



Wrap Fee Program Brochure

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SGIM Inc.

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This wrap fee program brochure (this “Brochure”) provides information about the qualifications and business practices of SGIM Inc. (“SGIM”). If you have any questions about the contents of this Brochure, please contact us (855) 951-1800 and/or info@sgim.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority. SGIM is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information with which you determine to hire or retain an adviser. Additional information about SGIM also is available on the SEC’s website at www.advisorinfo.sec.gov. SGIM may be searched by name or using our CRD #291173.

ITEM 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the last amendment to SGIM's Form ADV Part 2 brochure on May 6, 2019, we note the following material changes to this Brochure:

- The Brochure has been updated to a Wrap Fee Program Brochure to reflect that SGIM's service is considered to be a wrap fee program.
- The Brochure has been updated to reflect the change in fee structure.
- The Brochure has been updated to reflect the affiliation with SGIM Alpha LP.
- The brochure has been updated to reflect the changes in investment options.

Generally, SGIM will notify clients of material changes on an annual basis in SGIM's annual Brochure update. However, where we determine that an interim notification is either meaningful or required, we will notify our clients promptly. In either case, we will notify our clients in a separate document.

ITEM 3 Table of Contents

ITEM 2	Material Changes	2
ITEM 4	Services, Fees and Compensation	4
ITEM 5	Account Requirements and Types of Clients.....	7
ITEM 6	Portfolio Manager Selection and Evaluation.....	7
ITEM 7	Client Information Provided to Portfolio Manager.....	13
ITEM 8	Client Contact with Portfolio Managers	13
ITEM 9	Additional Information.....	13

ITEM 4 Services, Fees and Compensation

Firm Overview

SGIM Inc. was incorporated in Delaware in October of 2017. The principal shareholders are Adam Forbes and Mitchell Wonboy.

Wrap Fee Program

SGIM is a financial technology investment manager that utilizes an algorithmic portfolio allocation, construction and investment process, eliminating human biases and focusing entirely on empirical data.

The core mission of SGIM is to offer our clients a superior customer experience by simply putting our client's interest above our own.

SGIM only invests on behalf of their clients in public equities and exchange-traded funds. The asset allocation process begins with prospective clients answering several questions in order to determine the appropriate mix of stocks and bonds that should exist within their investment portfolios. Next, SGIM recommends an asset allocation plan and once agreed to; we proceed in building and managing the client's portfolio.

SGIM does not take possession or maintain custody of client securities or funds. SGIM uses a centralized, automated portfolio management system to execute and maintain its client portfolios. Client portfolio trading is performed through a third-party custodian. SGIM clients' assets are housed at Apex Clearing Corporation, a FINRA registered broker-dealer ("Custodian" and "Apex") and member of the Securities Investor Protection Corporation ("SIPC"). SGIM requires clients to engage Apex as the broker-dealer/custodian. This requirement is based on the custodian's stability, reputation, ability to provide professional services, competitive commission rates, prices, and trading platform, compatibility with SGIM's website and other services which will help SGIM in providing investment management services to clients. However, because we act as the General Partner to the SGIM Alpha Fund, giving us and/or our supervised persons legal

ownership of or access to client funds or securities of that limit partnership. Pursuant to the regulations, we must direct a qualified custodian to send the account statements required under SEC's custody rule, to each limited partner invested in the SGIM Alpha Fund. Interactive Brokers LLC. serves as the qualified custodian for the Fund and its underlying capital accounts and will provide such account statements.

SGIM generally has limited power of attorney to act on a fully discretionary basis on the client's behalf. SGIM may choose the amount and type of securities to be bought and sold to fulfill investment objectives. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. Discretionary authority is executed by agreement through the investment advisory contract.

When such limited powers exist between SGIM and a client, SGIM may choose both the amount and type of securities to be bought and sold to satisfy account objectives.

Fee Schedule

SGIM is compensated for advisory services by charging an annual fee on a monthly basis in the arrears. No other fees are charged to the client. SGIM pays for all trading costs and custodial fees.

SGIM directly debits its management fee from client accounts on the first business day after the end of SGIM's fiscal month. SGIM has policies and procedures in place to ensure fees are calculated correctly and in accordance with clients agreed upon rates.

