

Item 1 – Cover Page

St. Germain Investment Management, Inc.

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January 1, 2025

This Brochure provides information about the qualifications and business practices of St. Germain Investment Management, Inc. If you have any questions about the contents of this Brochure, please contact us at 413-733-5111. 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.

St. Germain Investment Management, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about St. Germain Investment Management, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

St. Germain Investments is required to disclose any material changes to this brochure. The following items have been updated since our most recent annual filing.

- In December of 2024 St. Germain Investment Management's affiliated broker-dealer, St. Germain Securities, Inc. withdrew its registration with the Financial Industry Regulatory Authority (FINRA). We have removed all references to this entity and to our relationship.

Item 3 – Table of Contents

Item 1 – Cover Page.....	i
Item 2 – Material Changes	ii
Item 3 – Table of Contents.....	iii
Item 4 – Advisory Business.....	1
Item 5 - Fees and Compensation.....	4
Item 6 – Performance-Based Fees and Side-By-Side Management.....	7
Item 7 – Types of Clients	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	7
Item 9 – Disciplinary Information	8
Item 10 – Other Financial Industry Activities and Affiliations.....	8
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	8
Item 12 – Brokerage Practices	9
Item 13 – Review of Accounts.....	14
Item 14 – Client Referrals and Other Compensation	14
Item 15 – Custody	17
Item 16 – Investment Discretion	18
Item 17 – Voting Client Securities	18
Item 18 – Financial Information.....	19
Brochure Supplement(s)	

Item 4 – Advisory Business

INTRODUCTION

St. Germain Investment Management, Inc. is a Massachusetts corporation, and is registered with the United States Securities and Exchange Commission (SEC) as an investment adviser under the Investment Advisers Act of 1940. St. Germain Investment Management, Inc. is a wholly owned subsidiary of D.J. St. Germain Co., Inc. St. Germain Investment Management, Inc. was incorporated in August of 2010, and succeeded the IA business of D.J. St. Germain Co., Inc., which was founded in 1924. October Mountain Financial Advisors, located in Lee, MA, is a d/b/a of St Germain Investment Management, Inc. In 2019, D.J. St Germain Co., Inc. acquired the assets of Gage-Wiley & Co., Inc. (established 1933), also known as New England Capital (NEC). New England Capital and Gage Wiley each operate as a d/b/a of St Germain Investment Management, Inc.

D.J. St. Germain Co., Inc. is the primary owner of St. Germain Investment Management, Inc. Officers include Michael Matty, as President, Timothy Suffish as Director, and John “Trey” Fortier as Treasurer.

Assets under management (as of December 31, 2023) are:

	<u>U.S. Dollar Amount</u>
Discretionary:	\$2,649,897,368
Non-Discretionary:	\$ 49,141,277
Total:	\$2,699,038,645

This Form ADV, Part II and narrative provides clients with information regarding St. Germain Investment Management, Inc. and its advisory services that should be considered before becoming a client of St. Germain Investment Management, Inc. This narrative also provides information about the qualifications and business practices of St. Germain Investment Management, Inc. The information in this narrative has not been approved or verified by the SEC or by any state securities authority.

Additional information about St. Germain Investment Management, Inc. is also available on the Internet at www.adviserinfo.sec.gov by accessing Part 1 of St. Germain Investment Management, Inc.'s Form ADV or by accessing the firm's Part 3 Customer Relationship Summary. You can search this site by a unique identifying number, known as a CRD number. The CRD number for St. Germain Investment Management, Inc. is 155186.

INVESTMENT MANAGEMENT SERVICES

St. Germain Investment Management, Inc. primarily provides discretionary investment management (portfolio management) services for individuals, businesses, non-profit charitable organizations, and institutional clients, as well as financial planning services.

Investment Management Process

Investment management services are based on each client's individual goals and circumstances. Our investment advisors and/or financial planners consult with individual clients to help identify a specific investment strategy that aligns with each client's financial profile and long-term goals, and will take into consideration a client's personal financial circumstances, investment objectives, cash flow needs, liquidity requirements, investment time horizon, and risk profile.

Investment strategies are typically incorporated into a model portfolio format, which targets a range of asset allocation and security selection models created to achieve primary investment objectives, including long-term growth, growth and income, balanced, equity income, income, and others. Individual client portfolios may have variances from models based on individualized circumstances, risk profile, client restrictions, tax considerations, or the timing of when the account is established.

Both quantitative and qualitative criteria are utilized in determining asset allocation and security selection decisions, and ongoing oversight of each portfolio. Asset allocation and/or security selections will be adjusted from time to time in order to better achieve the intended investment objectives of each portfolio.

St. Germain Investment Management, Inc.'s portfolio management services are organized and made available to clients in the following ways:

Separately Managed Accounts (SMA)

These accounts are actively managed, diversified portfolios of individual securities constructed in a manner consistent with the investment objectives of the client. Portfolio holdings may include common stocks, securities convertible into common stocks, preferred stocks, corporate debt obligations, municipal bonds, United States Government or agency bonds. Exchange traded funds (ETFs) and no-load or load-waived mutual funds, foreign and domestic, may be used for efficiency and diversification purposes when suitable. Stock options, variable annuities, or other assets not listed may be used by agreement and approval of the Advisor and the client.

Portfolios are managed on a discretionary basis. Asset allocation and individual security selection decisions are made as determined to be consistent with client investment objectives. These portfolios are typically reserved for accounts with a minimum of \$250,000.

Mutual Fund/ETF Managed Portfolios

These are diversified portfolios of no-load or load-waived mutual funds and exchange traded funds (ETFs) constructed in a manner consistent with the investment objectives of the client. Portfolio positions may include actively managed or passive index funds, domestic and foreign. Investment theme or sector-specific funds may be used, including funds that fall into the category of “ESG” investing, which integrate Environmental, Social, and Governance factors into the investment process and decision making. ESG investing is a term often used interchangeably with “SRI” (Socially Responsible) and Sustainable Investing. In certain circumstances portfolio positions may also include individual securities listed under SMA (above), subject to approval of St Germain Investment Management, Inc. and suitability with the client profile and investment objectives.

Portfolios are managed on a discretionary basis, with asset allocation and/or fund selection decisions made as determined to be consistent with client investment objectives. These portfolios are typically reserved for accounts of \$100,000 or more.

Wrap Fee Advisory Programs

Wrap Fee Accounts are investment accounts where a single “wrapped” fee covers all management, brokerage, and administrative expenses. It should be noted that this fee does *not* include fees and expenses that represent the imbedded *internal* costs of mutual funds or exchange traded funds that may be held in the portfolio.

St. Germain Investment Management, Inc. does not directly sponsor or manage wrap fee accounts, but may provide them to our clients on an exception basis through a service agreement we hold with Charles Schwab. As discussed in Item 14 below, St. Germain Investment Management receives revenue from these providers pursuant to these arrangements, posing a conflict of interest. Based upon a review of a client’s financial profile, investment objectives, and risk tolerance, along with other pertinent information, St Germain Investment Management, Inc. identifies an appropriate asset allocation and investment management strategy suitable for the client, and then matches that strategy with a wrap fee program suitable to the client’s investment objective. St. Germain Investment Management, Inc. evaluates and monitors the wrap fee program to ensure compliance and consistency with the client’s objectives.

