

BrokerCheck Report

SENTINEL SECURITIES, LLC.

CRD# 110942

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

• **Thank you for using FINRA BrokerCheck.**



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.



SENTINEL SECURITIES, LLC.
CRD# 110942
SEC# 8-53142

Main Office Location
100 QUANNAPOWITT PKWY
SUITE 402
WAKEFIELD, MA 01880
Regulated by FINRA Boston Office

Mailing Address
100 QUANNAPOWITT PKWY
SUITE 300
WAKEFIELD, MA 01880

Business Telephone Number
781 914-1254

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile
This firm is classified as a limited liability company.
This firm was formed in Delaware on 03/25/2025.
Its fiscal year ends in December.

Firm History
Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations
This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 50 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 12 types of businesses.
This firm is affiliated with financial or investment institutions.
This firm has referral or financial arrangements with other brokers or dealers.

Disclosure Events
Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 03/25/2025.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

SENTINEL SECURITIES, LLC.

Doing business as SENTINEL SECURITIES, LLC.

CRD# 110942

SEC# 8-53142

Main Office Location

100 QUANNAPOWITT PKWY
SUITE 402
WAKEFIELD, MA 01880

Regulated by FINRA Boston Office

Mailing Address

100 QUANNAPOWITT PKWY
SUITE 300
WAKEFIELD, MA 01880

Business Telephone Number

781 914-1254



Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	NEW SENTINEL HOLDCO, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	06/2025
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	CARNEVALE, JAMES MICHAEL 2710745
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT
Position Start Date	11/2013
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	DIMASE, ROBERT MICHAEL 2196424
Is this a domestic or foreign entity or an individual?	Individual
Position	DIRECTOR
Position Start Date	02/2000

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): DUSTIN JR, DOUGLAS K
5790881

Is this a domestic or foreign entity or an individual? Individual

Position FINOP / CFO

Position Start Date 06/2017

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): NESTOR, JAMES MICHAEL
2636194

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF COMPLIANCE OFFICER

Position Start Date 01/2011

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No



Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

Legal Name & CRD# (if any):	FERDINAND FFP ACQUISITION, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	FOCUS FINANCIAL PARTNERS INC.
Relationship to Direct Owner	SHAREHOLDER, CLASS A COMMON STOCK
Relationship Established	08/2023
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
<hr/>	
Legal Name & CRD# (if any):	FERDINAND FFP INTERMEDIATE HOLDINGS, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	FERDINAND FFP ACQUISITION, LLC
Relationship to Direct Owner	MEMBER
Relationship Established	08/2023
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
<hr/>	
Legal Name & CRD# (if any):	FERDINAND FFP PARENT, INC.
Is this a domestic or foreign entity or an individual?	Domestic Entity



Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established FERDINAND FFP INTERMEDIATE HOLDINGS, LLC

Relationship to Direct Owner MEMBER

Relationship Established 08/2023

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): FERDINAND FFP ULTIMATE HOLDINGS, LP

Is this a domestic or foreign entity or an individual? Domestic Entity

Company through which indirect ownership is established FERDINAND FFP PARENT, INC.

Relationship to Direct Owner SHAREHOLDER

Relationship Established 08/2023

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): FERDINAND FFP ULTIMATE HOLDINGS, LP

Is this a domestic or foreign entity or an individual? Domestic Entity

Company through which indirect ownership is established FOCUS FINANCIAL PARTNERS INC.

Relationship to Direct Owner SHAREHOLDER, CLASS B COMMON STOCK

Relationship Established 08/2023

Firm Profile



Indirect Owners (continued)

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): FOCUS FINANCIAL PARTNERS INC.

Is this a domestic or foreign entity or an individual? Domestic Entity

Company through which indirect ownership is established FOCUS FINANCIAL PARTNERS, LLC

Relationship to Direct Owner MEMBER

Relationship Established 07/2018

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): FOCUS FINANCIAL PARTNERS, LLC

Is this a domestic or foreign entity or an individual? Domestic Entity

Company through which indirect ownership is established FOCUS OPERATING, LLC

Relationship to Direct Owner MEMBER

Relationship Established 01/2020

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Firm Profile



Indirect Owners (continued) company?

Legal Name & CRD# (if any):	FOCUS OPERATING, LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	NEW SENTINEL HOLDCO, LLC
Relationship to Direct Owner	MEMBER
Relationship Established	06/2025
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
Legal Name & CRD# (if any):	CD&R FERDINAND HOLDINGS, L.P.
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	FERDINAND FFP ULTIMATE HOLDINGS, LP
Relationship to Direct Owner	PARTNER
Relationship Established	08/2023
Percentage of Ownership	50% but less than 75%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
Legal Name & CRD# (if any):	CLAYTON, DUBILIER & RICE FUND XII, L.P.
Is this a domestic or foreign entity or an individual?	Foreign Entity



Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established CD&R FERDINAND HOLDINGS, L.P.

Relationship to Direct Owner PARTNER

Relationship Established 08/2023

Percentage of Ownership 50% but less than 75%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): CD&R FERDINAND CO-INVESTOR, L.P.

Is this a domestic or foreign entity or an individual? Foreign Entity

Company through which indirect ownership is established CD&R FERDINAND HOLDINGS, L.P.

