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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

OUR LAST BROCHURE WAS DATED MARCH 28, 2018. THERE HAVE BEEN NO MATERIAL CHANGES OF SIGNIFICANCE TO THAT DOCUMENT.

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 principal owner and President of Sage Rutty is Mr. Wayne F. Holly.

Types of Services we offer

Sage Rutty provides advisory services through various platforms.

- 1. 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.
- 2. QRP** - Under the QRP (formerly SIP) advisory service platform, Sage Rutty 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. However, implementation of investment recommendations made by Sage Rutty advisory representatives is at the discretion of the participant client and is executed through the qualified plan program.
- 3. Wrap Fee Programs** - Under this program, Sage Rutty has approved Wrap fee programs sponsored by First Clearing, LLC¹, SEI Investment Management Corp. and AssetMark, Inc.

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 six (6) 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 plan participant clients to develop investment strategies and recommendations for plan participants based on their particular financial situation, investment objectives and needs. However, implementation of investment recommendations made by Sage Rutty Financial Advisors is at the discretion of the participant client and is executed through the qualified plan program.

Wrap Fee Programs

Under the wrap fee program, SRC has approved the use of the following advisory programs: Wells Fargo Advisors, SEI Investment Management Corp., and AssetMark, Inc. After an evaluation of your individual situation and objectives, your Financial Advisor will work with you to select the wrap program that best suits your needs.

When you participate in a wrap program, your net fees generally include management fees, performance 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.

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.

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.

Diversified Managed Allocations – DMA

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. DMA offers the combination of investment strategies from various investment managers, mutual funds and exchange-traded funds (ETFs) on a single wealth management platform.

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.

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.

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.

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.

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.

Client Assets Managed by Us

	U.S. Dollar Amount	Total Number of Accounts
Discretionary	\$ 40,783,701	133
Non-Discretionary	\$1,046,121,455	4,092
Total	\$1,086,905,156	4,225

As of 12/31/2018

FEES AND COMPENSATION

Financial Planning Department fees

Foundation	\$ 750.00
Retirement	\$ 750.00
Social Security	\$ 250.00
Risk Management	\$ 750.00
Estate Planning	\$ 750.00
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 your wrap account (see "C" below.) Fees for accounts may be adjusted for multiple accounts.

FundSource® CustomChoice® Program Fees

Minimum Account Size \$25,000

(FundSource FoundationsSM \$10,000 minimum)

STANDARD FEE

Fee Schedule	2.00%
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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

Multi-Asset \$50,000

Individual Strategies – Current Equity Income \$50,000

Aggressive Growth \$150,000

Moderate Growth, Conservative Growth, Growth & Income \$250,000

Fee Schedule	Standard Fee
	2.25%

Beginning May 1, 2018 new accounts will be opened through the Masters Program

Diversified Managed Allocations “DMA” Program Fees

Minimum Account Size \$100,000 (Optimal Blends \$250,000)

Fee Schedule	Standard Fee
	2.55%

Masters Program Fees

Minimum Account Size \$100,000

Fee Schedule	Standard Fee
	2.50%

Allocation Advisors Program Fees

Minimum Account Size \$25,000

Fee Schedule	Standard Fee
	2.25%

Pathways Program Fees

Minimum Account Size \$25,000

Fee Schedule	Standard Fee
	2.00%

Private investment management “PIM®” Programs 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

PRIVATE ADVISOR NETWORK PROGRAM FEES

Minimum Account Size \$100,000

You have the choice of compensating Sage, Ruddy one of two ways for Network services:

Fee Schedule— You pay a fee for both Network services and execution services, with no separate charge being imposed by us for brokerage commissions on agency trades or markups or markdowns on principal transactions. Billed quarterly in advance, the Private Advisor Network fee schedule is negotiable based on the following schedule:

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

Execution Schedule - You pay for Network services by paying commissions for each transaction in the account at our normal commission rate for such agency transactions and at the normal markup or markdown imposed on client accounts for principal transactions. You will also be subject to any other fees associated with our standard brokerage accounts, including postage and handling fees, transfer taxes, exchange fees (among which SEC fees may be included), and any other fees required by law.

Neither the Execution Schedule nor Fee Schedule includes the investment adviser fees of the third-party investment manager. You pay for the services of the investment adviser separately. You authorize us to pay the separate investment advisory management fee invoiced by the adviser by debiting the client account accordingly. It is your responsibility to determine if any such invoice from the investment adviser is proper or if the amount of fees charged is accurate. You may revoke Introducing Firms authorization to pay the investment adviser fee at any time by written notice.