The following is our fee schedule:

Account Size	Annual Management Fee
\$1 million or less	0.70%
\$1 million to \$5 million	0.65%
\$5 million to \$10 million	0.60%
\$10 million and above	0.50%

Our asset management fees are annual fees, paid monthly in arrears, and may be negotiable. Payments are due on the first day of the calendar month and are based on the account's daily, end of the day, asset value from the prior calendar month multiplied by the applicable annual rate and divided by three hundred sixty-five (365) calendar days. The monthly fee is an aggregate of the prior months daily calculation. The end of the day account asset valuation is provided by the custodian. The fee for the prior month is billed and payable within ten (10) days after the end of the prior month. We will deduct our asset management fee only when in receipt of your written authorization by executing an investment advisory agreement permitting the fees to be paid directly from your account. The qualified custodian will deliver an account statement to you at least monthly, which will show all disbursements from your account.

Wrap fee programs may cost clients more or less than purchasing such services separately. A wrap fee program allows clients to pay a specified fee for investment advisory services and the execution of transactions. Fees are combined with the costs for executing transactions in clients' account(s). This may result in a higher advisory fee. SGIM does not charge clients higher advisory fees based on their trading activity. By participating in a wrap fee program, clients may end up paying more or less than through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to the client by the executing broker.

You may pay custodial fees, charges imposed directly by a exchange-traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm.

ITEM 5 Account Requirements and Types of Clients

We provide our investment advisory services to:

- Individuals
- High Net Worth Individuals
- Other business entities

Our minimum account size is \$10,000.00, however; this is negotiable on a case by case basis.

ITEM 6 Portfolio Manager Selection and Evaluation

SGIM, through its automated interactive web-based platform, is the sponsor and sole portfolio manager for the services described in this brochure. SGIM's owners oversee and are responsible for the services and advice offered by SGIM through its website.

Advisory Business

We provide asset management services in which we manage your custodial accounts.

Client Tailoring

As stated above, the SGIM asset allocation process begins with prospective clients answering several questions in order to determine the appropriate mix of stocks and bond that should exist within their investment portfolios. When creating client portfolios, SGIM recommends one of three allocation structures: 1. 100% equity, 2. 70% equity/30% bonds, or 3. 30% equity/70% bonds. If a client is unhappy with the SGIM recommendation, he or she has the option to override the SGIM recommendation and choose which of the three structures best suits his or her needs. The bond allocation is accomplished through ETF's while the equity allocation is made up of individual securities. Please note that changes in asset allocation could result in both increased risk and volatility within client portfolios.

Once the appropriate asset allocation is agreed upon the SGIM clients is then directed to choose which equity allocation best meets their needs from the following three portfolios: 1. The United States only portfolio, 2. Global portfolio, and 3. Socially Responsible portfolio. SGIM has built into its algorithm a bear market strategy. The intention of this strategy is for our client portfolios to capture less equity market downside during periods of prolonged, meaningfully increased equity market volatility. During periods of time when certain proprietary conditions are met SGIM will automatically reduce our client portfolios equity exposure by approximately 50%, which is moved into a fixed income exchanged traded funds, the Vanguard Total Bond Market ETF (BND). For the clients that select the Socially Responsible Portfolio the bear market strategy will implement the same market triggers but invest in iShares 7 – 10-year Treasury Bond ETF (IEF), instead of the Vanguard Bond Market ETF (BND) to adhere to the restrictions of the Socially Responsible Portfolio. Once the proprietary conditions that triggered the bear market strategy reverse themselves, the portion that was purchased in the fixed income ETF is sold and reallocated to equities. Please note that it is possible when the bear market strategy is triggered that a 100% equity portfolio could own approximately 50% equities and 50% of the stated bond ETF.

On a case by case basis, our clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs; however, if the restrictions prevent us from properly servicing the client's account, or if the restrictions would require us to deviate from our standard suite of services provided on our platform, we reserve the right to end the relationship.

Participation in Wrap fee Program

Our wrap fee and non-wrap fee accounts are managed on an according to the client's investment objectives, financial goals, risk tolerance, etc. Generally, we do not manage wrap fee accounts in a different fashion than non-wrap fee accounts; however, certain client accounts may be managed differently based on the size and nature of the account and/or the client's investment objectives and risk tolerance.

In our wrap fee program, your fee is bundled with our costs for executing transactions in your account(s). This may result in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

Performance-Based Fees and Side-By-Side Management

As disclosed in the Form ADV Part 2A Firm Brochure, SGIM only accepts performance-based fees for the pooled investment vehicle SGIM Alpha Fund LP. All other accounts are charge fees equal to a set percentage of assets under management to clients.

In general, client accounts are managed, and fees charged, in a similar fashion in that all client accounts are managed using SGIM's proprietary technology; however, differences within SGIM's client portfolios may lead to the use of different investment practices for client accounts. As a result, the portfolio management decisions relating to these accounts and the performance resulting from such decisions may differ from account to account. SGIM has implemented policies and procedures to address trade allocation and aggregation decisions to seek fair and equitable treatment of all clients over time.

