We are registered with the U.S. Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at http://investor.gov/crs, which also provides educational materials about broker-dealers, investment advisers and investing.

What investment services and advice can you provide me?

Our firm offers investment advisory services, which are fully described in our Form ADV Part 2A ("Disclosure Brochure"). Our services include investment management and advisory services for individuals, charitable organizations, corporations and other business entities as well as participant directed 401k's and services for nonqualified deferred compensation plans. As part of our standard investment management services, we monitor investments that we manage on a continuous and ongoing basis. There are no material limitations to our monitoring. We accept discretionary authority to implement the recommended transactions in client accounts. The level of discretion is determined in our agreement and there are no material limitations on the authority. We do not offer advice only with respect to proprietary products. We offer an ETF Model Strategy in which client assets are invested primarily in exchange-traded funds ("ETFs") through a series of proprietary models managed by SGAM. In addition, the Firm has a fixed-income only offering (the Fixed Income Strategy) in which client assets are invested in individual debt offerings and exchange traded funds.

Additional information about our services can be found in Items 4, 5 and 7 of our Disclosure Brochure and is available to all clients by going here: https://adviserinfo.sec.gov/firm/summary/288981.

Let's discuss…

- *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?*

What fees will I pay?

We offer our services on a fee basis. We charge a fee based upon assets under management for investment management and wealth management services. We charge a fee based upon assets under advisement for certain clients where we do not actively manage the assets. For ongoing services, the annual fee is prorated and charged quarterly.

In addition to the advisory fees paid to us, you also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities brokerage commissions, transaction fees, custodial fees, margin costs (the Firm does not use leverage in client accounts, but clients may use margin for other needs), charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

The more assets there are in your advisory accounts, the more you will pay in fees, so the firm may therefore have an incentive to encourage you to increase the assets in your account or manage them in a way where we charge higher fees. 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. **Additional information about our fees can be found in Item 5 of our Disclosure Brochure and is available to all clients by going here:** https://adviserinfo.sec.gov/firm/summary/288981.

Let's discuss… *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.

- Support from Custodian: We receive administrative support, computer software, related systems support, as well as other third party support from the custodian that we recommend. This results in an incentive to recommend that custodian because we do not have to produce or pay for the products or services provided.

Let's discuss… *How might your conflicts of interest affect me, and how will you address them?*

Additional information about our conflicts of interest can be found throughout our Disclosure Brochure and is available to all clients by going here: https://adviserinfo.sec.gov/firm/summary/288981.

How do your financial professionals make money?

Our financial professionals are compensated based on the following factors and conflicts of interest:

- Revenue the firm earns from the financial professional's advisory services or recommendations. This results in an incentive to take steps to maximize revenue to the firm.
- Fees for referrals of clients to the firm.
- Direct or indirect compensation received from Empower Financial Services, Inc. ("Empower"). Our financial professionals can receive compensation due to the firm's relationship with Empower for recordkeeping services which results in an incentive to recommend Empower.

Additional information about our financial professionals can be found on their respective Form ADV Part 2 Brochure Supplements that you will be provided.

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

No, neither we nor our financial professionals have a legal or disciplinary history. You can visit http://investor.gov/crs for a free and simple search tool to research us and our financial professionals.

Let's discuss… *As a financial professional, do you have any disciplinary history? For what type of conduct?*

You can find additional information about our services on our website at http://www.sgassetmgt.com and in our Disclosure Brochure. To request a copy of this Relationship Summary and any of our other disclosure documents referred to in this document, please email us at info@sgassetmgt.com or call us at (501) 246-7500.

Let's discuss… *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?*