



Sage Rutty & Co., Inc.

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**FORM ADV PART 2
BROCHURE**

This brochure provides information about the qualifications and business practices of Sage Rutty & Co., Inc. If you have any questions about the contents of this brochure, please contact us at (585) 232-3760. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Sage Rutty & Co., Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Sage Rutty & Co., Inc. is 3254. Sage Rutty & Co., Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

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SUMMARY OF MATERIAL CHANGES

The purpose of this section is to outline material changes since the last annual update of the Sage, Rutty & Co., Inc. Investment Advisor Brochure. The date of the last annual update was March 30, 2022.

We have no material changes to report since our last annual update.



ADVISORY BUSINESS

Our Company & Principals

Sage Rutty & Co. Inc. (SRC) is a federally registered investment advisor with the Securities and Exchange Commission (SEC). Since 1937 Sage Rutty & Co., Inc. has also been registered with the Securities and Exchange Commission as a broker/dealer offering investment advice. For more than 100 years, Sage Rutty & Co., Inc. has helped families invest and manage their financial assets, allowing them to create and preserve wealth for generations. The President of Sage Rutty is Mr. Trevor Holly.

Types of Services we offer:

Sage Rutty provides advisory services through various platforms.

- 1. Wrap Fee Programs** - Sage Rutty has a wrap fee program we utilize at the following custodians: First Clearing, LLC¹, SEI Investment Management Corp., and Schwab Advisor Services, a division of Charles Schwab & Co., Inc ("Schwab").
- 2. Financial Planning Department advisory platform** - Salaried members of Sage Rutty's financial planning department work with advisory representatives to develop a written financial strategy for clients based on their particular financial situation, investment objectives and needs.
- 3. QRP** - Under the QRP (formerly SIP) advisory service platform, SRC advisory representatives gather information from qualified plan participant clients to develop investment strategies and recommendations for plan participants based on their particular financial situation, investment objectives and needs. Implementation of investment recommendations made by SRC advisory representatives may be either at the discretion of the Advisor or the plan participant client depending on the nature of the relationship. All changes will be executed through the qualified plan program.

CUSTOMIZATION OF ACCOUNTS & RESTRICTIONS ON INVESTMENTS

All advisory services are specific to the individual client's needs. After an initial meeting to discuss in detail the client's overall financial picture, this discussion may include, but is not limited to all relevant financial background and future goals, family dynamics and retirement and estate needs. A recommendation is then presented by the advisor representative for input from each client. All clients are expected to be very involved in this process allowing the client and advisor to reach the best plan available that meets the client's individual needs. If needed, and as mutually agreed to by us, the client may restrict certain types of investments in their account.

FINANCIAL PLANNING

Under the Financial Planning Department advisory service platform, salaried members of Sage Rutty's financial planning department work with your Financial Advisor to develop a written financial strategy based on your particular financial situation, investment objectives, and risk tolerance. Several levels of planning services are available to provide you with a detailed plan addressing your individual planning questions. However, implementation of plan recommendations is at the full discretion of the client.

Once a client has expressed an interest in contracting for a financial plan, relevant preliminary data is gathered. Based on this information, the client's objectives, and the areas to be covered in the plan, a fee (if any) is calculated. If the fee is agreeable to the client, more detailed information about the client is collected in a confidential questionnaire. A financial planning agreement, outlining the work to be done, is prepared for the client's signature. Supporting documents such as recent personal and business tax returns, wills and trusts financial statements, etc., are requested from the client. Work is begun upon Sage Rutty's receipt of the completed questionnaire, signed financial planning agreement, and a check made payable to Sage Rutty & Co. for not less than 50% of the stated fee. The balance of the fee is due upon presentation of the completed plan.

¹First Clearing is a trade name used by Wells Fargo Clearing Services, LLC, Member SIPC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.

If the client decides not to proceed with the preparation of the plan within five (5) business days from the date of the agreement, Sage Rutty will return the client's retainer fee and all supporting documents.

Sage Rutty's Financial Planning Department offers several financial planning modules to its clients. These levels are differentiated according to the scope of study and analysis contained therein and is intended to effectively address client situations of varying degrees of complexity.

- **FOUNDATION** module focuses on providing strategies and recommendations in the areas of budget and cash management, five-year projections of cash flow, income taxes and net worth, asset allocation and education analysis.
- **RETIREMENT** module includes the foundation module analysis and focuses on providing strategies relating to long-term projections of cash flow, income taxes and net worth.
- **SOCIAL SECURITY** module provides a step by step Social Security benefit claim strategy to our clients that will help them maximize their benefits under three different scenarios.
- **RISK MANAGEMENT** module includes the foundation module analysis and focuses on providing strategies and recommendations in the areas of life insurance, disability insurance, and long-term care insurance.
- **ESTATE PLANNING** module includes the foundation module analysis and focuses on providing strategies and recommendations in the areas of current estate distributions.
- **COMPREHENSIVE FINANCIAL PLAN** module focuses on providing strategies and recommendations in all of the areas contained in each of the four modules described above.

The plan, when presented to the client, will make generic recommendations of appropriate strategies and investments. Implementation of any recommendation is at the sole discretion, and responsibility, of the client. If the client is interested in purchasing investments, specific investment products will be recommended by the advisory Representative in his/her capacity as a registered representative or insurance agent.

In addition to our Financial Planning Department, individual Advisors at Sage, Rutty may also provide fee-based planning services and / or consulting services to their clients. A financial plan is designed to help the client with all aspects of financial planning with or without ongoing investment management after the financial plan is completed. The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Financial planning is a discovery process whereas situations may occur where the client is unaware of certain financial exposures or predicaments. Detailed investment advice and specific recommendations are provided as part of a financial plan; however, implementation of the recommendations is at the discretion of the client. Financial planning can range in complexity, and as a result, planning fees are negotiable on a case-by-case basis.

Fees for Planning Services

The fee for a financial plan is dependent on the scope of the plan. Sage Rutty has several fee structures for the services set forth above. The specific fee structure utilized in any given situation shall be fully discussed with the client and disclosed in the Financial Planning Agreement, which the client signs with Sage Rutty prior to the commencement of any services. Some of the possible fee structures are:

- **Financial Planning Modular/Comprehensive Fees:** as a fixed fee, a software-generated modular or comprehensive plan are available typically ranging from \$250-\$10,000, depending on the specific service requested and the nature and complexity of each client's circumstances.
- **Hourly Fees:** individual Advisors at Sage Rutty may charge an hourly fee typically ranging from \$250-\$500 per hour for services which may vary depending upon the needs of the client and the complexity of the plan/consulting. The exact hourly rate, as well as the work to be performed, will be specifically disclosed in the Financial Planning Agreement, and agreed to by the client.

For financial planning engagements, a portion of the planning fee may be due and payable at the time the investment advisory agreement is signed with the balance of the fee due as portions of the plan are completed and delivered to the client. In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

Sage Rutty clients will not be charged more than an initial fee of \$1,200 for any financial or estate plan that is expected to exceed 6 months for completion. The Financial Planning Agreement by and between Sage Rutty and the client may be canceled at any time by providing written notice to the other party of their desire to cancel the agreement. In either case, all checks should be paid to the firm and not your Advisor.

QRP (formerly SIP) Management

Sage Rutty Financial Advisors gather information from qualified retirement plan participant clients to develop investment strategies and recommendations for plan participants based on their particular financial situation, investment objectives and needs. Implementation of investment recommendations made by Sage Rutty Financial Advisors is at either the discretion of the participant client or their Financial Advisor, as determined by written agreement and is executed through the qualified retirement plan program.

Sage Rutty may utilize a third-party platform, Pontera (formerly FeeX), which is an Order Management System to facilitate management of held away assets such as defined contribution plan participant accounts held in qualified retirement plan programs. The platform allows the Financial Advisor to avoid being considered to have custody of Client funds since Sage Rutty does not have direct access to Client log-in credentials to affect trades. In order to engage in the use of the platform, both the Client and Financial Advisor will need to execute the Pontera agreement. As part of this agreement, the advisory fee will be disclosed to Client, with a maximum rate of 1.00%. Sage Rutty is not affiliated with the platform in any way. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, the Financial Advisor will review the current account allocations. When deemed necessary, the Financial Advisor will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. The Financial Advisor will regularly review the available investment options in these accounts, monitor them, and rebalance and implement strategies in the same way they do in other accounts, as deemed necessary.

Wrap Fee Programs

Sage Rutty has a wrap fee program we utilize at the following custodians: First Clearing, LLC¹, SEI Investment Management Corp., and Schwab Advisor Services, a division of Charles Schwab & Co., Inc ("Schwab"). After an evaluation of your individual situation and objectives, your Financial Advisor will work with you to select the program that best suits your needs.

When you participate in a wrap program, your net fees generally include management fees, performance reporting, transaction fees, and may also include custody fees. Non-wrap programs charge these fees separately, and the net cost of these programs could be higher or lower than the cost of the combined services under a wrap program. Sage Rutty & Co., Inc. and your Financial Advisor will share in a portion of the management fees that are charged to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we may be charged for executed trades.

Asset Advisor

The Asset Advisor program is designed for investors seeking the investment knowledge, experience and guidance of a financial advisor, and the flexibility to hold multiple products, including stocks, bonds and select mutual funds in a single account. An annual fee (billed quarterly) covers the cost of advice and transactions and includes periodic performance reports to track portfolio progress.