Specific wrap fee programs available from the wrap fee sponsors vary in scope, strategy, and costs, and require a separate application process that is specific to each program. St. Germain Investment Management, Inc. guides clients through the application process, and provides clients with all necessary information and disclosures related to the wrap program, including full disclosure related to all fees, investments risks, and suitability.

St. Germain Investment Management, Inc. offers access to wrap fee accounts to clients

who prefer the wrap fee structure, or to provide access to investment strategies that are otherwise unavailable through our in-house offerings. Minimum account size is \$100,000.

Financial Planning

Through personal discussions in which goals and objectives based on a client's particular circumstances are established, St. Germain Investment Management, Inc. may develop a customized financial plan for clients, in addition to managing their investment portfolio. Working collaboratively with clients, we provide guidance in establishing clearly defined personal financial objectives, and specific strategies for achieving those goals. Areas addressed in the financial planning process are those most relevant to the individual client, and may include areas such as budgeting and cash flow planning, asset and liability assessments, retirement planning, Social Security, pension and retirement income strategies, debt management, tax planning, risk management and insurance, long term care, estate planning, philanthropic strategies, investment analysis and portfolio reviews.

We encourage clients to work closely with their attorney, accountant and other appropriate advisors as needed. Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All investment recommendations are generic in nature, but tailored to client needs determined by the financial plan.

St. Germain Investment Management, Inc. may provide additional general business and securities consulting services to clients as part of its financial planning services. These services may include, but are not limited to, advice on business planning, business successions and mergers, insurance needs, coordination of the structures of business plans and companies, meetings with client lawyers to assist with estate planning and accountants to assist with tax planning.

Fees for Financial Planning services are typically covered by our management fees. We reserve the right to charge separately for such services as conditions may warrant.

Item 5 – Fees and Compensation

St. Germain Investment Management, Inc.'s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investments and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are

disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to St. Germain Investment Management, Inc.'s fee.

Fees

The annual fee for Investment Services will be charged as a percentage of client assets under management, billed quarterly in arrears. The basic fee schedule per account is as follows:

Assets under Management [AUM]	Annual Fee
First \$250,000	1.25%
Next \$1,750,000	1.00%
Next \$3,000,000	0.85%
Amounts over \$5,000,000	0.60%

Although St Germain Investment Management, Inc. has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee or fee schedule. These include the complexity of the client assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, and reporting among other factors. The specific annual fee or fee schedule is identified in the contract between the adviser and each client, and will not exceed 1.25%. A minimum quarterly management fee of \$25 applies (prorated monthly).

Some existing client fees fall outside of our basic fee schedule, based on prior negotiated arrangements. Fees agreed upon by New England Capital with its existing clients prior to its December 2019 merger with St Germain Investment Management Inc. will be honored, and will not exceed 1.25%.

Generally, St. Germain Investment Management, Inc. deducts its management fee directly from client accounts. Some clients, at the client's request, are invoiced directly. Billing is in arrears, on a quarterly basis, based on the average daily account balance at the close of the billing period. In order to arrive at this daily account balance, the firm uses pricing provided by its custodian, Charles Schwab. Charles Schwab has its own method for pricing certain securities such as bonds. Clients are not required to pay any fees in advance. New accounts will be charged pro rata from the date of opening. The fee for terminated accounts will be pro rata for the time they remained with St Germain Investment Management, Inc.

Other Fees and Separate Mutual Fund Fees

All fees paid to St. Germain Investment Management, Inc. for investment advisory services are separate and distinct from the fees and expenses charged to their shareholders by mutual funds, closed-end funds, or exchanged-traded funds that may be held in client portfolios.

It is standard policy that St. Germain Investment Management, Inc. will not invest client assets in mutual funds that have 12b-1 fees. However, if a client holds a pre-existing mutual fund position(s) that is transferred to our management, and if it is determined to be in the clients' best interest to retain that position, we make our best effort to exchange that fund into a non-12b-1 share class if the fund company offers it, and if it is available through the custodian. In situations where a 12b-1 fee is charged by the mutual fund company, St. Germain Investment Management does not receive that fee.

In some cases, we have clients that originated as traditional (commission-based) brokerage accounts that hold mutual funds with 12b-1 fees, and the client subsequently transitioned to (fee-based) investment advisory services. If after review and agreement with the client it is determined that no change be made to that mutual fund position, we segregate those positions as "unsupervised assets" for billing purposes, and no management fees will be charged against those assets. In these circumstances, St Germain Investment Management, Inc. does not hold supervisory responsibility for those assets, and does not exercise discretionary management.

In some cases, St. Germain Investment Management, Inc. is asked to arrange "custody" for a client's account in which there is little or no trading of securities, and/or no fee-based active management of the account. In these situations, and by agreement with the client, St. Germain Investment Management, Inc. charges a servicing fee ranging from zero to 25 basis points, depending on total client assets.

General Information on Fees

In certain circumstances, fees can be negotiable. Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees. St. Germain Investment Management, Inc. will establish fee relationships with each client at the start of the advisory relationship.

Item 6 – Performance-Based Fees and Side-By-Side Management

St. Germain Investment Management, Inc. does not charge any performance-based fees (fees based on a share of capital gains on, or capital appreciation of, the assets of a client).

Item 7 – Types of Clients

St. Germain Investment Management, Inc. provides portfolio management services to individuals (other than high net worth individuals), high net worth individuals, pension and profit sharing plans (other than plan participants), charitable organizations, and corporations or other businesses. Generally, St Germain Investment Management, Inc. will open accounts with assets over \$100k. The account minimum is negotiable depending on other factors such as other assets under management, accounts that can be linked, or potential future investment.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

St. Germain Investment Management, Inc. analysis methods incorporate macro-economic, sector, industry assessments, and fundamental and technical analysis of broad financial markets as well as individual portfolio holdings. We typically offer investment advice on any pre-existing investments held by clients at the start of the advisory relationship. St. Germain Investment Management, Inc. emphasizes the identification of an appropriate risk tolerance and asset allocation. St. Germain Investment Management, Inc.'s investment management strategies do not attempt to manage short-term market fluctuations and emphasize a long-term approach to investing.

Client accounts may be divided among different investment management strategies based upon individual financial circumstances, goals, and risk tolerances. Assets may be diversified among stocks, bonds, and cash or cash alternatives, in the form of either individual securities or through investments in mutual funds or ETFs (exchange traded funds). Each asset class contains inherent risk. For stocks and bonds, individual security values may fluctuate based upon the overall economy, market conditions, investor confidence, and specific corporate events. Mutual funds and ETFs contain similar risks as stocks and bonds, but are also subject to risks specific to the fund management company or the influence of the collective behavior of fund shareholders.