Relationship to Direct Owner PARTNER

Relationship Established 08/2023

Percentage of Ownership 25% but less than 50%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No



Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

This firm was previously:	SENTINEL SECURITIES, INC.
Date of Succession:	03/25/2025
Predecessor CRD#:	110942
Predecessor SEC#:	8-53142
Description	THE FIRM HAS CONVERTED FROM A MASSACHUSETTS CORPORATION TO A DELAWARE LIMITED LIABILITY COMPANY (LLC) (THE "CONVERSION") AND THE FIRM'S NAME HAS CHANGED FROM "SENTINEL SECURITIES, INC." TO "SENTINEL SECURITIES, LLC." ALL ASSETS, LIABILITIES, AND OBLIGATIONS OF THE MASSACHUSETTS CORPORATION HAVE BEEN TRANSFERRED TO THE DELAWARE LLC.
This firm was previously:	SENTINEL SECURITIES, INC.
Date of Succession:	03/25/2025
Predecessor CRD#:	110942
Predecessor SEC#:	8-53142
Description	THE FIRM HAS CONVERTED FROM A MASSACHUSETTS CORPORATION TO A DELAWARE LIMITED LIABILITY COMPANY (LLC) (THE "CONVERSION") AND THE FIRM'S NAME HAS CHANGED FROM "SENTINEL SECURITIES, INC." TO "SENTINEL SECURITIES, LLC." ALL ASSETS, LIABILITIES, AND OBLIGATIONS OF THE MASSACHUSETTS CORPORATION HAVE BEEN TRANSFERRED TO THE DELAWARE LLC.
This firm was previously:	SENTINEL SECURITIES, INC.
Date of Succession:	03/25/2025
Predecessor CRD#:	110942
Predecessor SEC#:	8-53142
Description	THE FIRM HAS CONVERTED FROM A MASSACHUSETTS CORPORATION TO A DELAWARE LIMITED LIABILITY COMPANY (LLC) (THE "CONVERSION") AND THE FIRM'S NAME HAS CHANGED FROM "SENTINEL SECURITIES, INC." TO "SENTINEL SECURITIES, LLC." ALL ASSETS, LIABILITIES, AND OBLIGATIONS OF THE MASSACHUSETTS CORPORATION HAVE BEEN TRANSFERRED TO THE DELAWARE LLC. THERE IS/WAS NOT A SUBSTANTIAL CHANGE IN CONTROL IN OWNERSHIP AND/OR CONTROL.



Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 50 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	08/09/2001

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	08/09/2001



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	04/03/2006
Alaska	Approved	09/10/2007
Arizona	Approved	03/28/2002
Arkansas	Approved	04/17/2006
California	Approved	03/22/2002
Colorado	Approved	04/15/2002
Connecticut	Approved	01/02/2002
Delaware	Approved	05/26/2004
District of Columbia	Approved	05/09/2002
Florida	Approved	03/13/2002
Georgia	Approved	06/04/2002
Hawaii	Approved	04/24/2006
Idaho	Approved	09/11/2007
Illinois	Approved	04/08/2002
Indiana	Approved	12/12/2001
Iowa	Approved	06/21/2007
Kansas	Approved	04/11/2006
Kentucky	Approved	12/06/2002
Louisiana	Approved	03/06/2006
Maine	Approved	04/25/2002
Maryland	Approved	04/16/2002
Massachusetts	Approved	08/16/2001
Michigan	Approved	03/25/2002
Minnesota	Approved	09/29/2004
Mississippi	Approved	10/03/2006
Missouri	Approved	03/21/2006
Montana	Approved	07/31/2007
Nebraska	Approved	11/14/2007
Nevada	Approved	10/06/2004
New Hampshire	Approved	11/24/2003
New Jersey	Approved	05/23/2002
New Mexico	Approved	11/05/2007
New York	Approved	03/13/2002

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	04/01/2002
North Dakota	Approved	10/12/2007
Ohio	Approved	03/22/2002
Oklahoma	Approved	03/03/2006
Oregon	Approved	05/10/2004
Pennsylvania	Approved	01/28/2002
Rhode Island	Approved	01/10/2002
South Carolina	Approved	04/28/2004
Tennessee	Approved	02/27/2002
Texas	Approved	05/16/2002
Utah	Approved	02/27/2006
Vermont	Approved	12/10/2002
Virginia	Approved	03/12/2002
Washington	Approved	03/19/2002
West Virginia	Approved	09/10/2007
Wisconsin	Approved	03/22/2002
Wyoming	Approved	10/04/2007



Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 12 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Underwriter or selling group participant (corporate securities other than mutual funds)
Mutual fund retailer
U S. government securities broker
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Broker or dealer selling oil and gas interests
Put and call broker or dealer or option writer
Broker or dealer selling tax shelters or limited partnerships in primary distributions
Broker or dealer selling tax shelters or limited partnerships in the secondary market
Non-exchange member arranging for transactions in listed securities by exchange member

Firm Operations



Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

Name:	PERSHING LLC
CRD #:	7560
Business Address:	ONE PERSHING PLAZA JERSEY CITY, NJ 07399
Effective Date:	12/05/2007
Description:	PERSHING, LLC IS OUR CLEARING FIRM, AS WE ARE A FULLY DISCLOSED INTRODUCING BROKER - DEALER.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399
Effective Date: 12/05/2007
Description: PERSHING, LLC IS OUR CLEARING FIRM, AS WE ARE A FULLY DISCLOSED INTRODUCING BROKER-DEALER. PERSHING PROVIDES CERTAIN REGULATORY REPORTING SERVICES AS PART OF THIS ARRANGEMENT.

Name: RED OAK COMPLIANCE SOLUTIONS
Business Address: 1320 ARROW POINT DRIVE,
SUITE 411
CEDER PARK, TX 78613
Effective Date: 01/01/2023
Description: ADVERTISING REVIEW AND ARCHIVING SYSTEM

Name: SMARSH, INC.
Business Address: 921 SW. WASHINGTON STREET
SUITE 540
PORTLAND, OR 97205
Effective Date: 06/03/2013
Description: HOSTING REGISTERED REPRESENTATIVES E-MAIL.

This firm does have accounts, funds, or securities maintained by a third party.