Advisory products are not designed for excessively traded or inactive accounts and are not suitable for all clients. You should carefully review the Advisory Disclosure Document associated with the program for a full description of services, including fees and expenses and those fees or expenses that may be excluded. The minimum account size for this program is \$25,000.

CustomChoice

The CustomChoice program is designed for investors seeking a diversified investment program that includes the investment knowledge and objective advice of a financial advisor who can provide guidance in constructing a customized portfolio of mutual funds. The program's broad universe of mutual funds includes many that are only available to institutional investors.

Advisory products are not designed for excessively traded or inactive accounts and are not suitable for all clients. You should carefully review the Advisory Disclosure Document associated with the program for a full description of services, including fees and expenses and those fees or expenses that may be excluded. The minimum account size for this program is \$25,000.

FundSource®

The *FundSource* program is designed for investors who want a diversified portfolio of mutual funds that fits their personal investment goals. It provides a framework for establishing an investment strategy that takes into account your financial goals, risk tolerance and willingness to make adjustments as your life changes. Then, working with your financial advisor, you develop a plan tailored to your needs.

The *FundSource* program offers professionally managed portfolios of mutual funds tied to specific investment objectives. A key element of the program is an advice process to help you choose the predefined portfolio – or create a customized portfolio using recommended funds – that best fits your investment goals and tolerance for risk.

The investment return and principal return of a mutual fund will fluctuate so that an investor's shares, when redeemed, may be worth more or less than their original price.

The fees for advisory programs listed are asset based and assessed quarterly in advance. There may be a minimum fee to maintain this type of account. Fees include advisory services, performance measurement, transaction costs, custody services and trading. These fees do not cover the fees and expenses of any underlying exchange traded funds, closed-end funds or mutual funds in the portfolio.

Advisory accounts are not designed for excessively traded or inactive accounts and may not be suitable for all investors. Please carefully review the Advisory Disclosure Document associated with the program for a full description of our services, including fees and expenses. The minimum account size for these programs is \$25,000.

FundSource FoundationsSM

The FundSource Foundations program gives you access to professionally managed portfolios of mutual funds aligned for specific goals and investment objectives. The program offers active portfolio management, ongoing mutual fund analysis, automatic rebalancing and performance monitoring.

The FundSource Foundations program is designed for investors who want a diversified portfolio of mutual funds that fits their personal investment goals. It offers the expertise of professional investment managers in constructing and managing a portfolio based on Wells Fargo Investment Institute analysis and advice.

The investment return and principal return of a mutual fund will fluctuate so that an investor's shares, when redeemed, may be worth more or less than their original price.

The fees for advisory programs listed are asset based and assessed quarterly in advance. There may be a minimum fee to maintain this type of account. Fees include advisory services, performance measurement, transaction costs, custody services and trading. These fees do not cover the fees and expenses of any underlying exchange traded funds, closed-end funds or mutual funds in the portfolio. Advisory accounts are not designed for excessively traded or inactive accounts and may not be suitable for all investors. Please carefully review the Advisory Disclosure Document associated with the program for a full description of our services, including fees and expenses. The minimum account size for this program is \$10,000.

FundSource® Pathways® Blends

With the Pathways portfolios, you get access to blends of Russell mutual funds based on the analysis and advice of Russell Investments, which has been serving institutional clients for more than 40 years. Through the Pathways portfolios, you gain access to Russell's research, analysis and investment strategies, as well as ongoing review of your investment portfolio.

The Pathways portfolios are designed for investors who want a diversified investment program that includes an active approach to asset allocation, prefer professional portfolio managers who can make investment decisions on their behalf, and appreciate a program that includes portfolio monitoring, automatic rebalancing and quarterly reporting.

The investment return and principal return of a mutual fund will fluctuate so that an investor's shares, when redeemed, may be worth more or less than their original price.

The fees for advisory programs listed are asset based and assessed quarterly in advance. There may be a minimum fee to maintain this type of account. Fees include advisory services, performance measurement, transaction costs, custody services and trading. These fees do not cover the fees and expenses of any underlying exchange traded funds, closed-end funds or mutual funds in the portfolio. Advisory accounts are not designed for excessively traded or inactive accounts and may not be suitable for all investors. Please carefully review the Advisory Disclosure Document associated with the program for a full description of our services, including fees and expenses. The minimum account size for these programs is between \$10,000 and \$2,000,000.

Personalized Unified Managed Account – UMA

The Personalized Unified Managed Account (UMA), formerly known as the Diversified Managed Allocations (DMA) program, is designed for investors seeking the ability to customize a portfolio to their specific needs and goals, along with guidance from an experienced, professional money manager. UMA offers the combination of investment strategies from various investment managers, mutual funds and exchange-traded funds (ETFs) on a single wealth management platform. Masters, Wells Fargo COMPASS® and Allocation Advisors are all exclusively available under the Personalized UMA program.

Exchange Traded Funds are subject to risks similar to those of stocks. Investment returns may fluctuate and are subject to market volatility, so that an investor's shares, when redeemed or sold, may be worth more or less than their original cost. Exchange Traded Funds may yield investment results that, before expenses, generally correspond to the price and yield of a particular index. There is no assurance that the price and yield performance of the index can be fully matched.

The investment return and principal return of a mutual fund will fluctuate so that an investor's shares, when redeemed, may be worth more or less than their original price.

Advisory products are not designed for excessively traded or inactive accounts and are not suitable for all clients. You should carefully review the Advisory Disclosure Document associated with the program for a full description of services, including fees and expenses and those fees or expenses that may be excluded. The minimum account size for this program is \$50,000.

Allocation Advisors

Allocation Advisors is designed for investors seeking professionally managed portfolios composed primarily of exchange-traded funds (ETFs), with the goal of providing diversification while keeping underlying investment costs to a minimum.

Exchange Traded Funds are subject to risks similar to those of stocks. Investment returns may fluctuate and are subject to market volatility, so that an investor's shares, when redeemed or sold, may be worth more or less than their original cost. Exchange Traded funds may yield investment results that, before expenses, generally correspond to the price and yield of a particular index. There is no assurance that the price and yield performance of the index can be fully matched.

Advisory products are not designed for excessively traded or inactive accounts and may not be suitable for all investors. You should carefully review the Advisory Disclosure Document associated with the program for a full description of services, including fees and expenses and those fees or expenses that may be excluded. The minimum account size for this program is between \$10,000 and \$50,000 depending on the program or strategy selected.

Masters

The Masters program is designed for investors seeking personalized investment portfolios with access to the nation's top institutional investment managers. It offers a complete package of services including

guidance for selecting investment managers, flexibility in portfolio management, and ongoing monitoring and evaluation.

Advisory products are not designed for excessively traded or inactive accounts and are not suitable for all clients. You should carefully review the Advisory Disclosure Document associated with the program for a full description of services, including fees and expenses and those fees or expenses that may be excluded. The minimum account size for this program is \$100,000.

Wells Fargo COMPASS®

The Wells Fargo COMPASS® advisory program provides an asset allocation or style- specific portfolio to meet long-term investment objectives. It is designed for investors who prefer a portfolio manager who can make investment decisions on their behalf. The program offers objective advice, professional money management, the simplicity of one account, and quarterly performance reporting.

General Disclosure:

The fees for the Wells Fargo COMPASS® advisory program are asset based and assessed quarterly in advance. There is a minimum fee of \$250 per calendar quarter to maintain this type of account. Fees include advisory services, performance measurement, transaction costs, custody services and trading. These fees do not cover the fees and expenses of any underlying exchange traded funds, closed-end funds or mutual funds in the portfolio. Advisory accounts are not designed for excessively traded or inactive accounts and may not be suitable for all investors. Please carefully review the Advisory Disclosure Document for a full description of our services, including fees and expenses. The minimum account size for this program is between \$150,000 and \$250,000.

Private Advisor Network

Private Advisor Network is designed for investors seeking direct access to professional money managers and their investment services. It offers the flexibility of individual security ownership for tax and planning purposes, and the ability to customize an investment portfolio to specific needs and circumstances.

Advisory products are not designed for excessively traded or inactive accounts and are not suitable for all clients. You should carefully review the Advisory Disclosure Document associated with the program for a full description of services, including fees and expenses and those fees or expenses that may be excluded. The minimum account size for this program is \$100,000.

The Private Investment Management (PIM®) Program

Our brokerage firm offers the Private Investment Management (PIM®) program which is a customized portfolio management program geared toward your specific investment goals. As your portfolio manager, your financial advisor actively manages your portfolio on an ongoing, discretionary basis using his or her individual investment style.

The fees for advisory programs listed are asset based and assessed quarterly in advance. There may be a minimum fee to maintain this type of account. Fees include advisory services, performance measurement, transaction costs, custody services and trading. These fees do not cover the fees and

expenses of any underlying exchange traded funds, closed-end funds or mutual funds in the portfolio. Advisory accounts are not designed for excessively traded or inactive accounts and may not be suitable for all investors. Please carefully review the Advisory Disclosure Document associated with the program for a full description of our services, including fees and expenses. The minimum account size for these programs is \$50,000.