Investing in securities involves the risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of St. Germain Investment Management, Inc. or the integrity of St. Germain Investment Management, Inc.'s management.

In July of 2021, St. Germain Investment Management entered into a settlement with the Securities Exchange Commission involving the firm's specified disclosure of a conflict of interest arising from the participation of the firm's affiliated broker dealer in a cash sweep

revenue sharing agreement. Per the terms of the settlement, the firm agreed to pay disgorgement, prejudgment interest and a civil penalty totaling \$1,925,250. The firm has determined to avoid any further conflicts of interest, it will no longer participate in such arrangements. Additional information regarding this settlement can be found in the firm's Form ADV Part 1 available at adviserinfo.sec.gov or upon request.

Item 10 – Other Financial Industry Activities and Affiliations

St. Germain Investment Management, Inc. is a wholly owned subsidiary of D.J. St. Germain Co., Inc.

St. Germain Investment Management, Inc.'s advisory personnel and employees endeavor at all times to put the interest of their clients first as part of our fiduciary duty as registered investment advisers.

Generally, the firm works with an outside vendor (DPL) to process insurance transactions on behalf of our clients. However, some advisory personnel of our firm, in their individual capacities, are licensed insurance agents. In the event that a client purchases an insurance product from one of our licensed agents rather than through our relationship with DPL, D.J. St. Germain Co., Inc. receives separate, yet customary commission compensation for processing an insurance transaction. The receipt of such compensation poses a conflict of interest in that the firm has a financial interest in selling the insurance product to the client even if coverage may be obtained elsewhere at a lower cost. Should such circumstances occur, this will be fully disclosed to the client. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client. No portion of this commission revenue is paid, or considered compensation directly or indirectly, to any advisor or other employee of St Germain Investment Management or any other St Germain affiliate. Moreover, as set forth in the firm's Code of Ethics (see below), it is the policy of St. Germain Investment Management that no person employed by the firm shall prefer his or her own interest to that of an advisory client.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

St. Germain Investment Management, Inc. has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. St. Germain Investment Management, Inc.'s Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and sets forth St. Germain Investment Management, Inc.'s practice of supervising the personal securities transactions of supervised persons with access to client information. Individuals associated with St. Germain Investment Management, Inc. may buy or sell securities for

their personal accounts identical to or different than those recommended to clients, including being traded in identical strategies as clients within the firm's account, and be included in block trading for allocation pro-rata at an average price. It is St. Germain Investment Management, Inc.'s philosophy that because the firm and its employees trade in identical securities, included in block trades at the same price, that conflicts are avoided and clients are treated fairly. It is the expressed policy of St. Germain Investment Management, Inc. that no person employed by St. Germain Investment Management, Inc. shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on the investment decisions of advisory clients. The overriding principal is fairness to the client. All supervised persons at St. Germain Investment Management, Inc. must acknowledge the terms of the Code of Ethics annually, or as amended.

To supervise compliance with its Code of Ethics, St. Germain Investment Management, Inc. requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holdings reports and (minimally) quarterly transaction reports to the firm for review. St. Germain Investment Management, Inc. prohibits such access persons from investing in any IPOs, and requires approval from the Chief Compliance Officer prior to participation in private placements (limited offerings).

St. Germain Investment Management, Inc.'s Code of Ethics further includes the firm's policies prohibiting the use of material non-public information, governing the receipt of gifts, and the protection of confidential client information. St. Germain Investment Management, Inc. requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with St. Germain Investment Management, Inc.'s obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price.

St. Germain Investment Management, Inc. will provide a complete copy of its written Code of Ethics to any client upon request to St. Germain Investment Management, Inc.'s CCO at the main office address.

Item 12 – Brokerage Practices

St. Germain Investment Management, Inc.'s Management Agreement requires that clients provide us with written direction in determining Brokerage and Custody services.

Allocation

St. Germain Investment Management, Inc. will execute block trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple clients' accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading allows St. Germain Investment Management, Inc. to execute equity trades in a timelier, equitable manner and to reduce overall commission charges to clients.

After purchase or sale decisions have been made for individual securities, the trade may be aggregated for accounts with similar investment objectives. It is the firm's belief that such aggregation helps clients to obtain best execution for their trades.

Participation in Client Transactions

St. Germain Investment Management, Inc. and/or an affiliated entity, acting as principal, occasionally buys or sells securities directly from clients, posing a conflict of interest. This is done on an infrequent basis and is typically done as a convenience to clients (*e.g.*, purchasing an illiquid security from a client where no market is made). In the very limited circumstances in which we do act as principal, we do not charge a markup on the trade.

The Custodian and Brokers We Use

St. Germain Investment Management does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15-Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian.

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities as instructed by us. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this agreement are described below in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab, and we anticipate that most trades will be executed through Schwab, we can still use other brokers to execute trades for your account as described below (see Your brokerage and custody costs).

How we select brokers/custodians

We recommend Schwab, a custodian/broker, to hold your assets and execute transactions. When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

Your brokerage and custody costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, certain mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a minimum level of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other

compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”). By using another broker or dealer you may pay lower transaction costs.

Products and services available to us from Schwab

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Schwab’s support services:

Services that benefit you. Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

Services that do not directly benefit you. Schwab also makes available to us other products and services that benefit us but do not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts and operating our firm. They include investment research, both Schwab’s own and that of third parties. We use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)

- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and compliance related needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support
- Recruiting and custodial search consulting

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits, such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for those services from our own resources.

In choosing to refer our client to Schwab for custodial services, we conducted a review of Schwab as well as other custodians and their "platforms." Because we take seriously the recommendation to use Schwab for the services referred to in this brochure, we continue to regularly review our relationship with Schwab to ensure it continues to meet the needs of our clients. We further review the systems and services provided to our firm by Schwab to ensure these services and systems do not present a conflict that would cause our firm or its associates to place their own interest above the interests of our clients.

Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. Schwab has also agreed to pay for certain technology, research, marketing, and compliance consulting products and services on our behalf once the value of our clients' assets in accounts at Schwab reaches certain thresholds. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the

use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

Item 13 – Review of Accounts

Regular Reviews of Client Accounts and Reporting

Investment decisions are guided by members of the Investment Policy Committee. Accounts are continuously monitored based upon changes in economic and market conditions, individual security fluctuations, changes in company fundamentals, cash additions/withdrawals to client accounts, among other factors.

The custodians for our client accounts (Charles Schwab and Capital Group, LLC) provide clients with account statements, detailing individual holdings and market value. These custodians also mail (or provide electronically if available by the custodian and elected by the client) "confirmations" of security transactions (buys and sells) made in client accounts. Clients also receive other periodic market updates and commentaries provided by St Germain Investment Management, Inc.

In addition to regular account statements from the custodians, some advisory accounts also receive quarterly commentary and performance reporting provided by St. Germain Investment Management, Inc.

As a best practice, St Germain Investment Management, Inc. encourages all clients to schedule an annual review with their representative to address changing needs and/or material life changes.