SGIM does manage a pooled investment vehicle (SGIM Alpha, LP.) outside of the Wrap Fee program that does charge a performance fee. Please see Form ADV Part 2A. SGIM has procedures in place to properly supervise any trading issues between the Wrap Fee program and the pooled investment vehicle.

Methods of Analysis, Investment Strategies, and Risk of Loss

Asset Allocation Assessment

The SGIM asset allocation process begins with prospective clients answering several questions in order to determine the appropriate mix of stocks and bond that should exist within their investment portfolios. When creating client portfolios, SGIM recommends one of three allocation structures: 1. 100% equity, 2. 70% equity/30% bonds, or 3. 30% equity/70% bonds. If a client is unhappy with the SGIM recommendation, he or she has the option to override the SGIM recommendation and choose which of the three structures best suits his or her needs. The bond allocation is accomplished through ETF's while the equity allocation is made up of individual securities. Please note that changes in asset allocation could result in both increased risk and volatility within client portfolios.

Security Selection

SGIM is built on the foundational idea that it is possible to outperform broad market indexes through employing an algorithmically-based investment approach in the security selection process for our equity portfolios. We recognize that this is an opposing view from many professionals in the investment management community. Nonetheless, we hope to accomplish this through the analysis of both fundamental and technical data points, incorporating copious amounts of figures, statistics, and information. We then significantly reduce the universe of data to a set of core conditions, which we ultimately use to develop our security selection.

The fixed income allocations in SGIM's portfolios are typically passive and managed through a broadly diversified ETF. SGIM views fixed income as a volatility dampener, and therefore we focus on generating outperformance through an active equity allocation. Client trades are placed at 2:00 PM (EST) if the client account warrants a trade and has available liquidity.

Investment Strategies

Once the appropriate asset allocation is agreed upon the SGIM clients is then directed to choose which equity allocation best meets their needs from the following three portfolios: 1. The United States only portfolio, 2. Global portfolio, and 3. Socially Responsible portfolio.

SGIM has built into its algorithm a bear market strategy. The intention of this strategy is for our client portfolios to capture less equity market downside during periods of prolonged, meaningfully increased equity market volatility. During periods of time when certain proprietary conditions are met SGIM will automatically reduce our client portfolios equity exposure by approximately 50%, which is moved into a fixed income exchanged traded funds, the Vanguard Total Bond Market ETF (BND). For the clients that select the Socially Responsible Portfolio the bear market strategy will implement the same market triggers but invest in iShares 7 – 10-year Treasury Bond ETF (IEF), instead of the Vanguard Bond Market ETF (BND) to adhere to the restrictions of the Socially Responsible Portfolio. Once the proprietary conditions that triggered the bear market strategy reverse themselves, the portion that was purchased in the fixed income ETF is sold and reallocated to equities. Please note that it is possible when the bear market strategy is triggered that a 100% equity portfolio could own approximately 50% equities and 50% of the stated bond ETF.

Risk of Loss

Investing involves different levels of risk that can result in loss of any profits and/or principal you have not realized. We manage your account in a manner consistent with your pre-determined risk tolerance and suitability profile. However, we cannot guarantee that our efforts will be successful. Investing in securities involves the risk of loss clients should be prepared to bear.

Investing involves the assumption of risk, including:

Algorithm Risk: SGIM utilizes proprietary algorithms to manage the active portion of clients portfolios. Its algorithms do not consider any inputs other than what is generated by the author of the algorithms. No third parties are involved in the construction or amendments of the algorithms. Algorithms are, however, subject to human error. While SGIM strives to avoid this error, it is impossible to eliminate it entirely.

Loss of Crucial Personnel Risk: which is in the event that the loss of one or more officers of the Adviser may affect business operations. If for example, the Chief Investment Officer was unexpectedly not available, the investment algorithms may be affected.

Financial Risk: which is the risk that the companies we recommend to you perform poorly, which affect the price of your investment.

Market Risk: which is the risk that the stock market will decline, decreasing the value of the securities we recommend to you with it.

Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.

Political and Governmental Risk: which is the risk that the value of your investment will be affected by the introduction of new laws or regulations.

Interest Rate Risk: which is the risk that the value of the investments we recommend to you will fall if interest rates rise.

Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.

Voting Client Securities

SGIM will vote by proxy or otherwise on all matters for which a shareholder vote is solicited by, or concerning, issuers of securities beneficially held in client's accounts in such a manner as SGIM deems appropriate. SGIM does reserve the right to abstain from voting. SGIM clients delegate to SGIM the authority to receive and vote all proxies and related materials for any security held in SGIM accounts. SGIM will do so in a way that is reasonably expected to ensure that proxy matters are conducted in the best interest of clients.