SEI INVESTMENT MANAGEMENT CORP. (SEI) PROGRAM FEES

SEI accounts are charged an all-inclusive fee on eligible assets that covers advisor, 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

ORP Program Fees

Account Value Fees	.05% - 1.00% of account value
Annual Minimum Fee	\$250 to \$1,000
Annual Maximum Fee	\$1,000 to \$2,500

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 Rutty & 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 calculated at the rate indicated in the Fee Schedule for that program from your account, in advance (or arrears in the case of SEI). For the purposes of calculating program fees, "total account value" shall mean the sum of the long and short market 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 periods and shall be calculated on the value of the account on the last business day of the prior calendar quarter.

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 Rutty & 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 Ruttly & 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, Ruttly 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. 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.

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 client: 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. Neither Sage Rutty & Co., Inc. nor any of its managing principals have any events or disclosure to make.

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

At the present time we have no current arrangements in effect.

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 AssetMark, Inc.

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 at 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 research or 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. When our affiliate cannot provide best execution, we will direct your trade elsewhere for execution services. 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.

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. 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 AssetMark Inc.. 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 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.)

Our Financial Condition

We do not have any financial condition that could reasonably be expected to impair our financial commitment to our clients.



Winsome Carter

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Winsome Carter 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 Winsome Carter is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Carter – Winsome’s career in the financial services industry began in 1993 as a Financial Advisor at Morgan Stanley/Dean Witter and she joined Sage Ruty in early 2008. Winsome holds a Bachelor of Business Administration from Baruch College of the City University of New York, and a Master of Business Administration from the Bittner School of Business at St. John Fisher College. Winsome is active in the charitable community participating on the Finance Committee of the Sojourner House/Wilson Community Center Board and on the Loan Committee of Pathstone Enterprise Center. She was born in 1947.

Disciplinary Information

Ms. Carter has no legal or disciplinary events to disclose

Other Business Activities

Ms. Carter is not involved in any business activities outside of Sage Ruty.

Additional Compensation

Ms. Carter does not receive any additional compensation bonuses based upon her sales, referrals or new accounts.

Supervision

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



James G. Criticos

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about James Criticos 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 James Criticos is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

James Criticos –James has been a Financial Advisor in the Rochester investment community since 1980 and joined Sage Ruty in 2002. He graduated from Lycoming College in Williamsport, Pennsylvania with a degree in Business Administration. He was born in 1948.

Disciplinary Information

Mr. Criticos has no legal or disciplinary events to disclose

Other Business Activities

Mr. Criticos is not involved in any business activities outside of Sage Ruty.

Additional Compensation

Mr. Criticos does not receive any additional compensation bonuses based upon his sales, referrals or new accounts.

Supervision

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



Kristin M. Dowejko

Sage Ruty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Kristin Dowejko 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 rlowwater@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 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 her sales, 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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Parker Burke Group

Douglas E. Parker, CFP®, AIF®

James P. Burke, CFP®, AIF®

Craig D. Gingerich, CFP®, AIF®

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Douglas E. Parker, CFP®, AIF®, James P. Burke, CFP®, AIF® and Craig D. Gingerich, 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 Douglas E. Parker, CFP®, AIF®, James P. Burke, CFP®, AIF® and Craig D. Gingerich, CFP®, AIF® 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 his sales, 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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.

James P. Burke, CFP®, AIF®

Educational Background and Business Experience

Mr. Burke – Jim, joined Sage Rutty 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 Rutty & Co., Inc.

Additional Compensation

Mr. Burke does not receive any additional compensation bonuses based upon his sales, 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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, 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 his sales, 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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Laura J. Parker

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Laura J. Parker 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 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 her sales, 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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



The Ogden Group

Randell Ogden

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Randell Ogden 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 Randell Ogden is available on the SEC's website at www.adviserinfo.sec.gov.

Randell Ogden

Educational Background and Business Experience

Mr. Ogden - Randy began his career in the banking business in 1984. He was an integral part of a team that was responsible for packaging and selling mortgage loans on the secondary mortgage market. Randy left the banking business in 1989 to pursue a career in the financial services industry. He first became licensed in the securities industry in 1990 and at that time worked primarily with businesses in the areas of pension and retirement planning and business succession. He joined Sage Rutty and company in 1997 and works with both businesses and individuals. His practice is focused on all areas of financial planning as well as money management. He holds the following securities licenses: Series 6, 7, 63, 65. He is also licensed to sell life and health insurance (including Long Term Health Care) in the state of NY. He is recognized by Sage Rutty and Co., Inc. as a Senior Vice President based on his professionalism, longevity and commitment to client service. He graduated from Corning Community College in 1983 with an AAS degree in Computer Science. He was born in 1963.