Client Assets Managed by Us

	U.S. Dollar Amount	Total Number of Accounts
Discretionary	\$ 752,509,455	1,981
Non-Discretionary	\$1,199,834,189	4,299
Total	\$1,952,343,644	6,280

As of 12/31/2022

FEES AND COMPENSATION

Financial Planning Department fees

Foundation	\$ 750.00
Retirement	\$1,500.00
Social Security	\$ 250.00
Risk Management	\$ 750.00
Estate Planning	\$ 750.00
Divorce Financial Analysis	Fixed Hourly Rate
Comprehensive Financial Plan	\$3,000.00

Fixed Hourly Rate \$ 250.00 - \$500.00

Compensation

All of the program accounts described in this brochure are charged a fee on eligible assets (i.e., the total value of securities, money market funds and cash) under management. To follow, you will find a list of the programs we offer, and the fees associated with each. Your fees will include investment management, which includes portfolio monitoring, reporting, clearance, and purchase and sales transaction costs. Fees will not include things such as transaction fees (e.g., wires and transfers) or other charges (e.g., FedEx). Commissions and other fees will be charged on assets held outside of yourwrap account (see "C" below.) Fees for accounts may be adjusted based on value or for multiple accounts.

FundSource® CustomChoice® Program Fees

Minimum Account Size \$25,000
(FundSource FoundationsSM \$10,000 minimum)

	Standard Fee
Fee Schedule	2.00%

ASSET ADVISOR PROGRAM FEES

Asset Advisor accounts are charged an all-inclusive fee that covers advisory, execution, custodial, and reporting services. Billed quarterly in advance, the standard Asset Advisor fee schedule is based on program eligible assets:

Minimum Account Size \$25,000

Account Asset Value	Standard Fee
First \$250,000	3.00%
Next \$750,000	2.50%
Over \$1,000,000	2.00%

COMPASS program fees

Minimum Account Size \$150,000

Fee Schedule	Standard Fee 2.25%
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Personalized Unified Managed Account “UMA” Program Fees

Minimum Account Size \$50,000 (Optimal Blends \$250,000)

Fee Schedule	Standard Fee 2.50%
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Masters Program Fees

Minimum Account Size \$100,000

Fee Schedule	Standard Fee 2.50%
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Allocation Advisors Program Fees

Minimum Account Size \$25,000 - \$50,000

Fee Schedule	Standard Fee 2.25%
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Pathways Program Fees

Minimum Account Size \$25,000

Fee Schedule	Standard Fee 2.00%
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Private Investment Management “PIM®” Program Fees

PIM accounts are charged an all-inclusive fee that covers advisory, execution, custodial and reporting services. Billed quarterly in advance, the standard PIM fee schedule is based on program eligible assets:

Minimum Account Size \$50,000

Account Asset Value	Annualized Fee
First \$250,000	3.00%
Next \$750,000	2.50%
Over \$1,000,000	negotiable

SEI INVESTMENT MANAGEMENT CORP. (SEI) PROGRAM FEES

SEI accounts are charged an all-inclusive fee on eligible assets that covers advisory, execution, custodial, and reporting services. Billed quarterly in arrears:

ACCOUNT ASSET VALUE	ANNUALIZED FEE
First \$999,999	2.00% - 1.00%
Over \$1,000,000	negotiable

Schwab PROGRAM FEES

Schwab accounts are charged a fee on eligible assets that covers advisory, execution, custodial, and reporting services. Advisory fee billing will be monthly calculated on the Average Daily Balance and may be charged either in advance or arrears.

You may pay custodial fees, charges imposed directly by a mutual fund, index fund, or 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, fees for trades executed away from custodian and other fees and taxes on accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm.

ACCOUNT ASSET VALUE	ANNUALIZED FEE
First \$999,999	2.00% - 1.00%
Over \$1,000,000	negotiable

Schwab has eliminated commissions for online trades of equities, ETFs and options (subject to \$0.65 per contract fee). This means that, in most cases, when we buy and sell these types of securities, we will not have to pay any commissions to Schwab. We encourage you to review Schwab's pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If you choose to enter into a wrap fee arrangement, your total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what you would pay for transactions in a non-wrap account please refer to Schwab's most recent pricing schedules available at schwab.com/aspricingguide.

QRP Program Fees

Account Value Fees	.05% - 1.00% of account value
Annual Minimum Fee	\$250 to \$1,000

You should be aware that program fees charged may be higher or lower than those otherwise available if you were to select a separate brokerage service and negotiate commissions in the absence of the extra advisory service provided. Our fee schedules may be subject to negotiation depending upon a range of factors including, but not limited to account sizes and overall range of services provided.

You should consider the value of these advisory services when making such comparisons. The combination of custodial, advisory and brokerage services may not be available separately or may require multiple accounts, documentation and fees. You should also consider the amount of anticipated trading activity when selecting among the programs and assessing the overall cost. Advisory programs typically assume a normal amount of trading activity and, therefore, under particular circumstances, prolonged periods of inactivity or asset allocations with significant fixed income or cash weightings may result in higher fees than if commissions were paid separately for each transaction.

A portion of the fees or commissions charged for the programs described here may be paid to Sage Ruty & Co., Inc. Financial Advisors in connection with the introduction of accounts as well as for providing client-related services within the programs. This compensation may be more or less than a Financial Advisor would receive if you paid separately for investment advice, brokerage, and other services, and may vary, depending on the program or services offered.

DEDUCTION OF OUR FEES

Unless agreed upon otherwise, you authorize us to deduct a quarterly fee (or monthly, in the case of Schwab) calculated at the rate indicated in the Fee Schedule for that program from your account, in advance (or arrears in the case of SEI or Schwab). For the purposes of calculating program fees, "total account value" shall mean the sum of the long and shortmarket value of all securities and mutual funds, if applicable. In valuing the account, we will use the closing prices or, if not available, the lowest published "bid-price" and if none exist, the last reported transaction if occurring within the last 45 days. For mutual funds, we use the fund's most current net asset value, as computed by the fund company. In so doing, we will use information provided by quotation services believed to be reliable.

The initial fee is calculated as of the date that the account is accepted into the program and covers the remainder of the calendar quarter. Subsequent fees will be determined for calendar quarter (or monthly) periods and shall be calculated on the value of the account on the last business day of the prior calendar quarter (or the average daily balance, in the case of accounts held with Schwab).

No fee adjustment will be made during any fee period for appreciation or depreciation in the value of the assets in your account during that period. Your account will be charged or refunded a prorated quarterly fee on any net additions or net withdrawals in the account during a month. Fees will be charged or refunded if the net addition or net withdrawal would generate a fee or refund of at least \$40 for that quarter. Fees will be assessed in the month following the net addition or net withdrawal. Fees are based on the value of the assets in your account, and Sage Ruty & Co., Inc. shall not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of your funds.

Whenever there are changes to the fee schedule, the schedule charges previously in effect shall continue until the next billing cycle.

OTHER FEES AND EXPENSES

The fee does not include certain dealer markups or markdowns, odd lot differentials, transfer taxes, exchange fees, execution fees (foreign and/or domestic) when applicable, and any other fees required by law. Cash balances in an account may be invested in money market mutual funds including, as permitted by law, those with which we have agreements to provide advisory, administrative, distribution, and other services and for which we receive compensation for the services rendered. In a low interest

rate environment, the yield that you earn on cash and cash alternatives, including cash sweep funds, CDs and money market funds may not offset advisory fees. In some instances, the effective yield of the investment may in fact be negative.

Non-brokerage-related fees, such as IRA fees, are not included in the wrap fee and may be charged to your account separately. As more fully described in the fee schedules above, the fees you are charged may be different, depending on the asset type invested by the account.

Your Financial Advisor may suggest that you use other products and services that Sage Rutty & Co., Inc. offers, but that are not available through the program you select ("Excluded Assets"). Excluded Assets are not charged a program fee and are not considered a part of the program or program services. We generally recommend that you hold these Excluded Assets in a separate brokerage account. If an excluded fund purchased for or transferred into your account later becomes eligible for the program, program fees will apply to that fund and it may become subject to the rebalance trading system. You will incur any usual and customary brokerage charges and fees imposed on transactions in Excluded Assets which may include (i) any dealer markups and odd lot differentials and transfer taxes; (ii) charges imposed by broker-dealers and custodians other than First Clearing, LLC¹ and its affiliates and fees for other products and services that we and our affiliates may offer; (iii) offering discounts, commissions and related fees in connection with underwritten public offerings of securities; (iv) margin interest and operational fees and charges; (v) IRA fees; and (vi) any redemption fees, exchange fees and or similar fees (among which SEC fees are included) imposed in connection with mutual fund transactions whereby Sage, Rutty or your Financial Advisor may receive additional compensation on these Excluded Assets.

In addition, the firm and an Advisor may act as a placement agent for a private placement that may be recommended to advisory clients for which the firm and this Advisor receive compensation. Such recommendations may only be made after determining the prospective advisory client is an "Accredited Investor" as defined under Rule 501 of Regulation D of the Securities Act of 1933. At a minimum, the items reviewed with the client for such a recommendation include; the underlying investments or physical properties, tax aspects, risks, and characteristics of the sponsor including financing and experience. This investment, if purchased, is held outside of an advisory account and considered an "Excluded Asset" As noted above, excluded assets are not also charged a program fee and are not considered part of a wrap program or program services.