ITEM 7 Client Information Provided to Portfolio Manager

SGIM, through its automated interactive web-based platform, is the sole portfolio manager. As such, SGIM does not share client information with any other portfolio manager. In establishing an account through SGIM's website, clients provide identifying information including age, email address, physical address, etc. as well as information related to risk tolerance and time horizon.

ITEM 8 Methods of Analysis, Investment Strategies, and Risk of Loss

SGIM's advisory service is provided through an automated interactive web-based platform. For technical questions and service issues, clients may contact SGIM's customer support via email at info@sgim.com at 855-951-1800. SGIM's advice is solely offered through its website. SGIM's personnel do not offer investment advice via email or telephone.

ITEM 9 Additional Information

Disciplinary Information

SGIM is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of SGIM or the integrity of SGIM's management. No such events have occurred at SGIM.

Other Financial Industry Affiliations and Affiliations

Neither SGIM nor any of its management personnel is registered or has an application pending to register, as a broker-dealer or broker-dealer representative, futures commission merchant, commodity pool operator, commodity trading adviser, or associated person of the foregoing. SGIM does not anticipate any such affiliations in the future. Adam Forbes is affiliated with Forbes Capital Management, LLC, which is no longer active.

Adam Forbes is the Chief Investment Officer of SGIM. In October 2015, Mr. Forbes established a pooled investment vehicle named Lume ALPHA, LP, a Delaware limited partnership ("Lume ALPHA"). In January 2018, Lume ALPHA was absorbed by SGIM and subsequently named SGIM ALPHA, LP. SGIM ALPHA currently has few investors, of which Mr. Forbes is one, but may add other investors in the future.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

SGIM has a written Code of Ethics that covers the following areas: confidentiality, insider trading, gifts and entertainment, personal trading policies, prohibited activities, compliance procedures, reporting violations, training, among other things. Failure to abide by the Code of Ethics could result in disgorgement of profits or gains and/or disciplinary action, including censure, suspension, or dismissal, against the individual by SGIM. The Code of Ethics is available upon request to any client or prospective client.

SGIM maintains a culture of ethics and integrity with the highest possible emphasis on clear and transparent communication and takes pride in its fiduciary duty to put its client's interest above its own under all circumstances. SGIM does not recommend the purchase or sale of any security in which SGIM or its affiliates have any material financial interest. SGIM may, however, from time to time, buy or sell securities for itself that it also recommends to clients. Such transactions may create a conflict of interest. SGIM will always disclose any transactions that could be construed as a conflict of interest and will always conduct any such transaction only after the client's transaction has been effected.

In an attempt to mitigate the anticipated conflicts of interest, SGIM requires that its employees act in accordance with all applicable federal and state regulation governing investment advisory practices, which includes, among other things, the policies and procedures regarding conflicts of interest and personal trading procedures.

Review of Accounts

Account information, including quantities and values of securities held, the amount of cash and cash equivalents and account transaction activity for each client is maintained on SGIM's computer system as well as with our client's custodian. This information is reconciled electronically against statements or electronic files from our custodial agent on a daily basis. All of this information can be accessed by our clients through logging onto SGIM.com under the client portal without restriction.

Additional account reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Clients will receive written monthly accounting reports showing asset value by security, unit cost, total cost, cash balances, and current per share values, portfolio benchmark quarterly return, benchmark inception return, client's quarterly return and client's benchmark return. Additionally, SGIM intends to show additional return data aligned with the longevity of the accounts.

Client Referrals and Other Compensation

SGIM does not receive any economic benefit for referrals from any source.

In the course of its business, SGIM may enter into written third-party agreements with members of the financial services community (the "Solicitors") pursuant to which such Solicitors will solicit Clients on behalf of SGIM. Any fees paid to a Solicitor shall be a referral fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act, and any corresponding state securities law requirements. If a Solicitor introduces a Client to SGIM, that Solicitor will disclose the nature of the Solicitor relationship with SGIM at the time of the solicitation. In addition, the Solicitor will provide each prospective Client with a copy of this Disclosure Brochure, and a copy of a written disclosure statement from the Solicitor to the Client, disclosing the terms and conditions of the arrangement between the Solicitor and SGIM, including the compensation the Solicitor will receive from SGIM. This compensation shall in no way affect the fee schedule applicable to Clients outlined in Item 5 of this Brochure.

Financial Information

SGIM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

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