Name: PERSHING LLC
CRD #: 7560
Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07395
Effective Date: 12/05/2007
Description: PERSHING, LLC IS OUR CLEARING FIRM, AS WE ARE A FULLY DISCLOSED INTRODUCING BROKER-DEALER. ACCOUNTS, FUNDS, AND SECURITIES OF THE APPLICANT ARE MAINTAINED BY PERSHING AS

Firm Operations



Industry Arrangements (continued)

PART OF THIS ARRANGEMENT.

This firm does have customer accounts, funds, or securities maintained by a third party.

Name: PERSHING LLC

CRD #: 7560

Business Address: ONE PERSHING PLAZA
JERSEY CITY, NJ 07399

Effective Date: 12/05/2007

Description: PERSHING, LLC IS OUR CLEARING FIRM AS WE ARE A FULLY DISCLOSED INTRODUCING BROKER-DEALER. ACCOUNTS, FUNDS, AND SECURITIES OF CUSTOMERS OF THE APPLICANT ARE MAINTAINED BY PERSHING AS PART OF THIS ARRANGEMENT.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.**

FLINT HILLS REAL ASSETS GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	07/07/2025
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS STRATEGIC INVESTORS XII GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	03/14/2025
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS VALOR ATREIDES GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET
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Firm Operations



Organization Affiliates (continued)

SUITE 700
KANSAS CITY, MO 64112

Effective Date: 02/21/2025

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CPCM PIF III GP LLC is under common control with the firm.

Business Address: 675 PETER JEFFERSON PARKWAY
SUITE 400
CHARLOTTESVILLE, VA 22911

Effective Date: 03/04/2025

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FOCUS PARTNERS AUSTRALIA ACCOUNTING PTY LTD is under common control with the firm.

Business Address: LEVEL 8, 17 CASTLEREAGH STREET
SYDNEY, AUSTRALIA

Effective Date: 09/16/2020

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

Firm Operations



Organization Affiliates (continued)

FLINT HILLS MONOMOY V GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	03/27/2024
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SCS PRIVATE EQUITY IV GP LLC is under common control with the firm.

Business Address:	888 BOYLSTON STREET SUITE 1010 SUITE 1010 BOSTON, MA 02119
Effective Date:	07/03/2017
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS MCR HOSPITALITY IV GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/03/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory	Yes

Firm Operations



Organization Affiliates (continued)

Activities:

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

COLONY FUNDS FFO, LLC is under common control with the firm.

Business Address: ONE BOSTON PLACE, 11TH FLOOR
201 WASHINGTON STREET
BOSTON, MA 02108

Effective Date: 08/16/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CD&R ASSOCIATES XII, L.P. is under common control with the firm.

Business Address: C/O MAPLES CORPORATE SERVICES LIMITED, P.O. BOX 30
UGLAND HOUSE
GRAND CAYMAN, CAYMAN ISLANDS KY1-1104

Effective Date: 08/31/2023

Foreign Entity: Yes

Country: CAYMAN ISLANDS

Securities Activities: No

Investment Advisory Activities: Yes

Description: INVESTMENT VEHICLES CONTROLLED BY CD&R ASSOCIATES XII, L.P.
INDIRECTLY CONTROL FOCUS FINANCIAL PARTNERS INC., ONE OF
APPLICANT'S INDIRECT OWNERS.

OIG MANAGER D380, LLC is under common control with the firm.

Business Address: 121 WEST WACKER
SUITE 1000
CHICAGO, IL 60601

Effective Date: 11/17/2023

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

LSA ACCESS FUND GP LLC is under common control with the firm.

Business Address:	145 MAPLEWOOD AVENUE SUITE 210 PORTSMOUTH, NH 03801
Effective Date:	10/19/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OI-LO MANAGER, LLC is under common control with the firm.

Business Address:	121 WEST WACKER SUITE 1000 CHICAGO, IL 60601
Effective Date:	07/05/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG-MANAGER MG, LLC is under common control with the firm.

Business Address:	121 WEST WACKER
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Firm Operations



Organization Affiliates (continued)

SUITE 1000
CHICAGO, IL 60601

Effective Date: 09/05/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OCTOGONE BRICKELL OPPORTUNITY MANAGER LLC is under common control with the firm.

Business Address: 1395 BRICKELL AVENUE
SUITE 1180
MIAMI, FL 33131

Effective Date: 03/09/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG OZ-OI MANAGER III, LLC is under common control with the firm.

Business Address: 121 WEST WACKER
SUITE 1000
CHICAGO, IL 60601

Effective Date: 05/31/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

Firm Operations



Organization Affiliates (continued)

OIG-SCF MANAGER, LLC is under common control with the firm.

Business Address:	121 WEST WACKER SUITE 1000 CHICAGO, IL 60601
Effective Date:	04/03/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OI-AS MANAGER, LLC is under common control with the firm.

Business Address:	121 WEST WACKER SUITE 1000 CHICAGO, IL 60601
Effective Date:	05/16/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

WESTCOURT CAPITAL ULC is under common control with the firm.

Business Address:	175 BLOOR STREET EAST NORTH TOWER #901 TORONTO, CANADA M4W 3R8
Effective Date:	05/01/2023
Foreign Entity:	Yes
Country:	CANADA
Securities Activities:	No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

PRIVATE CREDIT STRATEGIES III OFFSHORE GP, LLC is under common control with the firm.

Business Address: 888 BOYLSTON STREET
SUITE 1010
BOSTON, MA 02199

Effective Date: 03/26/2018

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ORIGIN CREDIT ADVISERS, LLC is under common control with the firm.

CRD #: 324839

Business Address: 4600 SYRACUSE STREET
9TH FLOOR
DENVER, CO 80237

Effective Date: 03/01/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG-MCF MANAGER, LLC is under common control with the firm.

Business Address: 121 WEST WACKER
SUITE 1000
CHICAGO, IL 60601

Effective Date: 03/01/2023

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG-MANAGER IV, LLC is under common control with the firm.