PAYMENT OF FEES IN ADVANCE

Fees are charged in advance, arrears for SEI or Schwab. If for any reason you decide to terminate your account, we require a written five (5) day advance notice to terminate your account. Upon receipt of your written termination notice we will pro-rate the fees charged in your account for the actual days managed and refund any unearned fees to you. Some accounts may also be charged a small start-up fee.

OTHER COMPENSATION WE MAY RECEIVE

In addition to our receipt of advisory fees, we may receive additional compensation from the activity in your account in the form of marketing service fees for mutual funds (i.e., 12b-1 fees) purchased in your account. In the event your account is a qualified ERISA account, those fees will be credited to the Plan.

Our advisors may also receive compensation for transactions (brokerage fees/commissions) executed in your account IF those assets are held outside of one of the wrap accounts described above. We do not reduce our advisory fees in ratio to our other compensation received from commissions and/or markups or markdowns. You are not required to direct the transactions in your account to our affiliate; you may direct the transactions in your account through a broker/dealer of your choice.

¹First Clearing is a trade name used by Wells Fargo Clearing Services, LLC, Member SIPC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.

ACCOUNT TERMINATION

Your account agreements may be terminated by either party at any time upon notice. If you terminate your agreement, a pro rata refund will be made, less reasonable start-up costs. You have the right, within five (5) days of execution, to terminate the Client Agreement without penalty. In the event of cancellation of Client agreements, fees previously paid pursuant to the fee schedule will be refunded on a pro rata basis, as of the date notice of such cancellation is received by the non-canceling party, less reasonable start-up costs.

If you choose to terminate your agreement with any of our investment advisory programs, we can liquidate your account if you instruct us to do so. If so instructed, we will liquidate your account in an orderly and efficient manner. We do not charge for such redemption; however, you should be aware that certain mutual funds impose redemption fees as stated in their fund prospectus. You should also keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with your tax advisor.

We will not be responsible for market fluctuations in your account from the time of notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner. Factors that may affect the orderly and efficient liquidation of an account might be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable, and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate an advisory account, termination orders cannot be considered market orders. It may take several business days under normal market conditions to process your request.

ACKNOWLEDGMENT OF OUR FIDUCIARY STATUS WITH RESPECT TO RETIREMENT ACCOUNTS

The U.S. Department of Labor issued a rule pertaining to investment advice provided to retirement investors, called Improving Investment Advice for Workers & Retirees. The rule applies to retirement accounts governed by the Employee Retirement Income Security Act ("ERISA") and/or the

Internal Revenue Code ("Code"), including Individual Retirement Accounts ("IRA") and Education Savings Account ("ESA"). Pursuant to the rule, we are providing the following acknowledgment:

When we provide "investment advice," as defined under Title I of ERISA or the Code, to you regarding your retirement plan account, IRA, or ESA, we are fiduciaries within the meaning of ERISA and/or the Code. The way we make money creates some conflicts with your interests, so when we operate as a fiduciary for your retirement account(s) we operate under a special rule, PTE 2020-02, that requires us to act in your best interest and not put our interest ahead of yours. To the extent that particular communications to you or activities are considered "investment education" or otherwise non-fiduciary under ERISA, we are not a fiduciary in connection with such communications or activities.

The Department of Labor has published a guide titled Choosing the Right Person to Give You Investment Advice: Information for Investors in Retirement Plans and Individual Retirement Accounts, which can be found at <https://www.dol.gov/agencies/ebsa/about-ebsa/our-activities/resource-center/faqs/choosing-the-right-person-to-give-you-investment-advice>.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Sage Rutty & Co., Inc. does not manage accounts for a performance-based fee or share of capital gains.

TYPES OF CLIENTS

We manage assets for the following types of clients: individuals, pension and profit-sharing plans, trusts and estates, charitable organizations, and corporations. We do not have any special fees or requirements for our accounts in addition to the fee schedule or minimum size noted above.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

We may use various methods to assist us in managing your account, including long and short term trading, the use of margin and options.

We use several methods of analysis to help us manage your account. Charting will help us evaluate the movement (i.e. trend lines) of your positions in bull (up) and bear (down) markets, along with support levels and sector analysis, which are a part of the technical analysis of a particular stock. Although this assists us with evaluating market risk and profitability it is not a definitive predictor of a stock's value.

We may also use fundamental analysis, which is when we are looking at the financial and product strength of a company and considering its competitors. We may also include as part of this analysis the position a particular company has on a global economic scale. Both fundamental and technical analysis often includes these fundamental factors. Fundamental will focus on the long(er) term behavior of stocks, while technical will try to forecast shorter (less than 6 month) market trends.

Another method we use is cyclical analysis, which looks at the growth of a stock versus various events that might affect the price of stock at a given point in time. This evaluates the growth cycle (i.e. life cycle of a product or company) on a long, intermediate and short term.

If your objectives include frequent or short-term trading strategies it can affect your investment results, have tax consequences and add to your overall cost of managing your portfolio.

There is no one method or combination of methods of evaluating a stock that is fool proof. In spite of the best analysis and strategies, a stock can move in the wrong direction, resulting in a loss of your investment.

DISCIPLINARY INFORMATION

We are required to disclose any legal or disciplinary events that might be material to your evaluation of us, our integrity, or that you might find important in your evaluation of us. Our Broker-Dealer affiliate has legacy disclosures. Details regarding these disclosures can be located by using BrokerCheck, which is a free tool to research the background and experience of financial brokers, advisors and firms.

BrokerCheck is accessed by going to <https://brokercheck.finra.org/>. You can also find information from the U.S. Securities Exchange Commission ("SEC") on both Investment Adviser firms and individuals registered with the SEC at <https://www.adviserinfo.sec.gov/>

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Pending and Current Registrations with broker/dealers.

The majority of our employees and all of our management personnel are dually registered with both our investment adviser and our broker dealer. We do not allow our employees to register with an outside firm.

Registrations or applications of our Firm or associated person(s) with futures commission or commodity pool operators.

We are not registered with the Commodities and Futures Trading Commission, nor do we advise clients on commodities markets.

Material Relationships and Conflicts of Interest

We have an obvious incentive for you to become our client which creates either commissions or advisory fees for our firm. Other conflicts of interest that could affect retail investors include:

- Our Advisors could receive variable compensation based upon brokerage services or investment advisory services that they provide to the client.
- Our Advisors receive a bonus based upon meeting certain production goals.
- Our Advisors could receive a bonus based upon new recurring revenue assets.
- Some Advisors, acting in the role of product coordinator, may earn additional compensation based upon their role in the sales of certain investment products such as annuities, fixed income securities and insurance.
- IRA Rollover advice: Retirement plan participants seeking advice on what to do with their plan assets, (e.g., 401(k), 403(b), etc.), should compare plan costs with the fees for investment options, trades, annual account fees and any termination costs before rolling to an IRA.

Revenue Sharing: Cash balances in an account may be invested in money market mutual funds including, as permitted by law, those with which we have agreements to provide advisory, administrative, distribution, and other services and for which we receive compensation for the services rendered. In a low interest rate environment, the yield that you earn on cash and cash alternatives, including cash sweep funds, CDs and money market funds, may not offset advisory fees. In some instances, the effective yield of the investment may, in fact, be negative. If you desire to maintain cash balances for other than a short-term period and/or are seeking the highest yields currently available in the market, please contact your financial professional to discuss investment options.

Recommendation and selection of other investment advisers for your account(s.)

Currently the investment advisers with which we work are: Wells Fargo Advisors, LLC, SEI Investment Management Corporation and Schwab.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code of Ethics

Our Code of Ethics covers our Firm's policies with regard to the conduct of the employees of our Firm. It requires their compliance with regulations, fiduciary duties and standards of conduct. It addresses areas such as their obligations to you, our client(s), personal securities transactions, trading and holdings, our review of the activity of access persons, and privacy and non-public information. If you would like a copy of this document, please request it through the contact information shown on the cover page of this brochure.

Participation or Interest in Client Transactions

Our related broker/dealer may buy, as principal, securities from your account; they in turn may sell those securities to their brokerage clients. We will only do so with your written acknowledgement, and at the prevailing market price. Our preference is to conduct trades on a non-principal basis.

Personal Trading

Our firm allows employees to trade in the same securities as those traded in your account. At no time however, may they receive a better price than you or trade in their own accounts in quantities that could affect the price of a security. Their personal trading is closely monitored to assure that they are placing your interest ahead of their own.

BROKERAGE PRACTICES

Factors in recommending or selecting brokers to execute trades

Research or Soft Dollar Benefits

We do not receive soft dollar benefits for the execution of trades in your accounts.

Trading Practices

As noted on pages 4-12 of this brochure, all advisory clients with managed accounts in wrap fee programs should expect trades in those accounts to be executed through the sponsors of those programs.

Brokerage for Client Referrals

In our selection or recommendation of broker/dealers for your account we do not consider any referrals from any broker/dealer or third parties.

Directed Brokerage

Not all advisers require clients to direct brokerage. With your permission we only direct your business to our affiliate, based upon best execution. Occasionally, a client will direct us to a certain broker/dealer as they have a situation where they receive rebates from that broker/dealer. In that event, however, we do not monitor those execution costs unless directed to by the client.

Aggregation of Trades

We aggregate trades whenever possible, given that aggregated trades normally result in the best execution.

