

## St. James Investment Advisors, LLC

St. James Investment Advisors, LLC is an investment adviser registered with the Securities and Exchange Commission. We provide investment advisory services. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

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### What Investment Services and Advice Can You Provide Me?

We provide direct investment management services on a discretionary basis. We will determine whether our portfolios are suitable for you and maintain discretion over the implementation and investment of your account. Accounts are monitored on a daily basis and rebalanced, as necessary. Our advice is primarily limited to equities, ETFs, mutual funds, fixed income, bonds, absolute return investments, alternative investments, and cash investments. Discretionary authority is granted to our firm in the investment advisory agreement signed by you. You may impose reasonable restrictions on this authority in writing with our acknowledgement.

We also provide indirect management services as a sub-advisor for other investment advisers on a discretionary basis. At the direction of your primary investment adviser, we will invest your assets in our portfolios as described above. While we maintain discretion over the implementation and investment of our portfolios in your account, we do not enter into an agreement directly with you. Your primary investment adviser is responsible for determining whether our portfolios are suitable for you. These services may be provided within a wrap fee program sponsored by the primary investment adviser. You will receive a Form ADV 2A Brochure and Form CRS from your primary adviser.

We require that separately managed accounts under our High Dividend Yield, All Cap Equity and Blue Chip Dividend with Income composites have a minimum of \$100,000 in total asset value to be managed, and accounts under our Aggressive, Growth, Moderate, Conservative and New York Municipal composites have a minimum of \$50,000. Exceptions may be made in certain situations. *For more detailed information about our services, please see Items 4 and 7 of our [Form ADV Part 2A Brochure](#).*

Ask your financial professional:

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education, and other qualifications?

What do these qualifications mean?

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### What Fees Will I Pay?

Fees are paid quarterly, in advance or in arrears. Fees for direct management services are negotiable.

For our investment advisory services and wrap fee services, you will pay a percentage of the total assets you hold with us. The more money you invest with us, the more you will pay in fees therefore we have an incentive to encourage you to increase the assets in your account. For our wrap fee program your fee includes all trading, transactions, and portfolio management costs, but may be higher than our typical asset-based advisory fee. You may also incur additional costs like commissions and other fees due to some of our trading practices. In addition to our fee, you will also pay fees for custodial services, account maintenance, transaction fees, other brokerage fees, and mutual fund management fees. We do not share in any portion of such fees. Our fees can create conflicts of interest because when we recommend that a client roll over their retirement plan assets into an account managed by our firm, we will earn a new or increased advisory fees as a result of the rollover. *Please see Item 4 of our [Form ADV Part 2A](#) for more information about this conflict and how it is addressed.*

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

*More detailed information about our fees and costs applicable to your account can be found in our [Form ADV, Part 2A](#) (Item 5), a copy of which is available upon request and at [www.stjamesia.com](http://www.stjamesia.com).*

Ask your financial professional:

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

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## **What Are Your Legal Obligations to Me When Acting as My Investment Adviser? How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?**

*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. We charge our fees based on your total assets under management with our firm. The more money you invest with us, the more fees you will pay; therefore, we have an incentive to encourage you to increase your assets in your account. If your account grows, we will make more money..*

*For a full discussion of our conflicts of interest and how they are addressed, please see Items 4, 10, 11, 12 and 14 of our [Form ADV Part 2A](#).*

Ask your financial professional:

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

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## **How Do Your Financial Professionals Make Money?**

Our advisors receive a base salary and a percentage of revenue generated by clients that they bring in. Our advisors who are owners also receive a percentage of firm revenue. The percentages are pre-arranged and vary by advisor. This presents a conflict of interest, as our advisors have an incentive to bring in new business and increase the assets of current clients.

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## **Do You or Your Financial Professionals Have Legal or Disciplinary History?**

No. Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

Ask your financial professional:

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

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**For more information about our investment advisory services or to request the most current version of this relationship summary, please visit our website at [stjamesia.com](http://stjamesia.com), the SEC's website at [adviserinfo.sec.gov](http://adviserinfo.sec.gov), or call us at (631) 979-6520.**

Ask your financial professional:

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

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### **St. James Investment Advisors**

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**St. James Investment Advisors  
Summary of Material Changes**

Please note the following changes since the previous version of our Form CRS, dated June 4, 2021:

- We revised the description of our investment management services to reflect that we no longer offer the High Dividend Yield WRAP Portfolio.
- We removed the list of strategies we offer from Item 2.
- We added information to Item 3 to better describe the fees a retail client will pay
- We changed our disclosure of conflicts in the Example of Ways We Make Money and Conflicts of Interest to reflect St James' direct conflicts.
- We added to the conflicts that St James has an incentive to increase current client's assets.