



SABATTUS CAPITAL

Sabattus Capital, LLC – Client Brochure

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Item 1 – Cover Page

This brochure provides information about the qualifications and business practices of Sabattus Capital, LLC. If you have any questions about the contents of this brochure, please contact us at info@sabattuscapital.com. 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.

Registration status does not imply a certain level of knowledge or acquired skills.

Additional information about Sabattus Capital, LLC also is available on the SEC's website at www.adviserinfo.sec.gov

Item 2 – Material Changes

There are no material changes to be disclosed for this form as this is The Firm's initial filing.

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Item 4 – Advisory Business

Sabattus Capital, LLC, henceforth referred to as “The Firm”, was formed in March 2020 in Houston, Texas. It is principally owned by Paul Weston Sabattus, henceforth referred to as “The Owner”.

The Firm specializes in U.S. securities markets (stocks) trading and projections including, but not limited to, equities and bond-backed securities. It provides advice to clients regarding long-term outlook on US markets and provides advice on trading and investing in the aforementioned market instruments. The Firm offers three forms of investment services. The client may choose to (1) open an account with The Firm (on the Interactive Brokers platform) that both parties will have access to. The Firm will not have access to the funds; it will simply be able to view the account and execute trades. This option will also include the advice and consultation of the advisers of The Firm for a total of \$30/month. The account may be managed on a discretionary basis if the client so chooses. The client may also (2) request in-depth market research for a one-time fee starting at \$200 and increasing depending on the depth of the research. Lastly, (3) for \$5/month The Firm provides access to its team of advisors. This can be purchase by opening a “Self-Directed Account” with the firm. This will be conducted through telecommunication methods.

The Firm’s advisory services are entirely catered to the desires and needs of its clients. A client may restrict The Firm from investing his/her capital in undesired investment strategies. There will also be a conversation between the parties regarding risk tolerance and investment objectives prior to agreement and The Firm will tailor the investment strategy to match this.

The Firm does not participate in a wrap fee program.

As of March 30, 2020, no assets under management by The Firm are managed on a discretionary basis and none are managed on a non-discretionary basis. This form is filed before The Firm can claim AUM as it is its initial registration.

Item 5 – Fees and Compensation

The Firm receives a monthly \$30 fee from each of its clients that choose to have an account under management. This is for the accounts that The Firm has opened and/or managed on behalf of the client. In a few cases, this fee is negotiable. The Firm also receives compensation for market research and the providing advice to “Self-Directed Accounts”.

The monthly fees will be billed through the custodial account. The Firm will send a client a bill for market research prior to sending it to them.

A client seeking investment advice may choose to pay a one-time fee for advice pertaining to desired market research. At this time, prior to conducting research, The Firm and the client will come to agreement upon payment for said advice/research. This fee will begin at a minimum of \$200 and will increase depending on the nature of the research. Custodial fees will be charged back to the client as well (this is a fee that a brokerage charges for holding assets).

The client does not pay any significant fees in advance.

The Firm does not receive compensation for the sale of securities.

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

The Firm does not charge any performance-based fees. The entirety of its compensation is derived from its fixed \$30 monthly subscription fee, subscription fees, and market research fees.

Item 7 – Types of Clients

The Firm accepts any retail clients who solicit its services. The majority of these solicitations come from private, individual investors.

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

The method of investment analysis used by The Firm depends on the desires and expectations of the client. If the client desires a more aggressive approach to generate higher return, The Firm will use more risky tactics to accomplish this. Regardless, before any investment decision, The Firm conducts due diligence to determine whether or not it fits the client's stated risk tolerance and to determine the immediate viability of such an investment. The Firm examines corporate financial statements and the current market price of the entity's publicly offered stock to determine if the shares are trading above, at, or below its fair value. Accordingly, for clients desiring safer alternatives, The Firm purchases treasury and corporate issuances and bond-backed securities for stable growth.

As with all investment decisions, there is an understood level of risk. The Firm is transparent with the risks its investing and trading tactics create. Intraday trading presents inherent risk as daily volatility can result in poor performance. Likewise, making a decision based upon financial reporting presents unique risks in that corporate entities could be hiding losses and/or liabilities by way of fraudulent activities.