Business Address:	121 WEST WACKER SUITE 1000 CHICAGO, IL 60601
Effective Date:	03/01/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG-MANAGER III, LLC is under common control with the firm.

Business Address:	121 WEST WACKER SUITE 1000 CHICAGO, IL 60601
Effective Date:	03/01/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG-MANAGER II, LLC is under common control with the firm.

Business Address:	121 WEST WACKER
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Firm Operations



Organization Affiliates (continued)

SUITE 1000
CHICAGO, IL 60601

Effective Date: 03/01/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG-IPF MANAGER, LLC is under common control with the firm.

Business Address: 121 WEST WACKER
SUITE 1000
CHICAGO, IL 60601

Effective Date: 03/01/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG-INVESTCO, LLC is under common control with the firm.

Business Address: 121 WEST WACKER
SUITE 1000
CHICAGO, IL 60601

Effective Date: 03/01/2023

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

Firm Operations



Organization Affiliates (continued)

OIG OZ-OI MANAGER, LLC is under common control with the firm.

Business Address:	121 WEST WACKER SUITE 1000 CHICAGO, IL 60601
Effective Date:	03/01/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OIG OZ-OI MANAGER II, LLC is under common control with the firm.

Business Address:	121 WEST WACKER SUITE 1000 CHICAGO, IL 60601
Effective Date:	03/01/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OCTOGONE MIDDLE EAST LIMITED is under common control with the firm.

Business Address:	INDEX TOWER, DUBAI INTERNATIONAL FINANCIAL CENTRE UNIT 1612, FLOOR 16, PO BOX 506604 DUBAI, UNITED ARAB EMIRATES
Effective Date:	12/07/2022
Foreign Entity:	Yes
Country:	UNITED ARAB EMIRATES
Securities Activities:	No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CPCM PIF II GP LLC is under common control with the firm.

Business Address: 675 PETER JEFFERSON PARKWAY
SUITE 400
CHARLOTTESVILLE, VA 22911

Effective Date: 12/01/2022

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

BEAUMONT FINANCIAL PARTNERS is under common control with the firm.

CRD #: 322925

Business Address: 250 FIRST AVENUE
SUITE 101
NEEDHAM, MA 02494

Effective Date: 11/14/2022

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FOURTHOUGHT FINANCIAL PARTNERS, LLC. is under common control with the firm.

CRD #: 323060

Business Address: 310 VENICE AVENUE
SUITE 201
VENICE, FL 34285

Firm Operations



Organization Affiliates (continued)

Effective Date: 11/01/2022
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

MEDIQ FINANCIAL SERVICES PTY LTD is under common control with the firm.

Business Address: SUITE 3, LEVEL 1 71 QUEENS ROAD
MELBOURNE VIC, AUSTRALIA 3004
Effective Date: 05/01/2020
Foreign Entity: Yes
Country: AUSTRALIA
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ASPIRI FINANCIAL PTY LTD is under common control with the firm.

Business Address: UNIT 601, 55 BARKER STREET,
NEW FARM, QLD, AUSTRALIA 4005
Effective Date: 05/01/2021
Foreign Entity: Yes
Country: AUSTRALIA
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ALPHA ADVICE AUSTRALIA PTY LTD is under common control with the firm.

Business Address: SUITE 15, LEVEL 2, 432 CHAPEL ROAD

Firm Operations



Organization Affiliates (continued)

BANKSTOWN NSW, AUSTRALIA 2200

Effective Date: 07/01/2021

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OCTOGONE NA is under common control with the firm.

CRD #: 322478

Business Address: 1395 BRICKELL AVENUE SUITE 1180
MIAMI, FL 33131

Effective Date: 07/01/2022

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS SLXII GP, LLC is under common control with the firm.

Business Address: 2820 ROSS TOWER 500 NORTH AKARD STREET
DALLAS, TX 75201

Effective Date: 04/14/2022

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

Firm Operations



Organization Affiliates (continued)

ICON WEALTH PARTNERS is under common control with the firm.

CRD #:	319609
Business Address:	1980 POST OAK BOULEVARD SUITE 1300 HOUSTON, TX 77056
Effective Date:	08/01/2022
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS MPIV GP, LLC is under common control with the firm.

Business Address:	2820 ROSS TOWER 500 NORTH AKARD STREET DALLS, TX 75201
Effective Date:	04/14/2022
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS IVYII GP, LLC is under common control with the firm.

Business Address:	2820 ROSS TOWER 500 NORTH AKARD STREET DALLAS, TX 75201
Effective Date:	04/14/2022
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OCTOGONE FUND MANAGEMENT, LTD. is under common control with the firm.

Business Address: NO 3 OFFICES AT OLD FORT BAY P. O. BOX SP-63157, W
NASSAU, BAHAMAS

Effective Date: 07/01/2022

Foreign Entity: Yes

Country: BAHAMAS

Securities Activities: No

**Investment Advisory
Activities:** Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

OCTOGONE GESTION SARL is under common control with the firm.

Business Address: 26, RUE DE-CANDOLLE CP 331, 1211 GENEVA 4
1205 GENEVA, SWITZERLAND

Effective Date: 07/01/2022

Foreign Entity: Yes

Country: SWITZZERLAND

Securities Activities: No

**Investment Advisory
Activities:** Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FININVESTA SARL is under common control with the firm.

Business Address: 26, RUE DE-CANDOLLE CP 331, 1211 GENEVA 4
1205 GENEVA, SWITZERLAND

Effective Date: 07/01/2022

Foreign Entity: Yes

Country: SWITZERLAND

Securities Activities: No

**Investment Advisory
Activities:** Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

AZIMUTH CAPITAL MANAGEMENT LLC is under common control with the firm.

CRD #: 319062

Business Address: 200 EAST LONG LAKE ROAD
SUITE 160
BLOOMFIELD HILLS, MI 48304

Effective Date: 04/01/2022

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ULLMANN WEALTH PARTNERS is under common control with the firm.