Item 14 – Client Referrals and Other Compensation

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. In addition, Schwab has also agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Schwab reaches a certain size. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products

and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

Like other financial firms, St Germain Investment Management, Inc. has conflicts of interest. The information below describes conflicts of interest stemming from compensation received by our affiliated entities, as they relate to investment advisory accounts managed by St Germain Investment Management, Inc.

In some cases, outside advisors (non-employee, non-affiliated) may recommend St. Germain Investment Management, Inc. to clients and receive compensation for this referral, posing a conflict of interest. Any client entering into such a relationship will receive an Advisory Disclosure Statement from the referring party outlining fees. St Germain Investment Management, Inc. pays referral fees out of its investment management fees. Clients do not pay additional fees as a result of the referral fee paid to third parties by St Germain Investment Management, Inc.

The custodians of our client accounts offer so-called “sweep accounts,” in which the excess cash balances of your securities account are “swept” into an interest paying account on a daily basis. Available sweep options include bank deposit accounts that are insured by the Federal Deposit Insurance Corporation (FDIC). Clients select their sweep option in the account-opening document provided by the custodian. Unless instructed otherwise by the client, St Germain Investment Management Inc.’s default position is for the client to select the bank deposit sweep account option because it offers the greatest flexibility to quickly access cash reserves for the purchase of securities or withdrawal of funds to the client, there are no transaction charges for deposits and withdrawals, and for its FDIC coverage. Information regarding the calculation and payment of interest on cash balances, program banks participating in the bank sweep program, thresholds of FDIC insurance coverage, and other relevant information is fully disclosed in the account opening documents provided by the custodian.

Since St. Germain Securities, Inc. is an affiliated company of St. Germain Investment Management, Inc., and acts as the designated broker-dealer for customer accounts held at Pershing and First Clearing, clients should be aware that St. Germain Securities, Inc. holds a sweep account revenue sharing agreement with First Clearing. First Clearing will compensate St. Germain Securities, Inc. up to 50bps (.5% annualized) for balances held in sweep accounts in brokerage only, non-advisory accounts. Fees paid are based on the average daily balance of all St Germain Securities, Inc.’s client accounts in aggregate. Clients should recognize that the interest rate earned on cash balances in sweep accounts fluctuates with market factors, and that higher (or lower) returns may be available elsewhere, and that returns could be higher investing in bank deposits directly, or in other comparable interest bearing vehicles such as money market funds.

Revenue sharing from sweep accounts are only paid to St Germain Securities Inc., and not to St Germain Investment Management, Inc. No portion of any such fees collected by St Germain Securities, Inc. is paid, or considered compensation directly or indirectly, to any advisor or other employee of St Germain Securities, Inc. or any other St Germain affiliate. St Germain Securities, Inc. and St Germain Investment Management, Inc. do not have any revenue sharing agreements with client accounts held at Charles Schwab, and therefore do not receive any compensation related to client cash balances in those accounts.

St Germain Investment Management, Inc. does not use or recommend the use of margin as part of its investment strategies. However, there are occasional circumstances when individual clients have unexpected short term borrowing needs (such as bridge financing to purchase a new home until the old home is sold). After considering tax implications, costs, convenience, or other factors, the client may determine that borrowing against the collateral of a securities account we manage is their best option. In such cases, securities-based lending options are available to them through the account custodian. We do not actively solicit these transactions. However, if as a service we facilitate borrowing transactions for client accounts held at Pershing or First Clearing, clients should be aware that St. Germain Securities, Inc. has revenue sharing agreements with these custodians. These agreements pose a conflict of interest, in that St. Germain Securities has a financial incentive for clients to enter into lending arrangements with Pershing or First Clearing even if better terms may be available elsewhere. Compensation paid to St Germain Securities, Inc. is a mark-up from the base interest rate charged by the custodian; it is based on account size, loan balance, and the relationship and service requirements of the client, and ranges from 0 to 100bps (zero to 1% annualized). Interest charges vary with market conditions, as well as account size and borrowing need, and are fully disclosed by the custodian at time of transaction. Risks associated with pledging securities as collateral for borrowing is disclosed to clients by the lending custodian in the client account agreement, which requires client signatures. Revenue generated from securities-based lending is paid to St Germain Securities, Inc., not to St Germain Investment Management, Inc. No portion of any such fees collected by St Germain Securities, Inc. is paid to, or considered compensation directly or indirectly, to any advisor or other employee of St Germain Securities, Inc., or any other St Germain affiliate. St. Germain Securities Inc. and St Germain Investment Management, Inc. do not have securities-related lending revenue sharing agreements with client accounts held at Charles Schwab, and therefore do not receive any compensation related to client loan balances in those accounts.

As noted in Item 4 above, St. Germain Investment Management, Inc. receives revenue from Wells Fargo Advisors, LLC pursuant to wrap fee advisory arrangements, posing a conflict of interest in that we have a financial interest in providing wrap fee advisory services sponsored by this entity. No portion of this revenue is paid, or considered

compensation directly or indirectly, to any advisor or other employee of St. Germain Investment Management or any other St. Germain affiliate. Moreover, as set forth in the firm's Code of Ethics, it is the policy of St. Germain Investment Management that no person employed by the firm shall prefer his or her own interest to that of an advisory client.

Item 15 – Custody

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Schwab, Pershing, LLC, or First Clearing maintains actual custody of your assets. You will receive account statements directly from your custodian at least quarterly. They will be sent to the email or postal mailing address you provided to the custodian. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements with the periodic portfolio reports you will receive from us.

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts unless clients specifically request to be billed directly.

As part of this billing process, the client's qualified custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the qualified custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the qualified custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial account statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Accounts are held at one of our qualified custodians, Schwab, First Clearing, or Pershing. While these firms serve as the qualified custodian, our firm, for regulatory purposes does take custody in limited situations such as the ones listed below:

- With your authorization, the firm deducts fees directly from your account.
- The firm accepts standing instructions for delivery of funds and securities from your account.

- The firm may also, on occasion, accept a stock or other certificate or a check for deposit into your advisory account.
- In rare circumstances one of our Advisors may assume a control position within an account (such as Trustee or Power of Attorney).

Item 16 – Investment Discretion

St. Germain Investment Management, Inc. usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts, St. Germain Investment Management, Inc. observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment restrictions may be provided to St. Germain Investment Management, Inc. either verbally or in writing.

Brokerage Discretion

St Germain Securities, Inc., a FINRA registered Broker-Dealer and SIPC member, is an affiliate of the Adviser. As noted, trades in accounts held by clients who are both advisory and brokerage clients are executed through St. Germain Securities, our brokerage affiliate. As noted in Item 10 above, this poses a conflict of interest. For accounts held at Charles Schwab, all trades are executed through Charles Schwab.

Item 17 – Voting Client Securities

For client accounts using Pershing LLC as their custodian, St. Germain Investment Management, Inc. votes proxies on behalf of clients based on our assessment of the best economic interests of the clients.

