Item 1. Introduction

Sawgrass Asset Management LLC (“Sawgrass”) is an investment adviser registered with the U.S. Securities and Exchange Commission. Investment advisory and brokerage services and fees differ; therefore, 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, which also provides educational materials about investment advisers, broker-dealers, and investing.

Item 2. Relationships and Services

“What investment services and advice can you provide me?”

Description of Services and Monitoring

Although our primary business is institutional, we do provide investment advisory services to retail investors, including asset management. For clients to whom we provide asset management services, we offer fee plus transaction accounts, which we monitor as part of an ongoing process. As part of our standard services, each investment adviser representative (“IAR”) reviews their client accounts regularly and meets with clients at their request. Factors that trigger reviews include changes to our investment recommendations, changes in market conditions, and changes to your financial situation and/or investment needs.

Investment Authority

Sawgrass offers our asset management accounts on a discretionary basis. Discretionary asset management allows us the limited authority to buy and sell investments in your account without asking you each time a transaction is placed. Our level of authority is determined at the beginning of our relationship with you in our advisory agreement but can be changed upon request.

Investment Offerings

While we can advise on any investment asset, our investment recommendations are primarily related to investments in equities, ETFs, and mutual funds. As a condition for starting and maintaining a relationship, we generally impose a minimum portfolio size of $1,000,000 which we may waive at our discretion.

Additional Information

For additional Information, please see our Form ADV Part 2A (with special emphasis on Items 4, 7, and 16), available at https://adviserinfo.sec.gov/firm/summary/108831.

Conversation Starters*

• 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?

Item 3. Fees, Costs, Conflicts, and Standard of Conduct

“What fees will I pay?”

Sawgrass’s fees are based on the type(s) of service(s) we provide.

For asset management, we charge an ongoing asset-based fee at the end of each quarter. The fee is charged as a percentage of your assets that we manage. The more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account. We do not charge a fee on “restricted” securities held in client accounts that we do not have authority to manage.

Other Fees and Costs: Some investments, such as ETFs and mutual funds, impose internal fees that will reduce the value of your investments over time. Those fees may include fund expenses and/or surrender charges. You may also pay other fees to the custodian of your assets. These include, but may not be limited to, ticket charges on transactions, fees for wire transfers, stop payments, IRA maintenance, duplicate check or statement copies, overnight deliveries, returned checks, and asset transfers.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the 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 are included in our Form ADV Part 2A (Items 5.A., B., C., and D. ), available at https://adviserinfo.sec.gov/firm/summary/108831.

* Consider asking your financial professional these questions.
“What are your legal obligations to me when acting as my investment adviser?”

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. Here are some examples to help you understand what this means.

For example, our primary custodian for retail investors provides certain research or other investment management tools without charge for maintaining client assets with them. The receipt of such economic benefits by us or our IARs in and of itself creates a potential conflict of interest and may indirectly influence our choice of a particular custodian for custody and brokerage services. To address these potential conflicts of interest, we have developed and implemented a Compliance Program, which includes a review of the services and execution quality we receive from the custodians we recommend. These arrangements and additional information about conflicts of interest are discussed in more detail in our Form ADV Part 2A, which is available at https://adviserinfo.sec.gov/firm/summary/108831.

“How else does your firm make money and what conflicts of interest do you have?”

We only generate revenues from our asset management as described above.

“How do your financial professionals make money?”

Our financial professionals are compensated through salaries and/or a portion of revenue we receive for the advisory services we provide. The portion paid to your financial professional generally does not vary based on the type of investments that are recommended.

Item 4. Disciplinary History

“Do you or your financial professionals have legal or disciplinary history?”

No – Neither the Firm nor any of our financial professionals have a disciplinary history. We invite you to visit Investor.gov/CRS for a free and simple search tool to research our Firm and financial professionals. investor.gov/CRS

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

Item 5. Additional Information

We encourage you to seek out additional information about our investment advisory services in our Form ADV Brochure on Investor.gov or adviserinfo.sec.gov. Alternatively, you can call Sawgrass toll-free at (866) 493-5500 to speak with us directly.

Conversation Starters*
- 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?

* Consider asking your financial professional these questions.