CRD #: 316697

Business Address: 1540 THE GREENS WAY
JACKSON BEACH, FL 32250

Effective Date: 12/31/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SCS PRIVATE INVESTMENT GP, LLC is under common control with the firm.

Business Address: 888 BOYLESTON ST
SUITE 1010
BOSTON, MA 02199

Effective Date: 07/03/2017

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:
Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

MOSAIC WEALTH is under common control with the firm.
CRD #: 317377

Business Address: 1401 SOUTH BRENTWOOD BOULEVARD
SUITE 630
ST LOUIS, MO

Effective Date: 12/31/2021

Foreign Entity: No

Country:
Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS PRIVATE EQUITY VI GP is under common control with the firm.
Business Address: 4900 MAIN STREET SUITE 700
KANSAS CITY, MO 64112

Effective Date: 01/04/2022

Foreign Entity: No

Country:
Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CASSADAY & COMPANY, INC. is under common control with the firm.
CRD #: 317672

Business Address: 8180 GREENSBORO DRIVE SUITE 1180

Firm Operations



Organization Affiliates (continued)

MCLEAN, VA 22102

Effective Date: 12/31/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ARS WEALTH ADVISORS is under common control with the firm.

CRD #: 314882

Business Address: 111 SECOND AVE NE
SUITE 900
ST PETERSBURG, FL 33701

Effective Date: 07/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ALLEY COMPANY is under common control with the firm.

CRD #: 317544

Business Address: 272 MARKET SQUARE
SUITE 215
LAKE FOREST, IL 60045

Effective Date: 12/31/2021

Foreign Entity: No

Country:

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING,, LLC

TRIDENT FINANCIAL PLANNING LIMITED is under common control with the firm.

Business Address: 1 MARKHAM MEWS BROAD STREET WOKINGHAM
BERSHIRE, UNITED KINGDOM RG401AB

Effective Date: 10/01/2021

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

TOPRIDGE CAPITAL PARTNERS II, LLC is under common control with the firm.

Business Address: 231 SUTTON STREET
SUITES 2A AND 2B
NORTH ANDOVER, MA 01845

Effective Date: 11/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SONORA INVESTMENT MANAGEMENT is under common control with the firm.

CRD #: 315312

Business Address: 2343 E. BROADWAY BOULEVARD
SUITE 116
TUCSON, AZ 85719

Effective Date: 10/01/2021

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ROLLINS FINANCIAL ADVISORS, LLC is under common control with the firm.

CRD #:	312921
Business Address:	3343 PEACHTREE ROAD NE SUITE 500 ATLANTA, GA 30326
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

PRAIRIE CAPITAL MANAGEMENT GROUP, LLC is under common control with the firm.

CRD #:	311623
Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

Firm Operations



Organization Affiliates (continued)

MWM CAPITAL PTY LTD is under common control with the firm.

Business Address:	16 MARINER COURT NEWPORT, AUSTRALIA QLD 4020
Effective Date:	10/01/2021
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

MISSE WEALTH MANAGEMENT PTY LTD. is under common control with the firm.

Business Address:	16 MARINER COURT NEWPORT, AUSTRALIA QLD 4020
Effective Date:	10/01/2021
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

LINK PRIVATE PTY LTD is under common control with the firm.

Business Address:	205 BALACLAVA ROAD LEVEL 2 CAULFIELD NORTH, AUSTRALIA VIC3161
Effective Date:	12/01/2020
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

HLB FINANCIAL SERVICES LIMITED is under common control with the firm.

Business Address: FOUNDATION HOUSE SCOTT DRIVE, ALTRINCHAM
CHESIRE, UNITED KINGDOM WA158AB

Effective Date: 04/01/2008

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

HILLYER MCKEOWN FINANCIAL SERVICES LLP is under common control with the firm.

Business Address: FOUNDATION HOUSE SCOTT DRIVE, ALTRINCHAM
CHESIRE, UNITED KINGDOM WA158AB

Effective Date: 10/11/2010

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

GAVIN SPECIAL OPPORTUNITIES FUND II GP, LLC is under common control with the firm.

Business Address: 50 BAY ST
SUITE 1444
TORONTO ON, CANADA

Effective Date: 10/01/2021

Foreign Entity: Yes

Country: CANADA

Securities Activities: No

Investment Advisory Yes

Firm Operations



Organization Affiliates (continued)

Activities:

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS WESTCAP FUND II GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 10/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS VENTURE OPPORTUNITIES GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS UTICA CO-INVEST GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:
Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS TRAVERSE CO-INVEST GP, LLC is under common control with the firm.
Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:
Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS TITAN GP, LLC is under common control with the firm.
Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 11/01/2021

Foreign Entity: No

Country:
Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS STRATEGIC SMALL MID CAP GP, LLC is under common control with the firm.
Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Firm Operations



Organization Affiliates (continued)

Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS SPARTAN CO-INVEST GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS PRIVATE EQUITY V GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS PRIVATE EQUITY IV GP, LLC is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS PRIVATE EQUITY III GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS PRIVATE EQUITY II GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS PRIVATE EQUITY GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS MANAGED EQUITY FUND I GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS LONG/SHORT EQUITY GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Firm Operations



Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS KISSNER CO-INVEST 2020 GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS FOUNDERS IV GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	10/04/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS FOUNDERS II GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/01/2021

Firm Operations



Organization Affiliates (continued)

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS FOUNDERS GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS EMG OPPORTUNITY II GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS EMG OPPORTUNITY GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET

Firm Operations



Organization Affiliates (continued)

SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS ELLIOTT CO-INVEST II GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 09/07/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS ELLIOTT CO-INVEST GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

Firm Operations



Organization Affiliates (continued)

FLINT HILLS DIVERSIFIED STRATEGIES GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CYBERSECURITY GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CREDIT OPPORTUNITIES IV GP, LLC is under common control with the firm.