For clients using Schwab as their custodian, clients are able to choose whether or not St. Germain will vote proxies on their behalf. Clients do not, by policy or agreement, direct St Germain Investment Management Inc.'s vote. Where clients choose for St. Germain to vote, proxies or other solicitations are received directly by St. Germain Investment Management Inc., who will generally vote in favor of routine corporate proposals. St. Germain Investment Management, Inc. has written policies regarding proxy voting. Clients may request information regarding how particular proxies were voted and may request a copy of these procedures by contacting, in writing, St. Germain Investment Management, Inc.

For client accounts held at First Clearing as their custodian, St. Germain Investment Management, Inc. does not vote proxies on behalf of these clients. This policy is disclosed in the Investment Management Agreement, which requires acknowledgement and signature of the client.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about St. Germain Investment Management, Inc.'s financial condition. St. Germain Investment Management, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Form ADV 2b Follows

January 1, 2025

Item 1 – Cover Page – Michael Matty

Michael R. Matty

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Michael R. Matty that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Michael R. Matty is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Michael Robert Matty, President

Year of Birth: 1963

Formal Education:

- Pennsylvania State University, BA Economics
- Pennsylvania State University, MA Economics

Business Background:

- St. Germain Securities, Inc., President & Director, 1999 – 2024
- Joined St. Germain Investment Management, President and Director in 1999

Professional Designations: CFA®, CFP®, ChFC®, AIF

CFA – Chartered Financial Analyst

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

ChFC – Chartered Financial Consultant

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

CFP – Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

AIF – Accredited Investment Fiduciary

The Accredited Investment Fiduciary (AIF®) Designation is a professional certification that demonstrates an advisor or other person serving as an investment fiduciary has met certain requirements to earn and maintain the credential. Attainment of the AIF Designation demonstrates understanding of the Prudent Practices® and methodology.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Michael R. Matty.

Item 4- Other Business Activities

Michael Matty does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Michael Matty does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm’s Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle’s phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm’s Code of Ethics and compliance manuals.

Item 1- Cover Page – Timothy Suffish

Timothy W. Suffish

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Timothy W. Suffish that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Timothy W. Suffish is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: **Timothy Wallace Suffish, Senior Vice President—Head of Equities**

Year of Birth: 1971

Formal Education:

- College of the Holy Cross, BA
- Northeastern University, MBA
- Northeastern University, MA in Accounting

Business Background:

- Bank North, Vice President 2001 - 2004
- St. Germain Securities, Inc., Head of Equities 2004 - 2024
- Joined St. Germain Investment Management, Senior Vice President, Head of Equities

Professional Designations: CFA®

CFA – Chartered Financial Analyst

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

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The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Timothy W. Suffish.

Item 4- Other Business Activities

Mr. Suffish does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Mr. Suffish does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Christine Andrzejewski

Christine M. Andrzejewski

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Christine M. Andrzejewski that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Christine M. Andrzejewski is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Christine M. Andrzejewski, Vice President-Financial Advisor and Head of Client Services

Year of Birth: 1974

Formal Education:

- University of Massachusetts/Amherst, BA in Social & Behavioral Science
- Holyoke Community College, AD

Business Background:

- St. Germain Securities, Inc., Head of Client Services 2010 - 2024
- Joined St. Germain Investment Management in 2010, Vice President, Financial Advisor, Head of Client Services

Professional Designations: Financial Para-planner Qualified Professional™

FPQP – Financial Paraplanner Qualified Professional

The **FPQP™ designation** is for those who want to start building a foundation in financial planning. The program covers the main facets in personal financial planning with a focus on practical application, such as estate, tax, retirement, insurance, and investments.

[Item 3- Disciplinary Information](#)

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Christine M. Andrzejewski.

[Item 4- Other Business Activities](#)

Christine Andrzejewski does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

[Item 5- Additional Compensation](#)

Christine Andrzejewski does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

[Item 6 - Supervision](#)

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121.

Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1 – Cover Page – Joshua Bedell

Joshua D. Bedell

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 584-9121

January 1, 2025

This Brochure Supplement provides information about Joshua D. Bedell that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Joshua D. Bedell is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Joshua D. Bedell, Financial Advisor

Year of Birth: 1980

Formal Education:

- Brooklyn College, NY—Masters in Education
- Hampshire College, MA—BA Liberal Arts

Business Background:

- Gage-Wiley & Co. Inc., Registered Representative 2010 – 2019
- New England Capital (a Gage Wiley affiliate), Investment Advisor, 2010 – 2019
- St. Germain Securities, Inc., Financial Advisor 2019 - 2024
- Joined St. Germain Investment Management in 2019, Vice President, Financial Advisor

Professional Designations: CIMA®, CFP®

CFP – Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

CIMA – Certified Investment Management Analyst

The Certified Investment Management Analyst (“CIMA”) certification is owned by Investments and Wealth Institute (“The Institute”). Use of the CIMA designation signifies that the user has successfully complete The Institute’s initial and ongoing credentialing requirements for investment management professionals and/or wealth advisors. Candidates must meet established eligibility requirements and completed all steps to earn the CIMA certification. Upon certification, certificants must satisfy ongoing renewal requirements. The CIMA professional is one who integrates investment knowledge with practical tools to meet the real-world needs of individual and institutional investors.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Joshua D. Bedell.

Item 4- Other Business Activities

Joshua D. Bedell does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Joshua D. Bedell does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Richard Bleser

Richard R. Bleser

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Richard R. Bleser that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Richard R. Bleser is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Richard R. Bleser, Vice President, Portfolio Manager

Year of Birth: 1981

Formal Education:

- University at Albany, SUNY, Financial Analysis and Economics, BS

Business Background:

- Berkshire Bank, Director of Research and Chief Investment Officer - 2010-2015
- St. Germain Securities, Inc., Portfolio Manager 2015 - 2024
- Joined St. Germain Investment Management, Inc. in 2015, Vice President, Portfolio Manager

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Richard R. Bleser.

Item 4- Other Business Activities

Richard R. Bleser does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Richard Bleser does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1 – Cover Page – Maurice Bowerman

Maurice Bowerman

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

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Additional information about Maurice Bowerman is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Maurice Bowerman, Financial Advisor, October Mountain Financial Advisors (a d/b/a of St. Germain Investment Management)

Year of Birth: 1965

Formal Education:

- Duquesne University, Pittsburgh, PA – Business Administration (Finance Concentration)

Business Background:

- NBT Bank, Trust Officer, 2023 2025
- Salisbury Bank & Trust, Trust Officer, 2015 – 2023
- First Niagara, LPL Financial LLC, Registered Representative, 2010 - 2015
- Joined St. Germain Investment Management in 2025

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Maurice Bowerman.

Item 4- Other Business Activities

Maurice Bowerman is a licensed insurance agent and, from time to time, will offer advice or products from this activity.