Disciplinary Information

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

Other Business Activities

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

Additional Compensation

Mr. Ogden does not receive any additional compensation bonuses based upon his sales, referrals or new accounts.

Supervision

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



Zachary T. Armstrong, CFP®

Sage Rutty & Co., Inc.

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

March 25, 2019

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® is a Financial Advisor with The Ogden Financial Group at Sage Ruddy. He 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 his sales, 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. Wayne Holly, President of Sage Ruddy & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Connor B. Holly, CFP®

Sage Rutty & Co., Inc.

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

March 25, 2019

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 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 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 his sales, 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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Katrina M. Smith, CFP®

Sage Ruty & Co., Inc.

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

March 25, 2019

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 her referrals or new accounts. Katrina may receive a bonus based upon meeting certain production goals.

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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Ryleigh M. Mattle, MBA

Sage Rutty & Co., Inc.

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

March 25, 2019

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 is licensed in NYS Life, Accident & Health insurance, holds her Series 7 & 66 licenses with the Financial Industry Regulatory Authority (FINRA) and performs as a notary public.

Disciplinary Information

Ms. Mattle has no legal or disciplinary events to disclose

Other Business Activities

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

Additional Compensation

Ms. Mattle does not receive any additional compensation bonuses based upon her sales, 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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



David DeWind

Sage Rutty & Co., Inc.

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

March 25, 2019

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 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 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 Bachelors 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 his sales, 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. Wayne Holly, President of Sage Ritty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Curt Ehrlich

Sage Rutty & Co., Inc.

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

March 25, 2019

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 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 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 his sales, 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. Wayne Holly, President of Sage Ruttly & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Victoria C. Ferren CFP®

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Victoria C. Ferren 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 Victoria C. Ferren CFP® is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Ferren – Victoria has in excess of 40 years of experience in the financial arena with expertise in trusts and estates, not-for-profits, charitable gifting, income tax, wealth management and business continuity planning. Victoria has been with Sage Ruddy since 2005 as the Director of Financial Planning. Victoria, born in 1955, is a Certified Financial Planner™ practitioner, a graduate of the State University of New York College at Geneseo, and a Certified Corporate Paralegal through advanced studies at Adelphi University. Victoria earned her Certified Financial Planner™ designation in 1994. 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. She is securities, health and life insurance licensed and is a Trust Representative of National Advisors Trust Company. As Director of Financial Planning, Victoria is responsible for data integrity and plan design, cash and tax flow, risk management, estate planning, charitable gifting and business exit strategies. Victoria is a member of the Estate Planning Council of Rochester, the National Association of Tax Professionals, and the Financial Planning Association.

Disciplinary Information

Ms. Ferren has no legal or disciplinary events to disclose

Other Business Activities

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

Additional Compensation

Ms. Ferren is strictly salaried. She does not receive any compensation based upon sales, referrals or new accounts.

Supervision

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



Pina Formicola

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Pina Formicola 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 Pina Formicola is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Formicola began her career in the financial services industry in 1989 and joined Sage, Rutty in 2016. For the last 10 years she has specialized in advising retirement plan participants. There are two key principles employed in managing the risk. They are to preserve wealth and to accumulate wealth. Pina seeks to preserve wealth by raising cash in the early stages of a stock market decline and accumulate wealth by taking the cash raised and reinvesting it in stocks, mutual funds, and ETF's as the stock market moves back up. Pina uses Morningstar fundamental research to help identify what to buy; and Point & Figure Technical Analysis to identify when to buy and when to sell. There is nothing proprietary about the systems or methods employed. Pina has been a past Representative for the Dorsey Wright Technical Global Research Team. Her global affiliations included The International Monetary Fund of Singapore and The Singapore Stock Exchange. Pina provided technical guidance to Far East institutional & hedge fund managers.

Born in 1966, Pina is a licensed Financial Advisor, and also received the designation of Accredited Wealth Management AdvisorSM or AWMA[®] from the College for Financial Planning. Individuals who hold the AWMA[®] designation have completed a course of study encompassing wealth strategies, equity-based compensation plans, tax reduction alternatives, and asset protection alternatives. 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. Pina is licensed with the Financial Industry Regulatory Authority (FINRA) and the New York State Insurance Department. She graduated from Alfred State with an AAS degree in Business in 1987.

Disciplinary Information

Ms. Formicola has no legal or disciplinary events to disclose

Other Business Activities

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

Additional Compensation

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

Supervision

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



Caroline Hill

Sage Rutty & Co., Inc.

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

March 25, 2019

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 Rutty, 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. Caroline may receive a bonus based upon new recurring revenue assets.

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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Joseph J. Nacca

Sage Rutty & Co., Inc.

