

**Item 1 – Introduction**

Sage Mountain Advisors is an SEC-registered investment adviser that provides advisory services. Brokerage and investment advisory services and 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 investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2 – Relationship Services***What investment services and advice can you provide me?***

We offer investment advisory services to retail investors. As part of these services, we provide financial planning and investment consulting. Our portfolio managers review with each client their investment goals, objectives, and account performance on a periodic basis or at least annually. We may conduct account reviews other than on a periodic basis upon the occurrence of a triggering event, such as a client meeting, economic news, national or world events, or other similar factors. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. We provide advisory services to you on a discretionary and/or non-discretionary basis. For clients who engage us on a discretionary basis, we have authority to determine, without obtaining client consent, the securities to be bought or sold and the amount of securities to be bought or sold in your account. This discretion is exercised consistent with the stated investment objectives as part of your Investment Advisory Agreement with us. Any stated investment objectives, guidelines, limitations or restrictions you impose on the accounts will be documented as part of the account opening process and/or indicated in our Agreement. Further, clients who engage us on a discretionary basis may, at any time, impose restrictions, in writing, on our discretionary authority. For certain accounts, we provide services on a non-discretionary basis which means that we must receive your approval prior to executing any trades in your account(s). We do not currently limit our advice to proprietary products, or a limited menu of products or types of investments. We generally require a minimum monetary annual fee or asset value for investment advisory services. However, account relationships who do not meet our asset minimum but still wish to engage our services may do so by agreeing to a minimum annual fee of \$100,000, billed quarterly and in arrears. For additional information, see Item 4 – and 7 of our ADV Part 2A which can be accessed here: [Sage ADV 2A](#)

Key questions to ask:

- 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?

Item 3 – Fees, Costs, Conflicts, and Standard of Conduct***What fees will I pay?***

We charge an asset-based management fee for our advisory services. In addition, we offer standalone financial planning services for a fixed fee. Generally, our annual management fee varies between 1.00% and 0.15%. SMA bills management fees quarterly in arrears, which are deducted from your account. SMA may negotiate a base fee higher than the minimum fee due to the complexity of certain relationships. The advisory fee does not include fees related to brokerage commissions, transaction fees, and other related account costs and various expenses. SMA's advisory fees are asset-based. Therefore, the more assets there are in your advisory account, the more you will pay in fees; thus, the firm may have an incentive to encourage you to increase the assets in your account. Other fees and costs are also deducted from your account and will appear on your quarterly statement that you receive from your broker and/or custodian bank. Fees and costs will reduce any amount of money you make on your investments over time. 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 see Item 5- Fees and Compensation in Form ADV Part 2A accessible at the following link. [Sage ADV 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?

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? How much will be invested for me?

How do your financial professionals make money?

SMA employees are compensated through management fees paid by advisory clients, including institutional clients. SMA does not receive “soft dollar” benefits through arrangements entered into with third parties. “Soft dollars” refers to the practice of using broker commission dollars to pay for trading and research related goods or services and trade execution. However, SMA may receive from custodians without cost support services and/or products, certain of which assist SMA to better monitor and service client accounts maintained at such institutions. When broker commissions relating to client transactions are used to obtain research or other products or services, SMA receives a benefit for which it does not have to pay. Thus, SMA has an incentive to select a broker-dealer based on SMA’s interest in receiving the research or other products or services, rather than on the clients’ interest in receiving the lower commission. A detailed list of these programs is included in SMA’s ADV Part 2A accessible here: [Sage ADV 2A](#)

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. As part of our arrangement with large broker-dealers, they provide our investment professionals access to products and services that assist us in managing and administering your account(s). This includes research, brokerage services, conferences, educational meetings, and software and other technology. Thus, a conflict may exist as we have an incentive to select a broker-dealer based on our interest in receiving the research or other products or services, rather than on the clients’ interest in receiving lower fees and commissions through another broker-dealer. We review our relationship with broker-dealers and the associated costs to you as part of our obligation to act in your best interest.

Item 4 – Disciplinary History

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

No. A free and simple search tool to research us and our financial professionals is available at investor.gov/CRS.

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

Item 5 – Additional Information

Additional information about our investment advisory services and an up-to-date copy of the relationship summary is available by contacting us at (404) 795-8361 or Whitney Imeraj, Chief Compliance Officer, at wimeraj@sage-mtn.com.

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?