Item 5- Additional Compensation

Maurice Bowerman does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1 – Cover Page – Sylvia Callan

Sylvia M. Callan

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 584-9121

January 1, 2025

This Brochure Supplement provides information about Sylvia M. Callan that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Sylvia M. Callan is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Sylvia M. Callan, Portfolio Manager

Year of Birth: 1974

Formal Education:

- Yale University, New Haven, CT, BA Sociology

Business Background:

- Gage-Wiley & Co. Inc., Registered Representative and Research Director, 2002 – 2019
- New England Capital (a Gage Wiley affiliate), Portfolio Manager, 2002-2019
- St. Germain Securities, Inc., Portfolio Manager 2019 - 2024
- Joined St. Germain in 2019, Portfolio Manager

Professional Designations: CFA®, CFA Certificate in ESG Investing

CFA – Chartered Financial Analyst

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

CFA Certificate in ESG Investing

The CFA Institute Certificate in ESG Investing is overseen, designed, and implemented by the CFA Institute. It is designed to help investment professionals incorporate ESG Factors (environmental, social, and governance) into the investment decisions making process. The certificate is recognized by the UN Principles for Responsible Investing (PRI), a renowned global institution committed to ESG efforts. To learn more about the CFA Certificate in ESG Investing, visit www.cfainstitute.org.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this item for Sylvia M. Callan.

Item 4- Other Business Activities

Sylvia M. Callan does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Sylvia M. Callan does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Ava C. Cariddi

Ava C. Cariddi

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

May 9, 2025

This Brochure Supplement provides information about Ava Cariddi that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Ava Cariddi is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Ava Cariddi, Financial Advisor

Year of Birth: 2003

Formal Education:

- Western New England University, Bachelor of Science Degree in Business Administration with a Finance Major

Business Background:

- Joined St. Germain Investment Management in 2024, Financial Advisor

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Ava Cariddi.

Item 4- Other Business Activities

Ava Cariddi does not receive any substantial economic benefit from any person, company, or organization, other than her employers.

Item 5- Additional Compensation

Ava Cariddi does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Laura Delmolino

Laura A. Delmolino
St. Germain Investment Management, Inc.
1500 Main St., Springfield MA 01115
(413) 584-9121
January 1, 2025

This Brochure Supplement provides information about Laura A. Delmolino that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Laura A. Delmolino is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Laura A. Delmolino, Financial Advisor

Year of Birth: 1964

Formal Education:

- BA, Massachusetts College of Liberal Arts
- Financial Planning Certificate Boston University

Business Background:

- Apella Capital Certified Financial Planner 2012 to 2020
- St. Germain Securities, Inc., Financial Advisor 2021 - 2024
- Joined St. Germain Investment Management in 2021, Financial Advisor

Professional Designations: CFP®

CFP – Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Laura A. Delmolino.

Item 4- Other Business Activities

Laura A. Delmolino does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Laura A. Delmolino does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page - Matthew Farkas

Matthew R. Farkas
St. Germain Investment Management, Inc.
1500 Main St., Springfield MA 01115
(413) 733-5111
January 1, 2025

This Brochure Supplement provides information about Matthew Farkas that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew Farkas is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Matthew Robert Farkas, Vice President-Head of Fixed Income

Year of Birth: 1982

Formal Education:

- Saint Michaels College, BA Economics
- Boston University, MS Investment Management

Business Background:

- St. Germain Securities, Inc., Head of Fixed Income 2014 - 2024
- Joined St. Germain Investment Management in 2014, Senior Vice President, Head of Fixed Income

Professional Designations: CFA®

CFA – Chartered Financial Analyst

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Matthew Farkas

Item 4- Other Business Activities

Matthew Farkas does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Matthew Farkas does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page - Angelo Fiore

Angelo Fiore
St. Germain Investment Management, Inc.
1500 Main St., Springfield MA 01115
(413) 733-5111
January 1, 2025

This Brochure Supplement provides information about Angelo Fiore that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Angelo Fiore is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Angelo Fiore

Year of Birth: 2001

Formal Education:

- Western New England University, Bachelor of Science, Business Administration

Business Background:

- Cima Restaurant & Chop House, Server, 2019 – 2024
- St. Germain Securities, Inc., Financial Advisor 2023-2024
- Joined St. Germain Investment Management in 2023

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Angelo Fiore.

Item 4- Other Business Activities

Angelo Fiore does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Angelo Fiore does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

The Firm's Chief Compliance Officer, Polly Cordle and her designee, supervises all employee activities and duties at the Firm. Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1 – Cover Page – Matthew Freitag

Matthew R. Freitag

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Matthew Freitag that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew Freitag is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Matthew Freitag

Year of Birth: 1993

Formal Education:

- BS Finance Bentley University
- Masters in Personal Financial Planning Bentley University

Business Background:

- Captrust (formally RINET Company, LLC), Senior Client Advisor, 2016 - 2021
- St. Germain Securities, Inc., Financial Advisor 2021 - 2024
- Joined St. Germain Investment Management in 2021, Financial Advisor

Professional Designations: CFP®

CFP – Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Matthew R. Freitag.

Item 4- Other Business Activities

Matthew R. Freitag does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Matthew R. Freitag does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 733-5111. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Marianne Fresia

Marianne Fresia

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Marianne Fresia that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Marianne Fresia is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Marianne S. Fresia, Financial Advisor

Year of Birth: 1981

Formal Education:

- American College of Financial Services

Business Background:

- Berkshire Bank, Client Services 2000 to 2016
- Lee Bank, AVP Private Banking and Trust, 2016 to Present
- St. Germain Securities, Inc., Financial Advisor 2016 - 2024
- Joined St. Germain Investment Management in 2016, Financial Advisor

Professional Designations: CFP®

CFP – Certified Financial Planner

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Marianne Fresia.

Item 4- Other Business Activities

Marianne Fresia does not receive any substantial economic benefit from any person, company, or organization, other than her employers as listed above in exchange for providing clients advisory services through the Firm.

Item 5- Additional Compensation

Marianne Fresia does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Mary Kate Frodema

Mary Kate Frodema
St. Germain Investment Management, Inc.
1500 Main St., Springfield MA 01115
(413) 584-9121
January 1, 2025

This Brochure Supplement provides information about Mary Kate Frodema that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Mary Kate Frodema is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Mary Kate Frodema, Financial Advisor

Year of Birth: 1989

Formal Education:

- Bachelor's Degree, Business Administration, Nichols College
- Master's Degree Business Administration, Nichols College

Business Background:

- Joined St. Germain Investments as a Financial Advisor in April 2022
- Hart & Patterson Financial Group Investment Advisor Rep 2021 to 2022
- Mass Mutual Life Insurance Company Agent 2019 to 2021
- MML Investors Services, LLC Registered Rep 2011 to 2021

Mary Kate Frodema is a licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation to the firm but not directly to this individual and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. St. Germain Investment Management LLC always attempts to act in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of this firm in connection with such individual's activities outside of the Firm.

Professional Designations: CFP®

CFP – Certified Financial Planner

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Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Mary Kate Frodema.

Item 4- Other Business Activities

Mary Kate Frodema is a licensed insurance agent, and from time to time, will offer clients advice or products from those activities.

