



# SARGENT

INVESTMENT GROUP

## FORM CRS — CUSTOMER RELATIONSHIP SUMMARY AS OF March 31, 2021

Sargent Investment Group, LLC (“SIG”, “us”, “we” or the “Firm”), is providing this Customer Relationship Summary as a requirement under Regulation Best Interest (effective date June 30, 2020). SIG also does business as Sargent Investment Group. Throughout this summary we have called out some “conversation starters” which you may want to discuss with us and are identified throughout this document. SIG is a federally registered investment advisor with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available for you to research SIG and our financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisors and investing.

### WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

SIG offers investment advisory services to retail investors in the form of discretionary and non-discretionary managed investment accounts and investment/financial planning. Our Firm’s investment management services are also made available as part of a Wrap Fee Program. Under our Wrap Fee Program, SIG manages client accounts for a single, all-inclusive fee that compensates us for investment advisory services and includes brokerage commission costs of the custodian. SIG charges the same fee to clients outside of the Wrap Fee Program as they do to clients in the Wrap Fee Program.

All managed accounts are continually monitored by us and are managed consistent with a client’s agreed upon investment objective. SIG’s investment management services include the selection of securities for client investment portfolios and the ongoing monitoring and management of client accounts. These services also include a formal review that is conducted with clients no less frequently than annually. For accounts deemed discretionary, we make investment decisions on your behalf, according to your investment objective, without obtaining your consent prior to each transaction. We will also provide non-discretionary management services, in which we will provide ongoing monitoring of your investments but will contact you with recommendations and allow you to make the ultimate decision regarding the purchase or sale of investments.

In providing our services, we offer advice across all investments, without limitation, though the majority of our advice is provided in respect to individual equities, individual fixed-income securities, mutual funds, exchange traded funds, external managers and privately offered funds. SIG requires that investment management clients maintain a minimum balance of \$500,000, subject to exceptions under certain circumstances.

The financial plans prepared by SIG are Individualized for clients and can include one or more of the following activities: investment analysis and planning, retirement planning, business and personal financial planning, and distribution strategy and analysis. We also offer consulting services, including recommendations regarding asset allocations and reviews of existing portfolios and investments and investment recommendations.

*These services are more particularly described in Items 4 and 7 of the Firm’s Form ADV, Part 2A (the “Brochure”) and in Items 4 and 5 of the Wrap Fee Program Brochure, which is a supplement to the Form ADV, Part 2A (the “Wrap Fee Brochure”).*

### WHAT FEES WILL I PAY?

For discretionary and non-discretionary managed accounts, SIG charges ongoing quarterly fees in advance, based on a percentage of the fair market value of your assets under management at the end of the previous calendar quarter, subject to a minimum fee of \$500 per household per year.

### 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?*

Clients that engage us for investment consulting services are billed a one time or quarterly flat fee to be determined with each engagement. The fees related to your specific account will be defined in your investment advisory contract and our SIG Brochure.

SIG can waive any minimum fee and/or charge a lesser fee based upon certain criteria such as anticipated future assets, type of assets being managed, related accounts, the type of services offered, etc. As noted above, the all-inclusive fee under our Wrap Fee Program will include the brokerage transaction costs charged by the custodian of your assets. The custodian currently only charges brokerage on certain securities transactions which are further defined in SIG's Wrap Fee Brochure. Clients not in the Wrap Fee Program will bear any brokerage costs directly from the custodian. All clients will incur certain other service and administrative fees charged by the custodian not related to broker transaction costs, for example, markups or markdowns, wire transfer or regulatory fees. Fees paid to SIG are separate and distinct from the management fees and expenses charged by mutual funds and exchange-traded funds to their shareholders as well as by third-party and private fund investment managers, and for special SIG research portfolios.

*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. Fees and costs related to SIG's services are described in Items 5 and 6 of SIG's Brochure and in Items 4 and 5 of the Wrap Fee Brochure.*

### **WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISOR? HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTERESTS DO YOU HAVE?**

When we act as your investment advisor, we have to act in your best interests and not put our interests 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:

**ADVISOR FEES:** Our primary income is from our asset-based investment advisory fee. We make more money when the account grows, when you make deposits or when you combine other accounts with us. We may therefore have an incentive to encourage you to increase the assets in your account. As a registered investment advisor, and as a fiduciary to our clients, SIG has a duty of loyalty and a duty to always act in utmost good faith, place our clients' interests first and foremost and to make full and fair disclosure of all material facts pertaining to potential or actual conflicts of interest.

**SERVICES PROVIDED TO SIG BY THE CUSTODIAN OF YOUR ASSETS:** SIG recommends clients custody their accounts with TD Ameritrade Institutional ("TD"). Clients will separately contract with TD for custody and other account services. Certain services are provided to SIG by TD that we use to maintain custody of and service your account assets. The availability of these services benefits us because we do not have to produce or purchase them. The client asset threshold required to receive these services may give us an incentive to recommend you to custody with a Custodian. We believe, however, that our selection of this custodian is in your best interest. *For more information regarding how SIG addresses conflicts of interest, please see SIG's Brochure and the Wrap Fee Brochure.*

**HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?** The primary SIG client advisors are compensated from the quarterly asset-based advisory fee charged to your account and any consulting fees charged. Other staff are compensated by salary and a discretionary yearly bonus based on various inputs, including client service, overall Firm contribution and profitability of the Firm.

**DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?** Neither the Firm nor its financial professionals currently have legal or disciplinary history requiring us to provide disclosure in this section. Disclosure information regarding investment advisors is available at: <https://adviserinfo.sec.gov/IAPD/IAPDSearch.aspx>

### **ADDITIONAL INFORMATION**

Additional information regarding SIG and its services is available in our Part 2A Brochure and Wrap Fee Brochure at <https://adviserinfo.sec.gov/firm/summary/297499> You can also call Brian McGregor at 202-580-6400 for a copy of this Customer Relationship Summary (or to discuss any concerns) or look on our website [www.sargentinvestmentgroup.com](http://www.sargentinvestmentgroup.com).

### 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?*

### CONVERSATION STARTERS

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

### CONVERSATION STARTERS

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*
- *Who is the primary contact person? Is he or she a representative of SIG?*
- *Who do I contact if I have concerns about how this person is treating me?*