

St. Germain Investment Management, Inc.
Customer Relationship Summary as of January 1, 2025

St. Germain Investment Management, Inc. (“St. Germain”) does business under different names, which are historically linked to our office locations and the communities we serve. St. Germain does business as October Mountain, Gage Wiley and New England Capital and is organized as a federally registered investment adviser. St. Germain is wholly owned by DJ St. Germain & Co.

Our firm makes recommendations under Regulation Best Interest and is providing this document to give you more information about our relationship with you, as a client. Throughout this summary we have called out “conversation starters” which you may wish to discuss with us. We have identified these items as bullet points.

What investment services and advice can you provide me?

We provide on-going, discretionary professional management of your portfolio, using investment strategies agreed upon with you, and intended to help you reach your goals. Discretion means that we will not contact you for trade decisions. We also offer customized financial planning which may include budgeting, cash flow and asset/liability assessments, retirement planning, and more. When needed and appropriate, we provide needs analysis and strategic use of selective insurance products to address asset protection goals, estate planning needs, long term care concerns, and business buy/sell agreements. Our firm monitors your investments in our Investment Advisory managed account programs on a daily basis.

The investment products utilized within our strategies include one or more of the following: common and preferred stocks; fixed income offerings including corporate, government and municipal bonds; mutual funds; exchange traded funds; and cash and cash- alternatives including money market funds and bank deposit accounts. We have account minimums that range from \$100,000 to \$500,000, depending on the investment strategy that is chosen by you, and subject to negotiation under certain circumstances. We do not offer proprietary products.

You can learn more about our Investment Advisory services by reviewing our entire Firm Brochure, which will be made available to you prior to or at the time of account opening. You may also wish to check our firm’s disciplinary history by accessing www.adviserinfo.sec.gov.

- ☒ Given my financial situation, should I choose an Investment Advisory service? Should I choose a Brokerage service? Should I choose both types of services? Why? How will you choose investments to recommend to me?
- ☒ What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

What fees will I pay?

Fees, costs, and other charges in the financial services industry can be confusing, but generally fall into these areas:

Management Fees (or Advisory fees): these are *asset-based fees* charged by St. Germain associated with the day-to-day responsibilities of managing your account. Your fee is based on the amount and composition of assets, the investment strategy chosen, the financial services required, and is agreed upon and disclosed in your *Investment Advisory Agreement*. Our fee covers implementing your chosen investment strategy, and ongoing monitoring of your assets. Additionally, it includes all account reviews, account reporting, and written commentaries, updates, and consultations. Advisory fees can create a conflict in that the more of your assets we manage, the more money we earn. We, therefore, have a benefit in suggesting you consolidate your assets with our firm.

Advisory Account Transaction Charges: These are the costs incurred upon the purchase or sale of holdings in your managed portfolio with us. Charges vary based on the specific class of assets bought or sold (stock, bond, mutual fund, etc.). Second, the costs may differ based on the *custodian* of your account. The custodians we use include Schwab and Capital Group/American Funds. Transaction costs are provided in a fee schedule when your account is opened and as updated. If you are unsure of your fee schedule, your Advisor can provide you the schedule applicable to your custodian and account.

Other Costs: Some investment holdings in our managed accounts, typically “pooled” investments such as mutual funds,

exchange traded funds, or variable annuities, contain embedded expenses related to management and operational costs of the fund itself. These costs are deducted from the assets of the fund, by the fund company/ sponsor, and retained by that company. This means that the net returns of the fund are reduced by the amount of those fees. None of these product costs are levied or received by us, and we always assess the impact of fund costs against the attributes of a fund before purchasing it for your account.

Incidental costs: For certain non-trade related transactions such as wire transfers you will incur additional charges. These charges are detailed in your account opening documentation and/or Service Agreement.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

- ☒ Help me understand how these fees and costs might affect my investments.
- ☒ If I give you \$10,000 to invest, how much will go to fees and costs and how much will be invested for me?

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my Investment Advisor? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your Investment Advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide to you. Here are some examples to help you understand what we mean.

We receive compensation from third parties from the sale of insurance products, and facilitating margin loans. Further details on these conflicts are provided in our Form ADV.

We, acting as principal, may occasionally buy or sell securities directly from clients. This is done on an infrequent basis and is typically done as a convenience to clients (e.g., purchasing an illiquid security from a client where no market is made).

Schwab, our custodian, makes certain services available that benefit us but may not benefit you. We have chosen Schwab as a custodian based on a number of factors, but these benefits could be seen as a conflict. You should read our Form ADV Part 2A to further understand our relationship with Schwab.

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

How do your financial professionals make money?

All employees of our firm are primarily compensated on a salary basis with the potential for bonuses based on certain criteria. Bonus payments are determined by a number of factors including job performance and firm profitability.

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

Yes. You can learn about our legal and disciplinary history at www.investor.gov/CRS and your financial advisors ADV Form 2B

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

Where can I go for more information?

For more information about our firm, we encourage you to go to our websites at www.stgermaininvestments.com, octobermountainfa.com or www.gagewiley.com. You can request a copy of the most recent Client Relationship Summary from these sites. You can also contact us at 800-443-7624 to obtain an up-to-date, free-of-charge, Customer Relationship Summary.

- ☒ Who is my primary contact person? Is he or she a representative of an Investment Advisor or Broker-Dealer?
- ☒ Whom can I talk to if I have concerns about how this person is treating me?

For additional information: Please reference our Form ADV Part 2A and 2B, <http://www.investor.gov/CRS>, <http://www.brokercheck.org> and/or your account documents provided when opening your account.