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

March 25, 2019

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 his sales, 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. Wayne Holly, President of Sage Ruty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Wayne Holly

Sage Rutty & Co., Inc.

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585-232-3760

March 25, 2019

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This brochure supplement provides information about Wayne Holly 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 Wayne Holly is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Mr. Holly is President and Chairman of Sage Ruttly & 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 his sales, 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 Ruttly & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Kim L. Nugent, CFP®

Sage Rutty & Co., Inc.

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

March 25, 2019

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 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 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 Ruttly 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 her sales, 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. Wayne Holly, President of Sage Ruttly & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Christine M. Palmiere, RICP®

Sage Rutty & Co., Inc.

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585-232-3760

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about

Christine M. Palmiere, RICP®

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 Christine M. Palmiere, RICP® available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Chris Palmiere is a Financial Advisor with Sage Rutty & Company. Chris is a Retirement Income Certified Professional (RICP®). The RICP® is an advanced professional designation from The American College for financial professionals that advise clients in the retirement phase of life. She employs a comprehensive, client-focused approach to financial planning. Her practice is focused on getting to know her clients, their financial goals and preferences, followed by implementing and guiding each along their personal financial path. Chris, born in 1956, strongly believes providing quality advice about a client's finances requires a comprehensive approach. Managing investments must include considering a client's tax strategy, risk tolerances and time horizons. With a client-focused, comprehensive plan in place and reviewed regularly, Chris strives each day, working one on one with her clients, to help them pursue their goals. Chris began her career in the financial industry in 1996 and offers assistance in retirement planning, risk management, portfolio development and estate planning.

Disciplinary Information

Ms. Palmiere has no legal or disciplinary events to disclose

Other Business Activities

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

Additional Compensation

Ms. Palmiere does not receive any additional compensation bonuses based upon her sales, referrals or new accounts.

Supervision

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



Brennan Redmond, CFA, CFP®

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

**This brochure supplement provides information about
Brennan Redmond, CFA, CFP®
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Officer at rlohwater@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. Brennan may receive a bonus based upon new recurring revenue assets.

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. Wayne Holly, President of Sage Rutty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



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

Sage Rutty & Co., Inc.
100 Corporate Woods, Suite 300 Rochester, New York 14623
585-232-3760

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

**This brochure supplement provides information about
Neil S. Frood, JD, and Laura S. Frood, 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 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 Neil S. Frood, JD, and
Laura S. Frood, 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 Ruty & Company, Neil practiced law at one of the oldest law firms in Rochester in the areas of estate and gift taxation. Neil joined Sage Ruty in 2001 as a member of the Sage Advisors Team at Sage Ruty. 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

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

Other Business Activities

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 is also involved with some other outside activities, none of which are related to his employment with Sage Ruty.

Additional Compensation

Mr. Frood does not receive any additional compensation bonuses based upon his sales, 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. Wayne Holly, President of Sage Ruty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.

Laura S. Frood, AAMS®

Educational Background and Business Experience

Ms. Laura Frood, 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 Ruty as a member of the Sage Advisors Team. Laura has been awarded the Accredited Asset Management Specialist SM Designation; in order to use this designation Laura had to pass a thorough examination, as well as agree to comply with the College for Financial Planning Code of Ethics. The AAMS® designation also 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

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

Other Business Activities

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

Additional Compensation

Ms. Frood does not receive any additional compensation bonuses based upon her sales, 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. Wayne Holly, President of Sage Ruty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Sandra J. Wehner, CFP®

Sage Rutty & Co., Inc.

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

March 25, 2019

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about

Sandra J. Wehner, 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 Sandra J. Wehner, CFP® available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Ms. Wehner began her career in the financial services industry in 1981 with the Investment Department of Chase Manhattan Bank (f/k/a Lincoln Rochester Trust). In 1991 she began working for Sage Rutty & Co., Inc. Born in 1960, Sandy is a Corporate Vice President of Sage, Rutty, a licensed Financial Adviser and became a CFP® practitioner in January 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.

Disciplinary Information

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

Other Business Activities

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

Additional Compensation

Ms. Wehner does not receive any additional compensation bonuses based upon her sales, referrals or new accounts.

Supervision

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



David Swain

Sage Rutty & Co., Inc.

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

March 25, 2019

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 Ruty. 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 Ruty 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 Ruty & Co., Inc.

Additional Compensation

Mr. Swain does not receive any additional compensation bonuses based upon his sales, 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. Wayne Holly, President of Sage Ruty & Co., Inc, who may be reached at (585) 232-3760, performs those reviews.



Aaron Young, CFP®, AIF®

Sage Rutty & Co., Inc.

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

March 25, 2019

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 Rutty & 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 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. 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 Rutty & 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.