

Sabrient Systems, LLC (“we,” “our,” or “us”) is registered with the Securities and Exchange Commission as an investment adviser. 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](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors such as you through a web-based subscription application that allows you to run stock searches and analysis, and generate stock portfolios, based on parameters that you select through our website (“Internet Services”). We have no access to your portfolio or account, and we consequently do not supervise or monitor your account or provide any individualized portfolio reports. You are solely responsible for determining whether and when to purchase or sell any stock recommended by Internet Services. There is no minimum requirement for subscribing to Internet Services.

Additional Information: Please also see Items 4, 7 and 13 of Form ADV, Part 2A.

In order to maintain our registration as an internet adviser, we do not answer questions directly posed by Internet Services subscribers. Here and below are some questions you may have – And answers that we would give:

- **Given my financial situation, should I choose an investment advisory service? Why or why not?**
 - Because Internet Services does not take into account your personal financial situation, we cannot answer this important question for you. You should seek advice from a financial professional.
- **How will you choose investments to recommend to me?**
 - Internet Services uses our proprietary computer software-based models to generate recommendations.
- **What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?**
 - We have experienced financial professionals and research analysts who, in addition to monitoring and updating the Internet Services application, provide investment advisory services to large financial institutions.

What fees will I pay?

The subscription fee for Internet Services is \$15 per month, payable in advance. Our fee does not include (and you will pay separately for) any applicable charges imposed by custodians, brokers and other third parties for things such as brokerage commissions, transaction fees, custodial fees, wire transfer and electronic fund fees, and other fees and taxes on your account and on any securities transactions you choose to make in your account.

Additional Information: If you choose to open an investment account with a third party, you will pay third party 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.

Here are some questions you may have – And answers that we would give:

- **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?**
 - The \$15 monthly subscription fee for Internet Services is entirely for access to our services. Our fee is not directly associated with any investment account you might have and will not be reflected in any such account statements. Any gains or losses in any investments you choose to make should otherwise be fully reflected in your account, subject to any applicable third-party charges as described above.

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. As an example, we are entitled to retain your Internet Services subscription fee even if investments that you choose to make, based on the Internet Services recommendations, lose money.

Additional Information: Please also see Items 10-12, 14 of Form ADV, Part 2A.

Here are some questions you may have – And answers that we would give:

- **How might your conflicts of interest affect me, and how will you address them?**
 - We publish periodic blog posts and a free email market letter with commentary. We have adopted policies to give all of our clients priority over recipients of such posts and letters.

How do your financial professionals make money?

Our financial professionals earn a salary and, when applicable, merit bonuses for performing advisory functions.

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

No, we do not. You may visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Additional Information

You can find additional information about us and our advisory services at www.sabrientsystems.com. If you would like up-to-date information and/or a copy of this relationship summary, please call (805) 730-7777.