Economic benefits of being on the Schwab platform

Sage, Ruty & Co., Inc. (Sage) may recommend/require that clients establish accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. The final decision to custody assets with Schwab is at the discretion of the Advisor's clients, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA accountholder.

Sage is independently owned and operated and not affiliated with Schwab. Schwab provides us with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to advisors. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab also makes available to us other products and services that benefit the Firm but may not benefit our clients' accounts. These benefits may include national, regional or Firm specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Sage by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities.

Other of these products and services may assist us in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of fees from our clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting.

Many of these services generally may be used to service all or some substantial number of our accounts, including accounts not maintained at Schwab Advisor Services. Schwab Advisor Services also makes available to us other services intended to help Sage manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing.

In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to Sage by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. While, as a fiduciary, Sage, Ruty endeavors to act in its clients' best interests, our recommendation/requirement that clients maintain their assets in accounts at Schwab may be based in part on the benefit to us of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

REVIEW OF ACCOUNTS

On a quarterly basis you will receive a written report that will show your investments, your rate of return and profits/losses on your position(s). This will be compared to the indices that best represent your stated investment objective. Your financial advisor will review this material and be available to discuss it with you if you have any questions.

Additionally, we have personnel from our supervisory staff review accounts based upon exception reports (factors which note activity or performance that was unexpected.) This is done on a routine basis.

CLIENT REFERRALS AND OTHER COMPENSATION

Neither our Firm nor Financial Advisors receive items of value, in the form of prizes, awards or items of economic benefit from non-clients.

CUSTODY

The qualified custodian for your account will either be First Clearing, LLC¹, SEI Investment Management Corporation or Schwab Advisor Services, a division of Charles Schwab & Co., Inc ("Schwab"). They will be sending you quarterly account statements, unless you have monthly purchases, sales, deposits, withdrawals, or other activity that will generate a monthly statement. You should examine closely these statements and report any error immediately, preferably in writing to us, as well as to the custodian.

INVESTMENT DISCRETION

The majority of our accounts are supervisory, although we could have accounts that we may manage on a discretionary basis as requested. Discretion must be granted to us by you in writing and is limited to the purchase or sale of securities; we do not have the authority to make withdrawals or deposits to your account. If you have limitations on the type of investments we have discretion for, you must provide us those instructions in writing. If you would like us to make periodic withdrawals or payments from your account, that must also be done in writing.

¹First Clearing is a trade name used by Wells Fargo Clearing Services, LLC, Member SIPC, a registered broker-dealer and non-bank affiliate of Wells Fargo & Company.

VOTING CLIENT SECURITIES

We do not vote proxies on behalf of our clients. You should receive all proxies from your custodian, directly from the company, or the transfer agent. You may receive these electronically as well. If you wish to discuss the matters contained in the proxy, please call your financial advisor.

FINANCIAL INFORMATION

Custody

We do not have custody of your assets or cash. We do however collect management fees in advance, or arrears, and deduct them from your account with your written permission. (See above.) Although Sage, Rutty does not act as a qualified custodian of our client assets, according to the definition of "custody" by the SEC, there are instances where we may have what is considered to be "inadvertent custody." For instance, "inadvertent custody" may occur when a client requests that we move monies between two or more of their accounts. Having the authority to open an account on behalf of a client, or being able to change the client's address of record with the qualified custodian, or having the ID number and password to a client's retirement fund to re-balance and adjust investments in the account, are also examples of "inadvertent custody" according to the SEC.

Due to the service level we wish to provide our clients, we have decided to continue to provide these services and incur "inadvertent custody" per the definition provided by the SEC. As a result, Sage is subject to an annual custody audit, which is conducted on a surprise basis by an independent CPA firm registered as a member of the Public Company Accounting and Oversight Board.

Our Financial Condition

Sage, Rutty remains financially stable and as such, we do not have any financial condition that could reasonably be expected to impair our financial commitment to our clients.



Zachary T. Armstrong, CFP®

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Zachary T. Armstrong, CFP® that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Zachary T. Armstrong, CFP® is available on the SEC's website at www.adviserinfo.sec.gov.

Zachary T. Armstrong, CFP®

Educational Background and Business Experience

Zach Armstrong, CFP® focuses on helping clients achieve financial well-being through a comprehensive personal financial planning process. Zach works with clients on numerous issues including, but not limited to, making investment recommendations, assisting with insurance needs planning, and putting a plan in place for college savings.

Zach also spends much of his time specializing in providing personalized retirement planning and projections for his clients. Overall, he aims to deliver solutions for all of his clients' financial planning needs. Zach holds certifications as a General Securities Representative (Series 7), Registered Investment Advisor (Series 66), and a NYS Life Accident & Health Insurance License. Born in 1989, Zach is an honors graduate from the University of Rochester and has been involved in the financial services industry since 2010.

Disciplinary Information

Mr. Armstrong has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Armstrong is not involved in any outside business activities.

Additional Compensation

Mr. Armstrong does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Armstrong may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Ruddy & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Kristin M. Dowejko

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Kristin Dowejko that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowwater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Kristin Dowejko is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Dowejko – Kris began her financial services career with Value-Trac Capital Management in 1990 and joined Sage Rutty as a Financial Advisor in 1997. She earned her Bachelor of Science Degree from the University of Buffalo with a dual concentration in Finance and Computer Science. Ms. Dowejko was born in 1969 and she holds licenses from the New York State Insurance Department and the Financial Industry Regulatory Authority (FINRA), including the General Securities Principal license.

Disciplinary Information

Ms. Dowejko has no legal or disciplinary events to disclose.

Other Business Activities

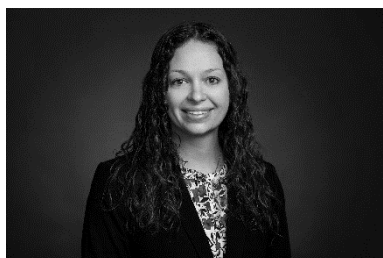
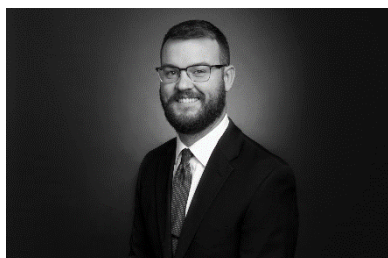
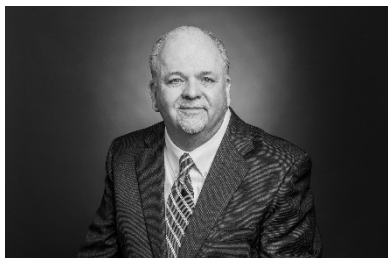
Ms. Dowejko is co-owner of From the Heart Press which is not an investment related activity.

Additional Compensation

Ms. Dowejko does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Dowejko may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Parker Burke Group

Douglas E. Parker, CFP®, AIF®

James P. Burke, CFP®, AIF®

Craig D. Gingerich, CFP®, AIF®

Colin Young, CFP®, AIF®

Sarah Stymus

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Douglas E. Parker, CFP®, AIF®, James P. Burke, CFP®, AIF®, Craig D. Gingerich, CFP®, AIF®, Colin Young, CFP®, AIF®, and Sarah Stymus that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at lohwater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Douglas E. Parker, CFP®, AIF®, James P. Burke, CFP®, AIF®, Craig D. Gingerich, CFP®, AIF®, Colin Young, CFP®, AIF® and Sarah Stymus is available on the SEC's website at www.adviserinfo.sec.gov.

Douglas Parker, CFP®, AIF®

Educational Background and Business Experience

Mr. Parker - Doug joined Sage Rutty & Company in 1996. He began his investment industry career with PaineWebber in 1987. Born in 1958, Doug is a graduate of Roberts Wesleyan College where he majored in Organizational Management and holds a Master's Degree in Financial Planning from the College for Financial Planning. Doug also received his Certified Financial Planner™ certification in 1996. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination as well as meet the following prerequisites: bachelor's degree from an accredited college or university and three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP-board registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS. Doug has also received his Accredited Investment Fiduciary® (AIF®) designation. AIF® designees have the ability to implement a prudent process into their own investment practices as well as being able to assist others in implementing proper policies and procedures. AIF® designation is granted by Fi360 to individuals who: Enroll in and complete the AIF® Training, pass the AIF® Examination, meet the experience requirements, and satisfy the Code of Ethics and Conduct Standards. Doug is a member of the Boards of Directors of the Estate Planning Council of Rochester, Sage Rutty & Co., Inc., and the Catholic Family Center. He also sits on the pension committee of the Catholic Charities. He is a member of the Financial Planning Association and the Entrepreneurs Organization.

Disciplinary Information

Mr. Parker has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Parker is not involved in any business activities outside of Sage Rutty & Co., Inc.

Additional Compensation

Mr. Parker does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Parker may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.

James P. Burke, CFP®, AIF®

Educational Background and Business Experience

Mr. Burke – Jim, joined Sage Ruttly in 1992, prior to that he spent 4 years in public accounting with PriceWaterhouse Coopers. Jim graduated from St. Bonaventure University with a Bachelor of Science Degree in Accounting in 1988 and has remained active with the college's alumni association. He received his Certified Financial Planner™ certification in 2002.

Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination and as well as meet the following prerequisites: bachelor's degree from an accredited college or university and three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP board-registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business, economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS. Jim has received his Accredited Investment Fiduciary® (AIF®) designation. AIF® designees have the ability to implement a prudent process into their own investment practices as well as being able to assist others in implementing proper policies and procedures. AIF® designation is granted by Fi360 to individuals who: Enroll in and complete the AIF® Training, pass the AIF® Examination, meet the experience requirements, and satisfy the Code of Ethics and Conduct Standards. Jim also graduated from the Wharton School's Securities Industry Institute in 1997. He was born in 1966.

Disciplinary Information

Mr. Burke has no legal or disciplinary events to disclose

Other Business Activities

Mr. Burke is not involved in any business activities outside of Sage Ruttly & Co., Inc.

Additional Compensation

Mr. Burke does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Burke may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Ruttly & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.

Craig D. Gingerich, CFP®, AIF®

Educational Background and Business Experience

Mr. Gingerich – Craig joined Sage Rutty & Company in 2014. He began his career in financial services with Manning & Napier the prior year. Craig is a graduate of The State University of New York, College at Brockport with a Bachelor's Degree in Marketing. Craig earned his Certified Financial Planner™ designation in 2016. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who meet the following prerequisites: Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university, pass the comprehensive CFP® Certification Examination, complete at least three years of full-time financial planning-related experience, and agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals. Craig has also received his Accredited Investment Fiduciary® (AIF®) designation. AIF® designees have the ability to implement a prudent process into their own investment practices as well as being able to assist others in implementing proper policies and procedures. AIF® designation is granted by Fi360 to individuals who: Enroll in and complete the AIF® Training, pass the AIF® Examination, meet the experience requirements, and satisfy the Code of Ethics and Conduct Standards. Craig serves as chair of the Emerging Leaders Society for the Greater Rochester United Way and is a member of the Financial Planning Association. Craig is a part of the Estate Planning Council. He is also a member of the Rochester Chamber of Commerce Chamber Leadership Initiative Mentoring for Business Program (CLIMB). Craig was born in 1991.

Disciplinary Information

Mr. Gingerich has no legal or disciplinary events to disclose

Other Business Activities

Mr. Gingerich is not involved in any business activities outside of Sage Rutty & Co., Inc.

Additional Compensation

Mr. Gingerich does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Gingerich may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.

Colin Young, CFP®, AIF®

Educational Background and Business Experience

Colin joined Sage Ruttly & Company, Inc. in 2015. Born in 1987, Colin is a graduate of The State University of New York at Oswego with a Bachelor of Arts degree in Public Relations and Journalism. Colin earned his Certified Financial Planner™ designation in 2020. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who meet the following prerequisites: Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university, pass the comprehensive CFP® Certification Examination, complete at least three years of full-time financial planning-related experience, and agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals. Colin has also received his Accredited Investment Fiduciary® (AIF®) designation. AIF® designees have the ability to implement a prudent process into their own investment practices as well as being able to assist others in implementing proper policies and procedures. AIF® designation is granted by Fi360 to individuals who: Enroll in and complete the AIF® Training, pass the AIF® Examination, meet the experience requirements, and satisfy the Code of Ethics and Conduct Standards. Colin has also achieved the designation of Certified 401(k) Professional (C(k)P®). The C(k)P® designation is issued by The Retirement Advisor University in collaboration with UCLA Anderson School of Management Executive Education and is granted to individuals who: Enroll in and complete the C(k)P training program, pass the C(k)P® Examination, and meet the minimum experience and assets under management requirements. Colin is a member of the Auxiliary Board at Monroe Community Hospital. He completed the Rochester Chamber of Commerce Chamber Leadership Initiative Mentoring for Business (CLIMB) Program in 2021.

Disciplinary Information

Mr. Young has no legal or disciplinary events to disclose

Other Business Activities

Mr. Young is not involved in any business activities outside of Sage Ruttly & Co., Inc.

Additional Compensation

Mr. Young does not receive any additional compensation bonuses based upon referrals or new accounts. Colin may receive a bonus based upon new recurring revenue assets.

Supervision

Activity in accounts managed by Mr. Young may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Ruttly & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.

Sarah Stymus

Educational Background and Business Experience

Ms. Stymus – Sarah joined Sage Ruty & Company, Inc. in 2022 and is a Financial Advisor. She obtained her bachelor's degree in Criminal Justice from the State University of New York at Brockport in May 2006. She previously worked as a Private Client Banker at JP Morgan Chase Bank NA. She was born in 1983.

Disciplinary Information

Ms. Stymus has no legal or disciplinary events to disclose

Other Business Activities

Ms. Stymus is not involved in any business activities outside of Sage Ruty & Co., Inc.

Additional Compensation

Ms. Stymus does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Stymus may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Ruty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Laura J. Parker, MBA

Sage Ruty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Laura J. Parker that supplements the Sage Ruty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sageruty.com if you did not receive Sage Ruty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Laura J. Parker is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Laura J. Parker joined Sage Rutty in 2003 starting in the Bond Department as a Financial Services Associate. In 2007, Laura took the role of Operations Manager overseeing the day-to-day operations of Sage Rutty and the support staff. Now, as a Financial Advisor, Laura draws on her operational & managerial background to provide her clients with the utmost in customer care and personal attention in developing customized financial plans. Laura is a graduate of the University of Michigan and holds a Bachelor of Arts in Psychology. She also holds a Masters in Business Administration from the Bittner School of Business at St. John Fisher College. Laura was born in 1977. She is licensed with the Financial Industry Regulatory Authority (FINRA) and the New York State Insurance Department. Laura is the President of the Friends of the Rochester Public Market and Vice President for Priceless Vessels. Laura is an active member of the Greater Rochester Chamber of Commerce Women's Council. She is also a member of the Al Sigl Council, Rochester Women's Network and Coalition on Pay Equity. In December of 2012, Laura was featured in the Democrat & Chronicle's Women to Watch.

Disciplinary Information

Ms. Parker has no legal or disciplinary events to disclose.

Other Business Activities

Ms. Parker is not involved in any outside business activities.

Additional Compensation

Ms. Parker does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Parker may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Connor B. Holly, CFP®

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Connor B. Holly, CFP® that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowwater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Connor B. Holly, CFP® is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Connor joined Sage Rutty & Company as a Financial Advisor in 2011. He focuses on developing a financial plan for his clients to act as the keystone to their retirement planning. Connor joined the Sage Rutty family after graduating from The State University of New York at Fredonia with a Bachelor of Science degree in Business and Finance and received his Certified Financial Planner™ certification in 2016. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination and have a minimum of three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP-board registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS.

Connor enjoys giving back to his community by actively participating in various charitable events and is on the Board for Big Brothers Big Sisters of Greater Rochester. He holds several licenses through the Financial Industry Regulatory Authority (FINRA) and is licensed with the New York State Insurance Department. Connor was born in 1988.

Disciplinary Information

Mr. Holly has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Holly is not involved in any outside business activities.

Additional Compensation

Mr. Holly does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Holly may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Katrina M. Smith, CFP®

Sage Ruty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Katrina M. Smith, CFP® that supplements the Sage Ruty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sageruty.com if you did not receive Sage Ruty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Katrina M. Smith, CFP® is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Smith – Katrina began her career in the financial services industry in 1982 and joined Sage Rutty in 2001. She obtained her Certified Financial Planner™ certification in 2003. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination and have at least three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP-board registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS. She was born in 1959.

Disciplinary Information

Ms. Smith has no legal or disciplinary events to disclose.

Other Business Activities

Ms. Smith is not involved in any outside business activities.

Additional Compensation

Ms. Smith does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Smith may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Ryleigh M. Mattle, MBA

Sage Rutty & Co., Inc.

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585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Ryleigh M. Mattle, MBA that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Ryleigh M. Mattle, MBA is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Mattle – Ryleigh was born in 1994. She obtained her MBA from St. John Fisher College and earned her Bachelor of Science Degree in Actuarial Science from Bowling Green State University. She joined Sage Rutty in 2018 as a Financial Advisor. Ms.

Mattle holds certifications as a General Securities Representative (Series 7) and Registered Investment Advisor (Series 66) with the Financial Industry Regulatory Authority (FINRA), a NYS Life Accident & Health Insurance License, and performs as a notary public.

Disciplinary Information

Ms. Mattle has no legal or disciplinary events to disclose.

Other Business Activities

Ms. Mattle is involved in an outside business activity which is not investment related. Ryleigh will be serving as an adjunct professor at Nazareth College for the Fall 2022 semester.

Additional Compensation

Ms. Mattle does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Mattle may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



David DeWind

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about David DeWind that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about David DeWind is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

David L. DeWind – Dave was born in 1959 and he leverages over 25 years of experience as a Financial Advisor to coach clients in identifying their financial objectives, then charting strategies to achieve those objectives. His focus continues to be portfolio development and retirement planning. In 2015 Dave became a Chartered Retirement Planning CounselorSM or CRPC® designee. Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements. Dave graduated from State University of New York at Fredonia with a Bachelor's of Science in Business Administration and Marketing. Dave is active in the community with the Rochester Area Business Ethics Foundation, past President of the Fairport Baseball Booster Club, and supports various youth programs.

Disciplinary Information

Mr. DeWind has no legal or disciplinary events to disclose.