Business Address:	4900 MAIN STREET SUITE 700 KANSAS CITY, MO 64112
Effective Date:	04/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CREDIT OPPORTUNITIES III GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CREDIT OPPORTUNITIES II GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CREDIT OPPORTUNITIES GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CONCENTRATED GLOBAL L/S EQUITY GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CEC OPPORTUNITY II GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CEC OPPORTUNITY GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Firm Operations



Organization Affiliates (continued)

Effective Date: 04/01/2021
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS BH NEW OPPORTUNITY 2015 CO-INVEST FUND GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
 SUITE 700
 KANSAS CITY, MO 64112
Effective Date: 04/01/2021
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS ASCENT CO-INVEST II GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
 SUITE 700
 KANSAS CITY, MO 64112
Effective Date: 04/01/2021
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS AEP CO-INVEST GP, LLC is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO 64112

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS ACTIVIST STRATEGIES GP, LLC is under common control with the firm.

Business Address: 4900 MAIN STREET
SUITE 700
KANSAS CITY, MO

Effective Date: 04/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CPCM PIF GP LLC is under common control with the firm.

Business Address: 675 PETER JEFFERSON PARKWAY
SUITE 400
CHARLOTTESVILLE, VA 22911

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CPCM PEF GP LLC is under common control with the firm.

Business Address: 675 PETER JEFFERSON PARKWAY
SUITE 400
CHARLOTTESVILLE, VA 22911

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CPCM DAF GP LLC is under common control with the firm.

Business Address: 675 PETER JEFFERSON PARKWAY
SUITE 400
CHARLOTTESVILLE, VA 22911

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CARDINAL POINT CAPITAL MANAGEMENT, ULC is under common control with the firm.

CRD #: 140619

Business Address: 1243 ISLINGTON AVENUE
SUITE 903
TORONTO, CANADA ON M8X1Y9

Effective Date: 11/01/2021

Foreign Entity: Yes

Firm Operations



Organization Affiliates (continued)

Country: CANADA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS COINVEST GP, LLC is under common control with the firm.

Business Address: 2820 ROSS TOWER
500 NORTH AKARD STREET
DALLAS, TX 75201

Effective Date: 07/07/2020

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS CGFIV GP, LLC is under common control with the firm.

Business Address: 2820 ROSS TOWER
500 NORTH AKARD STREET
DALLAS, TX 75201

Effective Date: 04/08/2020

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

BADGLEY PHELPS WEALTH MANAGERS is under common control with the firm.

CRD #: 315440

Business Address: 1420 FIFTH AVENUE SUITE 3200

Firm Operations



Organization Affiliates (continued)

SEATTLE, WA 98101

Effective Date: 08/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ANCORA RETIREMENT PLAN ADVISORS, LLC is under common control with the firm.

CRD #: 31256

Business Address: 6060 PARKLAND BOULEVARD
SUITE 200
CLEVELAND, OH 44124

Effective Date: 10/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ANCORA PRIVATE WEALTH ADVISORS, LLC is under common control with the firm.

CRD #: 124845

Business Address: 6060 PARKLAND BOULEVARD
SUITE 200
CLEVELAND, OH 44124

Effective Date: 10/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ANCORA ALTERNATIVES LLC is under common control with the firm.

CRD #: 311902

Business Address: 6060 PARKLAND BOULEVARD
SUITE 200
CLEVELAND, OH 44124

Effective Date: 10/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ALPHA ASSET MANAGEMENT PTY LTD is under common control with the firm.

Business Address: SUITE 15, LEVEL 2, 432 CHAPEL ROAD
BANKSTOWN, AUSTRALIA NSW 2200

Effective Date: 07/01/2021

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

INVERNESS SECURITIES, LLC is under common control with the firm.

CRD #: 129914

Business Address: 6060 PARKLAND BOULEVARD
SUITE 200
CLEVELAND, OH 44124

Firm Operations



Organization Affiliates (continued)

Effective Date: 10/01/2021
Foreign Entity: No
Country:
Securities Activities: Yes
Investment Advisory Activities: No
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ANCORA ADVISORS LLC is under common control with the firm.

CRD #: 124674
Business Address: 6060 PARKLAND BOULEVARD
 SUITE 200
 MAYFIELD HEIGHTS, OH 44124
Effective Date: 10/01/2021
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FLINT HILLS FCCIII GP, LLC is under common control with the firm.

Business Address: 2820 ROSS TOWER
 500 NORTH AKARD STREET
 DALLAS, TX 75201
Effective Date: 04/08/2020
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

Firm Operations



Organization Affiliates (continued)

FLINT HILLS DOFV GP, LLC is under common control with the firm.

Business Address:	2820 ROSS TOWER 500 NORTH AKARD STREET DALLAS, TX 75201
Effective Date:	04/08/2020
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CONNECTUS AFSL LTD is under common control with the firm.

Business Address:	LEVEL 1, 170 ROBERTSON STREET FORTITUDE VALLEY,, AUSTRALIA 4006
Effective Date:	05/14/2016
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FOCUS PARTNERS FINANCIAL PLANNING PTY LTD is under common control with the firm.

Business Address:	LEVEL 1, 170 ROBERTSON STREET FORTITUDE VALLEY,, AUSTRALIA 4006
Effective Date:	05/04/2016
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

UPINVEST PTY LTD is under common control with the firm.

Business Address: LEVEL 1, 170 ROBERTSON STREET
FORTITUDE VALLEY,, AUSTRALIA 4006

Effective Date: 05/14/2016

Foreign Entity: No

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

UPINVEST NOMINEES PTY LTD is under common control with the firm.

