



Client Relationship Summary

February 24, 2021

Sturbridge Capital, LLC (“we” or “us”) is registered with the Securities and Exchange Commission as an investment adviser. Investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

Our Firm offers investment advisory services to retail investors. We invest client assets in stocks and bonds. Some clients prefer diversified ETFs and others prefer individual securities. We do not engage in speculative activities, nor do we provide financial planning services. We monitor client accounts on a monthly basis but do not provide formal performance reporting. We have discretionary authority on most client accounts; any limitation on our authority is included in the investment management agreement. There are no minimum account size requirements.

For more information about our services, please refer to Items 4 and 5 of our Form ADV, Part 2A (the “Brochure”):

<https://adviserinfo.sec.gov/firm/summary/160327>

What to ask us:

- 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?

What fees will I pay?

Our Firm charges fees on a case by case basis. Employees of the firm and relatives of employees are not assessed any fees for investment advisory services provided. All client accounts are held at third party custodians that charge brokerage fees, margin interest, and other miscellaneous expenses that are common for brokerage firms that trade in liquid securities. Clients that invest in ETFs pay management fees to the ETF provider.

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.

For more detailed information about our fees and costs, please refer to Item 5 of the Brochure: <https://adviserinfo.sec.gov/firm/summary/160327>

What to ask us:

- 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 acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

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

If you are a client that is charged a management fee for our services, our compensation is relatively fixed while your returns are more variable. As a result, we may not recommend options that generate the highest return and we may recommend options that are the most expedient (i.e. require less of our time) such as diversified ETFs instead of investing in individual securities.

For information about our conflicts of interest, please refer to Item 10 of the Brochure: <https://adviserinfo.sec.gov/firm/summary/160327>

What to ask us:

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

How do your financial professionals make money?

Our financial professionals are paid a salary and discretionary bonuses based on their individual contributions. Financial professionals are not compensated based on the amount of client assets they service; the time and complexity required to meet the client’s needs; the product sold (i.e., differential compensation); product sales or commissions; or revenue the firm earns from the professional’s advisory services or recommendations.

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

No, neither we nor our financial professionals have a legal or disciplinary history. Please visit Investor.gov/CRS, for a free and simple search tool to research us and our financial professionals.

What to ask us:

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

Additional information about our Firm and services can be accessed on our website at www.sturbridgecapital.com and in the Brochure.

To request a copy of this document or any other disclosure documents referenced herein, please contact us at 248-220-8400.

What to ask us:

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