

1. Introduction

SogoTrade, Inc. (SogoTrade, we, our or us) is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors, and investing.

2. What investment services and advice can you provide me?

We offer brokerage services to retail investors, including buying and selling securities such as stocks, ETFs and options, and margin trading. We offer mutual funds and or fixed income securities only through broker-assisted trading. We do not offer our own securities products.

- SogoTrade does not offer investment advice and we do not recommend trades in specific securities or funds to you.
- We act as your broker in connection with any transaction we execute for your account, and not as your investment adviser or fiduciary.
- We do not provide investment monitoring services for your account(s).
- Margin accounts have a \$2000 minimum otherwise no minimum account funding or maintenance size applies although we may close accounts that are unfunded or dormant.
- All activity in your brokerage account is conducted on a nondiscretionary basis, meaning you make the ultimate decision with regard to buying, selling, or holding any investments.
- We are an introducing broker-dealer. Your cash and securities will be custodied by Apex Clearing Corp., which services your account by executing, clearing and settling your trades; preparing and distributing your account statements and trade confirmations; and extending credit to margin accounts.

SogoTrade’s affiliate, MarketRiders, Inc. (dba SogoTrade Asset Management (“SAM”)), is registered with the SEC as an investment advisor. Form CRS for SAM can be reviewed by following this link: [SAM Form CRS](#).

For additional information about our products and services, please visit our homepage at <https://www.sogotrade.com>.

Conversation Starters: Ask your financial professional—

- **Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of 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?**

3A. What fees will I pay?

- The principal fees and costs you will incur for brokerage services are transaction-based charges when buying or selling securities, which are generally assessed on a transaction-by-transaction basis. These generally include commissions and commission equivalents. You may also incur fees and charges for custodial or administrative services, as well as fees and expenses embedded within fund products.
 - Our standard retail brokerage customers pay \$2.88 commissions for online U.S. exchange listed stock, ETF and options trades. Our retail brokerage customers who participate in the “Get Paid to Trade” program pay \$2.88 for market orders, no commission for limit orders, and may qualify to receive a payment or credit on qualified limit orders. All customers pay a \$0.50 per contract fee for options trades.
 - Margin trading allows you to leverage assets to increase your buying power. Margin interest rates vary depending on the base rate and the size of your debit balance. We may adjust the base rate at our discretion.
 - All trades are through third parties. Retail accounts pay certain fees for account services and for regulatory fees we pass on to our customers.
 - Even with our \$0 commissions, SogoTrade makes money on your trades, such as from order routing revenue. Typically, the more you trade, the more money we make.
 - You will pay underlying management fees (expense ratio) or other charges for ETFs you purchase, which are explained in more detail in the ETF’s prospectus.
- You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount you make on your investments over time. Please make sure you understand what fees and costs you are paying. Actual transaction costs will be shown on the trade confirmations sent to you. **For additional information** about the fees, margin rates and costs for brokerage services, please see our Pricing available at <https://sogotrade.com/commissions-and-fees.aspx>. For additional information and qualifications on our “Get Paid to Trade” program, please see <https://sogotrade.com/GP2T.aspx>.

Conversation Starters: Ask your financial professional—

- **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?**

3B. What are your legal obligations to me with respect to providing recommendations as my broker-dealer? How else does your firm make money and what conflicts of interest do you have?

We do not provide you with recommendations as your broker-dealer nor do we act as your investment advisor. All of the trades you make are conducted on a self-directed basis. Regardless, the way we make money creates some conflicts with your interests. Here are some examples to help you understand what this means:

- We receive order routing revenue from the third-party market centers to which we route our customer orders, and therefore we have an incentive for you to trade more. Order routing revenue is a component of our transaction-based revenues. The material aspects of our relationship with each venue, including payment for order flow arrangements, can be found in the SEC Rule 606 Disclosures at <https://sogotrade.com/SEC.aspx>. Therefore, we have a financial incentive to direct our customer orders to the market centers that provide payments or rebates to us, subject to our best execution requirements. You should also understand that our order flow revenue provides the source by which we pay or credit you for qualified limit orders.
- We make money if you borrow against the securities in your account by way of a margin loan. That is because we make a spread between the rate we pay for the money we lend you and the rate you pay to us for the loan.
 - We make money in the form of interest on uninvested cash in your account.
 - Some of our registered representatives may be dually registered or employed by us and our affiliate, SAM. We manage this potential conflict so that it does not affect your dealings with these companies.

For additional information, please visit our important documents page at <https://sogotrade.com/forms-center.aspx>.

Conversation Starters: Ask your financial professional—

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

3C. How do your financial professionals make money?

Our registered representatives are compensated through a base salary and may receive periodic bonuses based on certain metrics, such as job performance and profitability as a company. They may also receive modest compensation for referrals to SAM. As a result, our registered representatives have an incentive to have you consider asset management services through SAM.

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

Yes. Visit Investor.gov/CRS or Brokercheck for a free and simple search tool to research us and our financial professionals. SogoTrade’s CRD number is 17912.

Conversation Starters: Ask your financial professional—

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

5. Additional Information

For additional information about our brokerage services and to obtain a copy of this relationship summary, please visit us at <https://sogotrade.com/forms-center.aspx> or call one of our specialists at **646-885-6486**.

Conversation Starters: Ask your financial professional—

- **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?**