Business Address: LEVEL 1, 170 ROBERTSON STREET
QUEENSLAND
FORTITUDE VALLEY,, AUSTRALIA 4006

Effective Date: 05/04/2016

Foreign Entity: No

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

TELEMUS LIFE SCIENCE REAL ESTATE FUND MANAGER, LLC is under common control with the firm.

Business Address: TWO TOWNE SQUA
SUITE 800
SOUTHFIELD, MI 48076

Effective Date: 07/13/2020

Foreign Entity: No

Country:

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SEASONS OF ADVICE WEALTH MANAGEMENT is under common control with the firm.

CRD #: 310448

Business Address: 120 WEST 45TH STREET
14TH FLOOR
NEW YORK, NY 10036

Effective Date: 11/01/2020

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

MEDIQ WEALTH SERVICES PTY LTD is under common control with the firm.

Business Address: SUITE 3, LEVEL 1
71 QUEENS ROAD
MELBOURNE, AUSTRALIA VIC 3004

Effective Date: 05/01/2020

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

MEDIQ FINANCIAL PLANNING PTY LTD is under common control with the firm.

Business Address: SUITE 3, LEVEL 1
71 QUEENS ROAD
MELBOURNE, AUSTRALIA VIC 3004

Effective Date: 05/01/2020

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

MEDIQ CAPITAL PTY LTD is under common control with the firm.

Business Address:	SUITE 3, LEVEL 1 71 QUEENS ROAD MELBOURNE, AUSTRALIA VIC 3004
Effective Date:	05/01/2020
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

LINK FINANCIAL SERVICES PTY LTD is under common control with the firm.

Business Address:	205 BALACLAVA ROAD LEVEL 2, CAULFIELD NORT, ENGLAND VIC 3161
Effective Date:	12/01/2020
Foreign Entity:	Yes
Country:	ENGLAND
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

KAVAR CAPITAL PARTNERS is under common control with the firm.

CRD #:	311744
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Firm Operations



Organization Affiliates (continued)

Business Address: 11460 TOMAHAWK CREEK PARKWAY
SUITE 420
LEAWOOD, KS 66211

Effective Date: 12/31/2020

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

HOWARD CAPITAL MANAGEMENT GROUP, LLC is under common control with the firm.

CRD #: 310510

Business Address: 11601 WILSHIRE BLVD.
SUITE 2000
LOS ANGELES, CA 90025

Effective Date: 12/01/2020

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

HILL INVESTMENT GROUP is under common control with the firm.

CRD #: 312052

Business Address: 7701 FORSYTH BOULEVARD
SUITE 350
ST. LOUIS, MO 63105

Effective Date: 03/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FAIRWAY WEALTH MANAGEMENT LLC is under common control with the firm.

CRD #: 311031

Business Address: 6055 ROCKSIDE WOODS BLVD.
SUITE 330
INDEPENDENC, OH 44131

Effective Date: 12/01/2020

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ESCALA WEALTH MANAGEMENT PTY LTD is under common control with the firm.

Business Address: LEVEL 19, 90 COLLINS STREET
MELBOURNE, AUSTRALIA VIC 3000

Effective Date: 04/01/2019

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CORNERSTONE PARTNERS is under common control with the firm.

CRD #: 311296

Business Address: 675 PETER JEFFERSON PARKWAY
SUITE 400
CHARLOTTESVILLE, VA 10162

Firm Operations



Organization Affiliates (continued)

Effective Date: 12/01/2020
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CONNECTUS WEALTH MANAGEMENT LIMITED is under common control with the firm.

Business Address: 85 KING STREET
KNITSFORD, ENGLAND WA166DX
Effective Date: 02/01/2021
Foreign Entity: Yes
Country: ENGLAND
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

BRADY & ASSOCIATES PTY. LTD is under common control with the firm.

Business Address: LEVEL 8, 17 CASTLEREAGH STREET
SYDNEY, AUSTRALIA NSW 2000
Effective Date: 12/01/2020
Foreign Entity: Yes
Country: AUSTRALIA
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING LLC

VESTOR CAPITAL, LLC is under common control with the firm.

CRD #: 165855

Firm Operations



Organization Affiliates (continued)

Business Address: 10 S. RIVERSIDE PLAZA
10 S. RIVERSIDE PLAZA
CHICAGO, IL 60606-3840

Effective Date: 10/23/2020

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING LLC

WILLIAMS JONES WEALTH MANAGEMENT, LLC is under common control with the firm.

CRD #: 301925

Business Address: 717 FIFTH AVENUE
11TH FLOOR
NEW YORK, NY 10022

Effective Date: 08/01/2019

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON
CONTROL WITH FOCUS
OPERATING, LLC

SOUND VIEW WEALTH ADVISORS GROUP, LLC is under common control with the firm.

CRD #: 300927

Business Address: 1 SKIDAWAY VILLAGE WALK
SUITE 201
SAVANNAH, GA 31411

Effective Date: 04/01/2019

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON
CONTROL WITH FOCUS
OPERATING, LLC

NEXUS INVESTMENT MANAGEMENT ULC is under common control with the firm.

Business Address: 111 RICHMOND STREET WEST
SUITE 801
TORONTO, CANADA M5H 2G4

Effective Date: 02/01/2020

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON
CONTROL WITH FOCUS
OPERATING, LLC

FOSTER DYKEMA CABOT & PARTNERS, LLC is under common control with the firm.

CRD #: 300282

Business Address: 1075 MAIN STREET
SUITE 200
WALTHAM, MA 02451

Effective Date: 03/01/2019

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON

Firm Operations



Organization Affiliates (continued)

CONTROL WITH FOCUS
OPERATING, LLC

FDC & PARTNERS MANAGER IV, LLC is under common control with the firm.

Business Address: 1075 MAIN STREET
SUITE 200
WALTHAM, MA 02451

Effective Date: 03/01/2019

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON
CONTROL WITH FOCUS
OPERATING, LLC

FDC & PARTNERS MANAGER III, LLC is under common control with the firm.