Item 5- Additional Compensation

Mary Kate Frodema does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Tanya Haas

Tanya Haas
St. Germain Investment Management, Inc.
1500 Main St., Springfield MA 01115
(413) 733-5111
July 28, 2025

This Brochure Supplement provides information about Tanya Haas that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Tanya Haas is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Tanya L Haas, Financial Advisor

Year of Birth: 1971

Formal Education:

Berkshire Community College, AS Business/Banking

Cannon Financial Institute, Inc.

Center for Financial Training, Inc.

Business Background:

- Joined St. Germain Investment Management in 2025, Financial Advisor
- Berkshire Bank, 2018 to 2025, FVP, Wealth Advisor & Trust Officer
- Alexandra Dest Capital Management, 2011 to 2018, AVP, Client Relationship Manager
- Berkshire Bank, 1995-2011, Financial Services Representative, Client Services Administrator & Trust Officer

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Tanya Haas.

Item 4- Other Business Activities

Tanya Haas does not receive any substantial economic benefit from any person, company, or organization, other than her employers.

Item 5- Additional Compensation

Tanya Haas does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Jason Irwin

Jason Irwin

St. Germain Investment Management, Inc.

62 Portsmouth Ave., Stratham, NH 03885

(603) 691-6585

June 10, 2025

This Brochure Supplement provides information about Jason Irwin that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Jason Irwin is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Jason Irwin

Year of Birth: 1985

Formal Education:

- University of Massachusetts, Dartmouth
- Middlesex Community College

Business Background:

- SP Images, Sales Account Manager, October 2014 – August 2020
- New York Life, Agent, January 2021 – June 2023
- NYLife Securities, Registered Rep, October 2022 – June 2023
- Equitable Advisors, LLC, June 2023 – April 2025
- Joined St. Germain Investment Management in 2025

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Jason Irwin.

Item 4- Other Business Activities

Jason Irwin does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Jason Irwin does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

The Firm's Chief Compliance Officer, Polly Cordle and her designee, supervises all employee activities and duties at the Firm. Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Paul Marchese

Paul J. Marchese
St. Germain Investment Management, Inc.
1500 Main St., Springfield MA 01115
(413) 733-5111
January 1, 2025

This Brochure Supplement provides information about Paul J. Marchese that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Paul J. Marchese is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Paul J. Marchese, Executive Vice President-Director of Business Development and Relationship Management

Year of Birth: 1959

Formal Education:

- Georgetown University, BA Economics
- Boston College, MBA

Business Background:

- St. Germain Securities, Inc., Director of Business Development 2002 - 2024
- Joined St. Germain Investment Management in 2002, Executive Vice President, Director of Business Development and Relationship Management

Professional Designations: ChFC®

ChFC – Chartered Financial Consultant

The Chartered Financial Consultant®(ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Paul J. Marchese.

Item 4- Other Business Activities

Paul J. Marchese does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Paul Marchese does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page - Patricia Matty

Patricia M. Matty

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Patricia Matty that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Patricia Matty is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Patricia Matty, Senior Vice President, Financial Advisory Director

Year of Birth: 1974

Formal Education:

- Holyoke Community College, Associates Degree in Business Administration
- Westfield State College, BS in Business Management

Business Background:

- St. Germain Securities, Inc., Financial Advisory Director 2003 – 2024
- Joined St. Germain Investment Management in 2003, Senior Vice President, Financial Advisory Director

Professional Designations: AIF ®

AIF – Accredited Investment Fiduciary

The Accredited Investment Fiduciary (AIF®) Designation is a professional certification that demonstrates an advisor or other person serving as an investment fiduciary has met certain requirements to earn and maintain the credential. Attainment of the AIF Designation demonstrates understanding of the Prudent Practices® and methodology.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Patricia Matty.

Item 4- Other Business Activities

Patricia Matty does not receive any substantial economic benefit from any person, company, or organization, other than her employers.

Item 5- Additional Compensation

Patricia Matty does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Michael Matty and his designee(s). Mr. Matty's phone number is (413) 733-5111. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Siobhan Matty

Siobhan G. Matty

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Siobhan G. Matty that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Siobhan G. Matty is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Siobhan G. Matty, Assistant Vice President-Financial Advisor

Year of Birth: 1990

Formal Education:

- BA American Studies, Union College

Business Background:

- Excel Dryer: 2011-2016
- Joined St. Germain Investment Management, Inc. in 2016, Assistant Vice President, Financial Advisor

Professional Designations: AIF®, AAMS®

AIF – Accredited Investment Fiduciary

The Accredited Investment Fiduciary (AIF®) Designation is a professional certification that demonstrates an advisor or other person serving as an investment fiduciary has met certain requirements to earn and maintain the credential.

Attainment of the AIF Designation demonstrates understanding of the Prudent Practices® and methodology.

AAMS – Accredited Asset Management Specialist

Accredited Asset Management Specialist (AAMS) is a professional **designation** awarded by the College for Financial Planning (CFP) to financial professionals who successfully complete a self-study program, pass an exam, and agree to comply with a code of ethics.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Siobhan G. Matty.

Item 4- Other Business Activities

Siobhan G. Matty does not receive any substantial economic benefit from any person, company, or organization, other than her employers.

Item 5- Additional Compensation

Siobhan Matty does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1 – Cover Page – Christopher Milne

Christopher B. Milne

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 584-9121

January 1, 2025

This Brochure Supplement provides information about Christopher B. Milne that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher B. Milne is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Christopher B. Milne, Managing Director

Year of Birth: 1954

Formal Education:

- University of Massachusetts, Amherst, Ma, Masters of Education
- Hampshire College, MA, BA Education

Business Background:

- GWG Insurance, President 1985-2019
- Gage- Wiley & Co. Inc., President 1985-2019
- New England Capital (a Gage Wiley affiliate), President 1994- 2019
- St. Germain Securities, Inc., Managing Director 2019 – 2024
- Joined St. Germain Investment Management, Inc. in 2019, Managing Director

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this item for Christopher B. Milne.

Item 4- Other Business Activities

Christopher B. Milne does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Christopher B. Milne does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

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Item 1- Cover Page – David Modzelewski

David Modzelewski

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

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Additional information about David Modzelewski is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: David Modzelewski

Year of Birth: 1998

Formal Education:

- Merrimack College, Bachelor of Business Administration

Business Background:

- Florence Bank, July 2020 to January 2023
- St. Germain Securities, Financial Advisor 2023 – 2024
- Joined St. Germain Investment Management in 2023

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for David Modzelewski.

Item 4- Other Business Activities

David Modzelewski does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

David Modzelewski does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

The Firm's Chief Compliance Officer, Polly Cordle and her designee, supervises all employee activities and duties at the Firm. Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1 – Cover Page – Dennis Morin

Dennis C. Morin, Jr.

