

Item 1: Introduction

As an investment adviser registered with the U.S. Securities and Exchange Commission (“SEC”), Stonegate Investment Group, LLC (“Us”, “Our”, “We” or “Stonegate”) offers investment advisory services to its clients. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: What investment services and advice can you provide me?

Ask your financial professional:

- ***“Given my financial situation, should I choose an investment advisory service? Why or why not?”***
- ***“How will you choose investments to recommend to me?”***
- ***“What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?”***

Stonegate provides investment advisory services to individuals, including high net worth individuals, and entities, including family offices, trusts, estates, private foundations, charities, small businesses, and pension and retirement/profit-sharing plans, on a fee-only basis. Stonegate may provide a variety of financial planning and consulting services to clients. Stonegate also provides investment advisory services to corporate, governmental and not-for-profit retirement plans pursuant to The Employee Retirement Income Security Act of 1974 (“ERISA”). We have no set minimum account size so long as we determine that a client is suitable to receive our services

If you open an account with our firm, we will meet with you to understand your current financial situation, existing resources, goals and risk tolerance. Based on what we learn, we will recommend a portfolio of investments that is regularly monitored, and if necessary, re-balanced to meet your changing needs, stated goals, and objectives. Our clients typically invest in equity securities of individual companies, bonds, mutual funds, exchange-traded funds (“ETFs”), and limited partnerships and pooled investment vehicles focusing on alternative asset classes. Stonegate also uses options, typically covered call options, protective put options, and long put and call options in client portfolios. We may also allocate a portion of a client’s portfolio to unaffiliated third-party investment advisers, in which event the client will be directed to or provided with that adviser’s brochure or other disclosure document. You have the ability to impose reasonable restrictions on their accounts from investing in certain securities, types of securities or industries.

If you utilize our investment advisory services, you will typically give us discretionary authority in the client agreement to buy and sell securities and funds in your account without your prior approval. By granting investment discretion to us, you authorize us to direct securities transactions and determine which securities are bought and sold, the total amount to be bought and sold, and the costs at which the transactions will be effected. You also may choose to have your assets managed on a non-discretionary basis, where we may make investment recommendations, but you make the ultimate decision regarding the purchase or sale of the investments.

We may recommend that clients use external managers based on the client’s needs and suitability. We do not receive separate compensation, directly or indirectly, from such external managers for recommending that clients use their services.

Our services can be offered as a wrap fee program where we combine securities transaction fees and other fees and expenses with our investment advisory fees.

We monitor the holdings and performance of the investments we make for you on an ongoing basis, and review your account with you at least annually, or more frequently, depending on your needs.

For additional information, please refer to our Form ADV Part 2A Brochure (“Brochure”), especially [Item 4](#) (services), [Item 7](#) (clients), [Item 13](#) (account monitoring) and [Item 16](#) (discretionary authority).

Item 3: What fees will I pay?

Ask your financial professional:

“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?”

We charge an annual advisory fee that is based on a percentage of the value of the assets under management, payable on a quarterly basis. The more assets there are in your account, the more you will pay in fees. Stonegate therefore may have an incentive to encourage you to increase the assets in your account.

Fees for financial planning services, for some clients, are typically included as part of the annual advisory fee.

In addition to our fees, you will be responsible for other fees and expenses associated with the investment of your assets. These fees and expenses could potentially include brokerage and other transaction costs, fees, and taxes related to the purchase and sale of securities for your accounts, and any fees charged by custodians for holding your assets. Certain investments we select for clients that are managed or sponsored by third parties, such as mutual funds, private funds, ETFs, and SMAs incur separate fees and expenses for their management and operation that are not included in our fees. Certain client portfolios that are invested in mutual fund share classes are charged a distribution fee (known as a "12b-1 fee") by the custodian. For additional information, please refer to Item 5 of our ADV Part 2A Brochure.

If you are engaged in our wrap fee program, the asset-based fees will include most securities transaction fees and fees to a broker-dealer that has custody of your assets, and therefore you will have a higher asset-based advisory fee.

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.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

Ask your financial professional: "How might your conflicts of interest affect me, and how will you address them?"

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

We receive certain benefits from the custodians we recommend to hold your account assets, such as pricing information and market data, computer software, and other technology that provide access to client account data, and related support. The software and support are not provided in connection with securities transactions of clients. Such software and related systems support may benefit Stonegate but not our clients directly. In evaluating whether to recommend that clients custody their assets at the custodians, we may consider the availability of some of the products, services and other arrangements as part of the total mix of factors we consider and not solely the nature, cost or quality of custody and brokerage services provided by such custodians.

For additional information, please refer to Item 12 of Stonegate's ADV 2A Brochure.

How do your financial professionals make money?

Our financial professionals are compensated based on the revenue generated from advisory services, which is distributed in accordance with an agreement entered into with the firm or among the owners of the firm. Some of our financial professionals are paid a salary and a bonus based on the revenue generated from the advisory services they perform. Thus, our financial professionals have an incentive to encourage you to increase the assets in your account or solicit new business.

For additional information please refer to Item 5 of your financial professional's ADV Part 2B Brochure Supplement.

Item 4: Do you or your financial professionals have legal or disciplinary history?

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

No. For additional information, please visit www.investor.gov/CRS for a free and simple search tool to research Stonegate and our financial professionals.

Item 5: Additional Information

Ask your financial professional: "Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?"

For additional information about Stonegate's investment advisory services and to request a copy of Form ADV 2A Disclosure Brochure please contact us at 205-963-0840.