

Client Relationship Summary - June 30, 2020

Introduction

Saturn Capital, Inc. ("SCI" or the "Firm") is a broker dealer registered with the Securities Exchange Commission (SEC), the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Saturn Management, LLC, is registered with the SEC as an investment advisor. Saturn Management and Saturn Capital are affiliated through common ownership and control and SCI pays Saturn Management for overhead and directly related expenses in accordance with an Expense Sharing Agreement.

Brokerage and investment advisory services and fees differ. It is important for investors to understand the differences. Free and simple tools are available to research firms and financial professionals, including SCI and its professionals, at www.investor.gov/CRS which also provides educational materials about broker-dealers, investment advisors and investing.

What investment services and advice can you provide me?

SCI brokerage services are limited to selling partnerships or tax shelters in primary distributions, acting as an underwriter or selling group participant in an initial public offering or the private placement of securities.

The Firm's private placements can involve offering securities of private companies or investment funds. In these cases, SCI acts as a placement agent for an issuer, manager, or adviser of the securities being offered. SCI generally requires investors to meet the SEC's definition of an accredited investor which establishes thresholds for net worth, experience, income, and other standards. Certain private placements may require investors to meet a higher qualification standard such as a qualified purchaser.

SCI does not open or maintain customer accounts or hold or accept customer funds or securities. Any funds are delivered directly to the offeree or held in escrow for the benefit of the offeree until all conditions of the offering are met.

SCI's financial professionals do not monitor investors' investments on an ongoing basis, and do not have or offer investment authority over them. SCI only offers a limited number of security types and consequently, it cannot meet all investors' asset class diversification needs.

SCI may serve as placement agent for securities issued of entities whose manager is owned, controlled, or affiliated with the Firm's financial professionals.

Conversation starters – Ask us the following questions:

- Given my financial situation, should I choose a brokerage service? Why or why not?
- How will SCI's representative choose investments to recommend to me?
- What is SCI and its representatives relevant experience, including, licenses, education and other qualifications?
- What do these qualifications mean?

What fees will I pay?

Investors will pay fees whether they make or lose money on their investments. Fees will reduce any amount of money earned on your investment over time. Investors should be sure that they understand what fees they are paying.

For private placements, commissions and other fees are described in detail in the offering documents. SCI will receive commission as placement agent from the issuer, manager, or adviser. Commissions are typically charged at the time of the transaction. You may also be subject to a management fee, or a carried interest fee imposed by the issuer for the benefit of the manager, which may or may not be an owner, controlled and/or affiliated with SCI or one of its financial professionals.

Conversation starters – Ask us the following questions:

- Help me understand how these fees and commissions might affect my investments?
- If someone gives you \$10,000 to invest, how much will go to fees and commissions and how much will be invested?

What are your legal obligations to investors when providing recommendations? How else does your Firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, we are required to act in the investors best interest and not put the Firm's or its representative's interests ahead of the investors'. The way the Firm makes money may create conflicts with investors' interests. Investors should understand these conflicts because they may affect the recommendation that is provided.

For example, the receipt of compensation gives SCI an incentive to recommend investors to participate in a private placement; the larger the amount of the investment, the greater the amount of compensation earned by SCI. *As another example*, one of the firm's affiliates may manage or provide advisory services to an investment fund or vehicle being offered by SCI. The affiliate may earn a management, incentive or carried interest fee from the investment fund or vehicle.

Conversation starters – Ask us the following questions:

- How might your conflicts of interest affect me, and how will you address them?
- What is SCI and its representative's relationship with the offeree going forward?
- If the offeree is an investment fund or vehicle; Is the manager or adviser an affiliate of SCI and what is the fee arrangement?

How do your financial professionals make money?

Financial professionals may receive a percentage of the commissions, fees and other compensation earned by the firm consistent with any agreements earned by our firm.

Do any of your financial professionals have legal or disciplinary history?

No; visit www.investor.gov/CRS for a free and simple search tool to research SCI and its financial professionals.

Conversation starters – Ask us the following questions:

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

Additional Information

Additional resources can be found from FINRA, www.brokercheck.finra.org or the SCI's website www.saturnpartnersvc.com. You may also call (617) 574-3330 to find the most up to date information.