"Blue Chip" stocks (such as AAPL, FB, AMZN) are a common vehicle of investment by The Firm. However, these shares are heavily susceptible to market changes and economic downturns. In such a situation, The Firm uses short selling to help minimize market exposure. Short selling subjects the client to the risk of limitless capital loss. Though these events are highly unlikely, they are still present. Investing in securities involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

There is no disciplinary information to disclose about The Firm or any of its representatives.

Item 10 – Other Financial Industry Activities and Affiliations

The Firm does not have any material other financial industry activities or affiliations.

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

The Firm nor any of its representatives are SEC registered advisers.

In the event that The Firm or The Owner purchases or recommends a security that it currently possesses a material financial interest with, it will provide full disclosure to the client and allow him/her to sell the security if desired.

In the event that The Firm or The Owner invests in a security that it is currently recommending or purchasing on behalf of a client, the aforementioned will provide full disclosure and allow the client to sell interests if desired.

In the event that The Firm or The Owner purchases a security that it is currently recommending or purchasing on behalf of a client, the aforementioned will provide full disclosure and allow the client to sell interests if desired.

Item 12 – Brokerage Practices

The Firm requires its clients use Interactive Brokers LLC as it is The Firm's custodian. The client will have commission charged to their account on behalf of the broker-dealer. The Firm nor any of its representatives receive compensation, whether soft-dollar or hard-dollar, for this relationship. The Firm does not otherwise recommend broker-dealers or evaluate the fairness of their compensation.

The Firm does not aggregate client accounts, meaning it does not pull together a client's full financial portfolio held with different brokerages. This may result in costs charged to the client by third-party advisors or firms at which the client's assets are held.

Item 13 – Review of Accounts

The Firm reviews client accounts on a weekly basis to ensure the client's performance criteria is met. This right is reserved to executives and advisers to the firm.

An account will be reviewed within two business days upon a client's request.

There is no written review provided to clients regarding their account. However, it is the expectation of The Firm to remain in communication, whether oral or electronic, with each of its clients throughout the period of the advisory relationship.

Item 14 – Client Referrals and Other Compensation

The Firm prohibits any unlicensed individual from advising to its clients on behalf of The Firm. However, there may be ad hoc arrangements in which a third party provides advice to The Owner. Compensation for such arrangements will be determined on a case by case basis to prevent any conflicts of interest.

As aforementioned, any compensation to a third-party advisor will be made on a case by case basis.

Item 15 – Custody

The client will receive account statements directly from the qualified custodian (Interactive Brokers). These reports will be received electronically via email and/or directly through standard mail. The client should be careful to review each statement against the statement from The Firm.

Item 16 – Investment Discretion

Prior to exercising investment discretion over a client's account, The Firm will request permission from the client. Discretion refers to the adviser's ability to buy/sell securities on the client's behalf without consulting him/her first. This will be in the form of a written request. If the client denies, The Firm will only execute transactions that the client requests. If the client approves, The Firm will act as the client's fiduciary adviser and implement discretionary transactions upon the client's account. The adviser will then have full authority, within the confines of the fiduciary obligation, to trade on behalf of the client.

Item 17 – Voting Client Securities

The Firm will not be voting client securities. For separately managed accounts, the client will receive proxies (shareholder votes) directly from the custodian. The Firm will not provide advice nor consultation regarding proxies or voting responsibilities. This is the responsibility of the client.

Item 18 – Financial Information

There is so substantial prepayment of fees require (\$500 or more six months in advance) charged to the client by The Firm. Thus, no audited balance sheet is required on behalf of The Firm.

There is no financial condition that will impair The Firm from meeting its financial obligations.

Accordingly, The Firm has not been subject to bankruptcy nor has any reason to believe it will be in the foreseeable future.

Item 19 – Requirements for State Registered Advisers

The Owner – B.S. Finance – Liberty University. He is a financial accountant adviser with The Firm.

The Owner is a financial accountant with experience in the energy sector.

Fees are calculated as described in “Item 5 – Fees and Compensation”. The Firm does not charge any performance fees at this time.

The Firm nor any of its representatives have been involved in any criminal events such as fraud, theft, bribery, etc. as listed in Item 19(D) in the Form ADV Part 2A.

The Firm possesses no material relationships with any securities issuers.