Other Business Activities

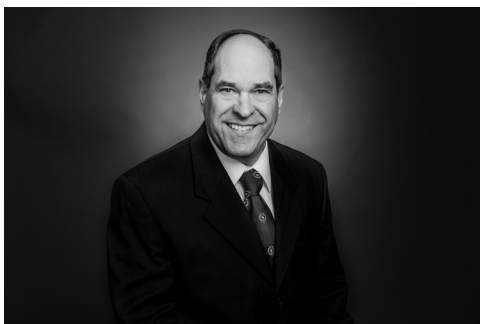
Mr. DeWind is not involved in any outside business activities.

Additional Compensation

Mr. DeWind does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. DeWind may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Curt Ehrlich

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Curt Ehrlich that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowwater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Curt Ehrlich is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Mr. Ehrlich—Curt joined Sage Ruttly after a 20-year career in financial investigations. He has over 35 years' experience with financial markets and investments and holds a Master of Science degree in Finance from Rochester Institute of Technology. He was born in 1961.

Disciplinary Information

Mr. Ehrlich has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Ehrlich is not involved in any outside business activities.

Additional Compensation

Mr. Ehrlich does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Ehrlich may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client.

Trevor Holly, President of Sage Ruttly & Co., Inc, who may be reached at (585) 232-2309 performs those reviews.



Caroline Hill, MBA

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Caroline Hill that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Caroline Hill is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Caroline Hill was born in 1988. She earned her M.B.A. from the University of Akron and Bachelor's in Chinese Studies from St. Lawrence University. Prior to joining Sage Ruty, Caroline left the corporate world with Xerox Corporation and then spent several years building her practice at Brighton Securities. At the end of 2018 Caroline successfully completed an Executive Education Certificate: Investment Practice Management & Theory provided through the Yale University School of Management.

Caroline is licensed as a registered representative and investment advisor representative. Caroline is also licensed to provide Life, Accident, and Health Insurance in NY state.

Disciplinary Information

Ms. Hill has no legal or disciplinary events to disclose.

Other Business Activities

Ms. Hill is not involved in any outside business activities.

Additional Compensation

Ms. Hill does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Hill may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Ruty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Wayne Holly

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
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March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

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Additional information about Wayne Holly is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Mr. Holly is Executive Chairman of Sage Rutty & Company. Joining the firm in 1980, Wayne assumed the role of President, after mastering many positions within the firm. Wayne received his Bachelor of Science degree in Finance and Economics from Alfred University in 1978. Mr. Holly is licensed as a registered representative and an investment advisor representative. He was born in 1956.

Disciplinary Information

Mr. Holly has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Holly is not involved in any outside business activities.

Additional Compensation

Mr. Holly does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Holly may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Robert Lohwater Chief Compliance Officer of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Jeff Jones

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

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Additional information about Jeff Jones is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Mr. Jones was born in 1994 and is currently a Financial Advisor. He earned his Bachelor of Science Degree in Business Administration from the State University of New York at Geneseo. Mr. Jones holds certifications as a General Securities Representative (Series 7) and Registered Investment Advisor (Series 66) with the Financial Industry Regulatory Authority (FINRA) and a NYS Life Accident & Health Insurance License. Prior to joining Sage Ruty, Mr. Jones worked in sales and data analytics focusing on delivering value through cost analysis, labor optimization, and strategic training initiatives.

Disciplinary Information

Mr. Jones has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Jones is not involved in any outside business activities.

Additional Compensation

Mr. Jones does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Jones may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Ruty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Steven R. Kurvach

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Steven R. Kurvach that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowwater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Steven R. Kurvach is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Mr. Kurvach – Steve was born in 1985, he graduated from Rochester Institute of Technology with a BS in Applied Science & Technology in 2007. Prior to being in the financial services industry, Steve served as an Infantry Officer in the United States Army with the 10th Mountain and 101st Airborne Divisions. He has worked in the financial services industry since 2018, where he focuses on financial planning, investment advice, and needs-based insurance planning for individuals and families.

In 2019, Steve became an Accredited Portfolio Management Advisor® or APMA® designee.

Individuals who hold the APMA® designation have completed a course of study encompassing portfolio creation, augmentation, and maintenance. Additionally, individuals must pass an end-of-course examination that tests their ability to analyze investment policy statements, building portfolios, and making asset allocation decisions. Individuals renew their designation every two-years by completing 16 hours of continuing education.

Disciplinary Information

Mr. Kurvach has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Kurvach is involved in an outside business activity which is not investment related. Steven is an author of poetry and short stories that are pending publication in book form titled; 'Someday Is A Graveyard.'

Additional Compensation

Mr. Kurvach does not receive any additional compensation bonuses based upon referrals or new accounts. Steve may receive a bonus based upon new recurring revenue assets.

Supervision

Activity in accounts managed by Mr. Kurvach may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Joseph J. Nacca

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Joseph J. Nacca that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Joseph Nacca is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Mr. Nacca – Joe has been with Sage Ruty & Co., Inc. since 2004, and is a Financial Advisor. He obtained his bachelor's degree in Economics from the University of New Mexico in 2003. In 2012 Joe achieved his designation as a Certified Trust Financial Advisor awarded by the American Bankers Association. To obtain this designation, Joe had to pass a thorough exam, and complete 45 credits of continuing education over three years. A minimum of 6 hours in each of four knowledge areas, plus 3 credits in ethics training. Mr. Nacca was born in 1979, first became licensed in the securities industry in 2004, and has been a Registered Investment Advisor since 2009.

Disciplinary Information

Mr. Nacca has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Nacca is not involved in any outside business activities.

Additional Compensation

Mr. Nacca does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Nacca may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Ruty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Kim L. Nugent, CFP®

Sage Rutty & Co., Inc.

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585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Kim L. Nugent, CFP® that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowwater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Kim L. Nugent, CFP® available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Nugent – Kim joined Sage Rutty in 2010 as a Financial Advisor. She was born in 1956 and received her Bachelor of Science Degree in Biology from the State University of New York at Geneseo in 1988. She was first licensed in the securities industry in 2004 and received her Certified Financial Planner™ certification in 2008. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination and have a minimum of three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP-board registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS. Kim has also received her Accredited Investment Fiduciary® (AIF®) designation. AIF® designees have the ability to implement a prudent process into their own investment practices as well as being able to assist others in implementing proper policies and procedures. AIF® designation is granted by Fi360 to individuals who: Enroll in and complete the AIF® Training, pass the AIF® Examination, meet the experience requirements, and satisfy the Code of Ethics and Conduct Standards.

Disciplinary Information

Ms. Nugent has no legal or disciplinary events to disclose

Other Business Activities

Ms. Nugent is not involved in any outside business activities.

Additional Compensation

Ms. Nugent and the firm act as a placement agent for a private placement that may be recommended to advisory clients for which the firm and Ms. Nugent receive compensation. Such recommendations are only made after determining the prospective advisory client is an "Accredited Investor" as defined under Rule 501 of Regulation D of the Securities Act of 1933. At a minimum, the items reviewed with the client for such a recommendation include the underlying investments or physical properties, tax aspects, risks, and characteristics of the sponsor including financing and experience. This investment, if purchased, is held outside of an advisory account and considered an "Excluded Asset." As noted in Part 2A of this Brochure, under Fees and Compensation (pgs. 11-15), excluded assets are not also charged a program fee and are not considered part of a wrap program or program services. Ms. Nugent does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Nugent may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Joseph S. Parks

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

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**Additional information about Joseph S. Parks
Is available on the SEC's website at www.adviserinfo.sec.gov.**

Educational Background and Business Experience

Joseph Parks is a Financial Advisor with Sage Ruttly & Company. Joe was born in 1984 and graduated from University at Albany with a bachelor's degree in Sociology. Prior to being in the financial services industry, Joe worked as a contracted program manager for NAVAIR and the V-22 Osprey program at Cherry Point N.C. He has worked in the financial services industry since 2018 where he has focused on financial planning, investment recommendations, and insurance needs planning for individuals and families.

In 2020 Joe became an Accredited Portfolio Management Advisor® or APMA® designee. Individuals who hold the APMA® designation have completed a course of study encompassing portfolio creation, augmentation, and maintenance. Additionally, individuals must pass an end-of-course examination that tests their ability to analyze investment policy statements, building portfolios, and making asset allocation decisions. Individuals renew their designation every two-years by completing 16 hours of continuing education.

Disciplinary Information

Mr. Parks has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Parks is not involved in any outside business activities.

Additional Compensation

Mr. Parks does not receive any additional compensation bonuses based upon referrals or new accounts. Joe may receive a bonus based upon new recurring revenue assets.

Supervision

Activity in accounts managed by Mr. Parks may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Ruttly & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Teresa Robinson, CFP®

Sage Rutty & Co., Inc.

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585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Teresa Robinson, CFP® that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Teresa Robinson available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Robinson - Teresa joined Sage Rutty in 2013 and is a Financial Advisor. She graduated summa cum laude from Mercyhurst College in 2004 with a bachelor's degree in Art Therapy. In addition, Teresa earned her master's degree in Art Therapy from Nazareth College in 2006. She holds certifications as a General Securities Representative (Series 7), Uniform Securities Agent (Series 63) and Uniform Investment Adviser (Series 65) with the Financial Industry Regulatory Authority (FINRA), and a NYS Life Accident & Health Insurance License. Teresa earned her Certified Financial Planner® designation in 2021. also holds the Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination and have a minimum of three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP-board registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS. She was born in 1982.

