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CUSTOMER RELATIONSHIP SUMMARY (CRS)

Introduction

Stratigraphic Asset Management, Inc. is an investment adviser registered with the Securities and Exchange Commission. Investment advisory and brokerage services and fees differ and it is important for you to understand these differences.

Free and simple tools are available to individual investors, research firms and financial professionals at <https://www.investor.gov/crs>, which also provides educational materials about broker-dealers, investment advisers and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors. We typically manage investments in publicly traded bonds and common stocks based on your particular circumstances, and monitor them on an ongoing basis as part of our standard service. We do not offer financial planning services or insurance products.

We provide investment discretion for those services. If you invest with us on a discretionary basis, we will buy and sell investments in your accounts without requiring your pre-approval on an ongoing basis until you notify us in writing to terminate the agreement.

We do not offer advice with respect to any proprietary products. We typically offer advice regarding publicly traded securities such as U.S. and foreign common stocks, covered options positions, corporate debt securities, commercial paper, certificates of deposit, municipal securities and exchange traded fund shares.

Our minimum account size is \$1 million, however we make exceptions, typically for family members of larger clients.

For additional information about our services, please review our Form ADV, Part 2A brochure, (Items 4 and 7) at: <http://www.stratigraphic.com/stratigraphic-adv-2021.htm> or <https://adviserinfo.sec.gov/firm/summary/107119>

Ask your financial professional:

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

What fees will I pay?

Our fees range between 1.25% per year for accounts less than \$2.5 million and 1% for larger accounts, and we calculate the fee charged in arrears based on the average end of month market value during each semi-annual billing period. Our minimum fee is \$10,000 per year, which could cause your fees to exceed the 1.25% rate if your account value ever goes below \$800,000. Our fees are negotiable.

We do not receive any fees other than our advisory fees described above. All other expenses you would pay, such as trading commissions, interest on loan balances, wire fees, etc., are assessed at cost and paid to unaffiliated third parties.

Additional Information. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments

over time. Please make sure you understand what fees and costs you are paying. For more detailed information about our fees and costs, please review our Form ADV, Part 2A brochure (specifically Items 5.A, 5.B, 5.C and 5.D) available at: <http://www.stratigraphic.com/stratigraphic-adv-2021.htm> or <https://adviserinfo.sec.gov/firm/summary/107119>

Ask your financial professional:

– Help me understand how these fees and costs might affect my investments. If I give you \$1,000,000 to invest, how much will go to fees and costs, and how much will be invested for me?

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

Each client executes an Investment Adviser Agreement with Stratigraphic that sets forth our obligations.

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

- Most times, our principals buy the same securities for their own accounts as for clients.
- The more assets there are in your investment account(s), the more fees you will pay, and we have an incentive to encourage you to increase the assets in your account(s). For example, recommending rollovers from retirement plan assets such as 401(k) accounts to an Individual Retirement Account (“IRA”) that is advised on by our firm can increase the amount of advisory fees you will pay.
- Arrangements with custodians of your assets also present a potential conflict of interest due to services that are beneficial to us when we recommend you use them to maintain custody of your financial assets.

Additional Information: More information about conflicts of interest are contained in the Stratigraphic Form ADV, Part 2A brochure, available at <http://www.stratigraphic.com/stratigraphic-adv-2021.htm> or <https://adviserinfo.sec.gov/firm/summary/107119>

How do your financial professionals make money?

Our two principals are the only financial professionals at our firm, and they are compensated from advisory fees they receive, therefore they have the opportunity to earn more when opening more accounts, increasing assets and investing in riskier investments, within each client’s risk tolerance, to increase overall performance.

Do you have legal or disciplinary history?

Our firm and our investment professionals have no disciplinary history. Visit <https://investor.gov/crs> for a free and simple search tool to research our firm and our financial professionals.

Ask your financial professional:

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

Additional information

You can find additional information about our services and request a copy of this relationship summary by visiting <http://www.stratigraphic.com>, mailing us at **Stratigraphic Asset Management, Inc., 804 Douglas Road, Suite 363, Coral Gables, FL 33134**, or calling us at 305-447-0300.

Ask your financial professional:

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