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 584-9121

January 1, 2025

This Brochure Supplement provides information about Dennis C. Morin Jr. that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Dennis C. Morin Jr. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Dennis C. Morin, Jr., Financial Advisor

Year of Birth: 1987

Formal Education:

- Southern New Hampshire University, MBA Manchester, NH
- University of Massachusetts, Isenberg School of Management, Amherst, MA, BA in Business Administration

Business Background:

- United Technologies, Supply Chain Analyst 2010 – 2015
- MSI Financial Services, Registered Representative, Registered Investment Advisor, 2016 - 2017
- MSI Investor Services, Registered Representative, Registered Investment Advisor, 2017 - 2017
- Gage-Wiley & Co. Inc., Registered Representative 2017- 2019
- New England Capital (a Gage Wiley affiliate), Registered Investment Advisor, 2017 – 2019
- St. Germain Securities, Inc., Financial Advisor, 2019 - 2024
- Joined St. Germain Investment Management in 2019

Dennis C. Morin is a licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation to the firm but not directly to this individual and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. St. Germain Investment Management LLC always attempts to act in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of this firm in connection with such individual's activities outside of the Firm.

Professional Designations: CFP®

CFP – Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional

engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this item for Dennis C. Morin.

Item 4- Other Business Activities

Dennis C. Morin is a licensed insurance agent, and from time to time, will offer clients advice or products from those activities.

Item 5- Additional Compensation

Dennis C. Morin does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page - Edward O'Reilly

Edward ("Teddy") O'Reilly

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Edward O'Reilly that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Edward O'Reilly is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Edward O'Reilly

Year of Birth: 1993

Formal Education:

- George Washington University
 - Elliott School of International Affairs
 - Bachelor of Arts in International Affairs with a Concentration in Security Policy

Business Background:

- New Day Financial, LLC, Mortgage Loan Originator, July 2016 – September 2023
- St. Germain Securities, Inc., Financial Advisor 2024
- Joined St. Germain Investment Management in 2024

Financial Services Related Licenses:

- Series 65 – Uniform Investment Adviser Law Examination

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Edward O'Reilly.

Item 4- Other Business Activities

Edward O'Reilly does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Edward O'Reilly does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

The Firm's Chief Compliance Officer, Polly Cordle and her designee, supervises all employee activities and duties at the Firm. Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Brendan Roberts

Brendan Roberts

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

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Additional information about Brendan Roberts is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Brendan Roberts

Year of Birth: 1998

Formal Education:

- University of Massachusetts Isenberg School of Management, Bachelor of Finance
- University of Massachusetts Isenberg School of Management, Master of Alternative Investments

Business Background:

- MML Investors Services, Registered Representative, October 2021 – January 2024
- MassMutual Life Insurance, Agent, June 2021 – January 2024
- Isenberg School of Management, Student, September 2020 – August 2021
- St. Germain Securities, Inc., Financial Advisor 2024
- Joined St. Germain Investment Management in 2024

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Brendan Roberts.

Item 4- Other Business Activities

Brendan Roberts does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Brendan Roberts does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

The Firm's Chief Compliance Officer, Polly Cordle and her designee, supervises all employee activities and duties at the Firm. Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Kelly Selkirk

Kelly P. Selkirk

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Kelly P. Selkirk that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Kelly P. Selkirk is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Kelly P. Selkirk, Financial Advisor

Year of Birth: 1985

Formal Education:

- BA, Kinesiology with minor in Psychology, University of Massachusetts/Amherst
- MBA, University of Massachusetts/Amherst

Business Background:

- Joined St. Germain Investment Management, Inc. in 2017

Professional Designations: AIF®, CFP

AIF – Accredited Investment Fiduciary

The Accredited Investment Fiduciary (AIF®) Designation is a professional certification that demonstrates an advisor or other person serving as an investment fiduciary has met certain requirements to earn and maintain the credential. Attainment of the AIF Designation demonstrates understanding of the Prudent Practices® and methodology.

CFP – Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Kelly P. Selkirk.

Item 4- Other Business Activities

Kelly P. Selkirk does not receive any substantial economic benefit from any person, company, or organization, other than her employers.

Item 5- Additional Compensation

Kelly P. Selkirk does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Tatyana Shut

Tatyana S. Shut

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Tatyana S. Shut that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Tatyana S. Shut is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Tatyana S. Shut, Financial Advisor, Client Services Associate

Year of Birth: 1984

Formal Education:

- BA, Business Management/Marketing Concentration, Westfield State College
- MBA, Western New England University

Business Background:

- Lutheran Community Services 2001-2004
- Gordon-Cross Corporation 2004-2016
- Joined St. Germain Investment Management and St. Germain Securities, Inc. in 2017

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Tatyana S. Shut.

Item 4- Other Business Activities

Tatyana S. Shut does not receive any substantial economic benefit from any person, company, or organization, other than her employers.

Item 5- Additional Compensation

Tatyana S. Shut does not receive any substantial economic benefit from any person, company, or organization, other than her employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121.

Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Steven Tynan

Steven Tynan

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 22, 2025

This Brochure Supplement provides information about Steven Tynan that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Steven Tynan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: **Steven Tynan, Financial Advisor**

Year of Birth: 1989

Formal Education:

- College of Our Lady of the Elms, Bachelor of Business Administration, 2019

Business Background:

- Raymond James, Financial Advisor, May 2019 to Aug 2024
- Citizens Securities, Inc., Private Client Financial Advisor, Aug 2024 to Dec 2024
- Joined St. Germain Investment Management, Financial Advisor, December 2024

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Steven Tynan.

Item 4- Other Business Activities

Mr. Tynan does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Mr. Tynan does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.

Item 1- Cover Page – Thaddeus Welch

Thaddeus S. Welch, III

St. Germain Investment Management, Inc.

1500 Main St., Springfield MA 01115

(413) 733-5111

January 1, 2025

This Brochure Supplement provides information about Thaddeus S. Welch, III that supplements the St. Germain Investment Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact client services at St. Germain Investment Management, Inc. if you did not receive St. Germain Investment Management, Inc.’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Thaddeus S. Welch, III is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Name: Thaddeus S. Welch, III, Vice President-Portfolio Manager

Year of Birth: 1985

Formal Education:

- BA, Economics from Bowdoin College

Business Background:

- Berkshire Bank 2014 to 2015
- St Germain Securities, Inc., Financial Advisor 2015 – 2024
- Joined St. Germain Investment Management in 2015, Vice President, Portfolio Manager

Professional Designations: CFA®

CFA – Chartered Financial Analyst

To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

No information is applicable to this Item for Thaddeus S. Welch, III.

Item 4- Other Business Activities

Thaddeus S. Welch, III does not receive any substantial economic benefit from any person, company, or organization, other than his employers.

Item 5- Additional Compensation

Thaddeus S. Welch, III does not receive any substantial economic benefit from any person, company, or organization, other than his employers and Other Business Activities as listed above in exchange for providing clients advisory services through the Firm.

Item 6 - Supervision

All employee activities and duties at the Firm are supervised by the Firm's Chief Compliance Officer, Polly Cordle and her designee(s). Ms. Cordle's phone number is (413) 584-9121. Employees are required to adhere to applicable regulatory requirements, together with all policies and procedures outlined in the firm's Code of Ethics and compliance manuals.