Disciplinary Information

Ms. Robinson has no legal or disciplinary events to disclose.

Other Business Activities

Ms. Robinson is not involved in any business activities outside of Sage Rutty & Co., Inc.

Additional Compensation

Ms. Robinson does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Robinson may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Brennan Redmond, CFA, CFP®

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Brennan Redmond, CFA, CFP® that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Brennan Redmond, CFA, CFP® available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Brennan, born in 1981, graduated *cum laude* from the Rochester Institute of Technology with a bachelor's degree in Business Finance in 2003. Upon graduation Brennan began work in the equity research department of a large, international investment management firm. In 2007, Brennan made the career change to consulting directly with individuals. In

2009 Brennan earned the Chartered Financial Analyst™ (CFA) credential, which is regarded as the most respected and recognized investment management designation in the world. The CFA credential is earned over three rigorous examinations covering: ethical and professional standards, quantitative methods, economics, financial reporting and analysis, corporate finance, equity investments, fixed-income investments, derivatives, alternative investments, portfolio management, and wealth planning.

Brennan earned his Certified Financial Planner™ designation in 2018. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who meet the following prerequisites: Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university, pass the comprehensive CFP® Certification Examination, complete at least three years of full-time financial planning-related experience, and agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

In 2017 Brennan joined Sage Rutty & Company as a First Vice President, Financial Advisor. His practice primarily focuses on financial planning, investment management, and tax minimization strategies.

Disciplinary Information

Mr. Redmond has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Redmond is not involved in any outside business activities.

Additional Compensation

Mr. Redmond does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Redmond may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Sage Advisors
Neil S. Frood, JD
Laura S. Frood, CFP®, AAMS®

Sage Rutty & Co., Inc.
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585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

**This brochure supplement provides information about
Neil S. Frood, JD, and Laura S. Frood, CFP®, AAMS®
that supplements the Sage Rutty & Co., Inc. brochure.**

You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Neil S. Frood, JD, and Laura S. Frood, CFP®, AAMS® is available on the SEC's website at www.adviserinfo.sec.gov

Neil S. Frood, JD

Educational Background and Business Experience

Neil Frood, JD, is a Rochester native, born in 1974. He attended Cornell University for his undergraduate schooling and received his Juris Doctor from the State University at Buffalo School of Law. While at University of Buffalo, he received a Certificate of Concentration in Financial Transactions. Prior to joining Sage Rutty & Company, Neil practiced law at one of the oldest law firms in Rochester in the areas of estate and gift taxation. Neil joined Sage Rutty in 2001 as a member of the Sage Advisors Team at Sage Rutty. He is still a member of the New York State Bar and, as such, is required to complete over 30 hours of continuing legal education every two years. Neil focuses his financial practice in the areas of retirement and income planning. He is a past speaker at the Monroe County Bar Association and author of several articles in the area of financial planning.

***Disciplinary Information
Other Business Activities***

Mr. Frood has no legal or disciplinary events to disclose.

Neil is a member of the New York State Bar and, as such, licensed to practice law within New York State. He has maintained a small private practice in the past and assisted clients with estate planning and administration using an hourly fee schedule. Neil will be serving as the Co-Sponsorship Chair for the Brighton Baseball, Inc. organization and this involvement will not be investment related.

Additional Compensation

Mr. Frood does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Frood may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.

Laura S. Frood, CFP®, AAMS®

Educational Background and Business Experience

Ms. Laura Frood, CFP®, AAMS® began her career in the financial services industry directly out of college, in June 2000. Laura was born in 1978 in New Albany, Indiana and attended Indiana State University, graduating magna cum laude with a bachelor's degree in Economics. In 2001, Laura moved to Rochester and joined Sage Rutty as a member of the Sage Advisors Team and became a CFP® practitioner in 2021. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination and have a minimum of three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP-board registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS. The AAMS® designation requires 16 hours of continuing education every 2 years. Laura focuses her financial practice in the area of investment planning and management. Laura enjoys educating young adults on the importance of financial planning and is an in-demand speaker for a few of the local high schools. She is active in the community and enjoys volunteering with Junior Achievement.

Disciplinary Information

Other Business Activities

Ms. Frood has no legal or disciplinary events to disclose.
Ms. Frood is involved in an outside business activity which is not investment related. Laura will be serving as the Co-Sponsorship Chair for the Brighton Baseball, Inc. organization.

Additional Compensation

Ms. Frood does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Frood may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Kimberly Schulwitz, MBA

Sage Rutty & Co., Inc.

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585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Kimberly Schulwitz, MBA that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Kimberly Schulwitz, MBA available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Schulwitz - Kim joined Sage Rutty in 2021 and has worked as a Financial Advisor since 2016. She graduated from St. John Fisher College with a bachelor's degree in Psychology and minors in Philosophy and Business Administration. In addition, Kim earned a Master of Business Administration degree from the University of Massachusetts. She holds certifications as a General Securities Representative (Series 7) and Registered Investment Advisor (Series 66) with the Financial Industry Regulatory Authority (FINRA), and a NYS Life Accident & Health Insurance License. She was born in 1970.

Disciplinary Information

Ms. Schulwitz has no legal or disciplinary events to disclose.

Other Business Activities

Ms. Schulwitz is not involved in any business activities outside of Sage Rutty & Co., Inc.

Additional Compensation

Ms. Schulwitz does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Ms. Schulwitz may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



David Swain

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
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March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about David Swain that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about David Swain available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Dave Swain spent his first career helping others as a Police Investigator with the Rochester Police Department. Upon his retirement from the RPD, Dave became a Financial Advisor with Sage Rutty. He focuses on helping clients achieve financial well-being through a comprehensive personal financial planning process. Dave works with clients on numerous issues including, but not limited to, making investment recommendations, assisting with insurance needs planning, knowledge with 457, 401, 403, and Federal Government retirement plans, as well as, putting a plan in place for college savings. Overall, he aims to deliver peace of mind for his clients' future. Dave holds certifications as a General Securities Representative (Series 7), Registered Investment Advisor (Series 66), and a NYS Life Accident & Health Insurance License. Born in 1972, Dave is a graduate from the SUNY Geneseo class of 1995 and has been working at Sage Rutty since 2018.

Disciplinary Information

Mr. Swain has no legal or disciplinary events to disclose.

Other Business Activities

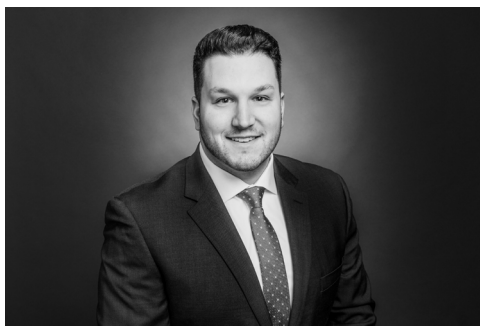
Mr. Swain is not involved in any business activities outside of Sage Rutty & Co., Inc.

Additional Compensation

Mr. Swain does not receive any additional compensation bonuses based upon referrals or new accounts.

Supervision

Activity in accounts managed by Mr. Swain may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Trevor Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-2309, performs those reviews.



Aaron Young, MSPFP, CFP®, CRPC®, CHSA®, AIF®

Sage Rutty & Co., Inc.

100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 30, 2023

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Aaron Young, CFP®, AIF® that supplements the Sage Rutty & Co., Inc. brochure. You should have received a copy of that brochure. Please contact Robert Lohwater, Chief Compliance Officer at rlowater@sagerutty.com if you did not receive Sage Rutty & Co., Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Aaron Young, CFP®, AIF® available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Aaron Young joined Sage Ruttly & Co., Inc. in 2014 and is a member of the Financial Planning Department. Aaron started his career in financial services in 2011. He graduated Magna Cum Laude from SUNY Geneseo with a Bachelor of Science degree in business administration. Continuing his financial education, Aaron became a Certified Financial Planner™ practitioner. Accredited by the National Commission for Certifying Agencies (NCCA), this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who complete a CFP Certification Examination and have a minimum of three years of full time personal financial planning experience. In order to qualify, the candidate must complete a CFP-board registered program or hold one of the following titles: CPA, ChFC, Chartered Life Underwriter (CLU), CFA, PhD in business economics, Doctor of Business Administration or Attorney's License. Once issued, the candidate is required to complete 30 hours of continuing education every two years and must continuously meet the standards administered by CFPBS. Aaron also holds a Master of Science degree in Personal Financial Planning, is a Certified Retirement Planning Counselor®, a Certified Health Savings Adviser®, and is an Accredited Investment Fiduciary® certificant.

Aaron is a member of the Estate Planning Council of Rochester, and volunteers with the Pancreatic Cancer Association of WNY and Meals on Wheels. He was born in 1990.

Disciplinary Information

Mr. Young has no legal or disciplinary events to disclose.

Other Business Activities

Mr. Young is not involved in any business activities outside of Sage Ruttly & Co., Inc.

Additional Compensation

Mr. Young is strictly salaried. He does not receive any compensation based upon sales, referrals or new accounts.

Supervision

Mr. Young maintains no client accounts. As such, the financial planning process is separate and distinct from any sales advice.