Business Address: 1075 MAIN STREET
SUITE 200
WALTHAM, MA 02451

Effective Date: 03/01/2019

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FDC & PARTNERS MANAGER II, LLC is under common control with the firm.

Business Address: 1075 MAIN STREET
SUITE 200
WALTHAM, MA 02451

Effective Date: 03/01/2019

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FDC & PARTNERS MANAGER I, LLC is under common control with the firm.

Business Address: 1075 MAIN STREET
SUITE 200
WALTHAM, MA 02451

Effective Date: 03/01/2019

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ESCALA PARTNERS LIMITED is under common control with the firm.

Business Address: LEVEL19, 90 COLLINS ST
MELBOURNE, AUSTRALIA VIC 3000

Effective Date: 04/01/2019

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

XML SECURITIES is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

CRD #: 145589

Business Address: 6901 ROCKLEDGE DRIVE
SUITE 730
BETHESDA, MD 20817

Effective Date: 10/01/2007

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

CAMPBELL DEEGAN FINANCIAL is under common control with the firm.

CRD #: 293020

Business Address: 8730 STONY POINT PARKWAY
SUITE 100
RICHMOND, VT 23235

Effective Date: 04/01/2019

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

BARTLETT & CO. WEALTH MANAGEMENT LLC is under common control with the firm.

CRD #: 292246

Business Address: 600 VINE STREET
SUITE 2100
CINCINNATI, OH 45202

Effective Date: 04/01/2018

Foreign Entity: No

Country:

Firm Operations



Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SCS PRIVATE EQUITY VI GP LLC is under common control with the firm.

Business Address:	888 BOYLSTON STREET SUITE 1010 BOSTON, MA 02199
Effective Date:	07/03/2017
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SCS PRIVATE CO-INVESTMENT OPPORTUNITIES GP LLC is under common control with the firm.

Business Address:	888 BOYLSTON STREET SUITE 1010 BOSTON, MA 02199
Effective Date:	07/03/2017
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

KRE MANAGER, LLC is under common control with the firm.

Business Address:	71 S WACKER DRIVE SUITE 1860 CHICAGO, IL 60606
Effective Date:	01/01/2016

Firm Operations



Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FOCUS PARTNERS AUSTRALIA WEALTH PTY LTD is under common control with the firm.

Business Address:	128 BUNDALL ROAD SUITE 4003 BUNDALL QLD, AUSTRALIA 4217
Effective Date:	05/01/2017
Foreign Entity:	Yes
Country:	AUSTRALIA
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

ASSET ADVISORS is under common control with the firm.

CRD #:	297305
Business Address:	2814-A HILLCREEK DRIVE AUGUSTA, GA 30909
Effective Date:	07/01/2018
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SCS PRIVATE EQUITY V GP LLC is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

Business Address: 888 BOYLSTON STREET
SUITE 1010
BOSTON, MA 02199

Effective Date: 07/03/2017

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

SCS CAPITAL MANAGEMENT LLC is under common control with the firm.

CRD #: 122258

Business Address: 888 BOYLSTON STREET
SUITE 1010
BOSTON, MA 02199

Effective Date: 07/03/2017

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

FOCUS PARTNERS AFSL PTY LTD is under common control with the firm.

Business Address: 140 BUNDALL ROAD
GROUND FLOOR
GOLD COAST QLD, AUSTRALIA 4217

Effective Date: 05/01/2017

Foreign Entity: Yes

Country: AUSTRALIA

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

FORTEM FINANCIAL GROUP, LLC is under common control with the firm.

CRD #: 291662

Business Address: 44801 VILLAGE COURT
SUITE 201
PALM DESERT, CA 92260

Effective Date: 02/01/2018

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

ETON ADVISORS is under common control with the firm.

CRD #: 289395

Business Address: 301 W BARBEE CHAPEL ROAD
SUITE 303
CHAPEL HILL, NC 27517

Effective Date: 09/01/2017

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

CORNERSTONE WEALTH is under common control with the firm.

CRD #: 289971

Business Address: 16810 KENTON DRIVE

Firm Operations



Organization Affiliates (continued)

SUITE 200
HUNTERSVILLE, NC 28078

Effective Date: 01/01/2018

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

BORDEAUX WEALTH ADVISORS is under common control with the firm.

CRD #: 287758

Business Address: 1550 EL CAMINO REAL
SUITE 100
MENLO PARK, CA 94025

Effective Date: 03/01/2017

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

XML FINANCIAL GROUP is under common control with the firm.

CRD #: 284987

Business Address: 6901 ROCKLEDGE DRIVE
SUITE 730
BETHESDA, MD 20817

Effective Date: 10/01/2016

Foreign Entity: No

Country:

Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING LLC

WADDELL & ASSOCIATES, LLC is under common control with the firm.

CRD #: 283723

Business Address: 5188 WHEELIS DRIVE
MEMPHIS, TN 38117

Effective Date: 04/01/2016

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING LLC

TELEMUS DECCORRELATION OPPORTUNITY GP, LLC is under common control with the firm.

Business Address: TWO TOWNE SQUARE
SUITE 800
SOUTHFIELD, MI 48076

Effective Date: 03/01/2016

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING LLC

ONE CHARLES PRIVATE WEALTH is under common control with the firm.

CRD #: 286635

Business Address: 99 DERBY STREET
SUITE 100
HINGHAM, MA 02043

Firm Operations



Organization Affiliates (continued)

Effective Date: 02/01/2017
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING LLC

CRESTWOOD ADVISORS is under common control with the firm.

CRD #: 286243
Business Address: ONE LIBERTY SQUARE
 SUITE 500
 BOSTON, MA 286243
Effective Date: 01/01/2017
Foreign Entity: No
Country:
Securities Activities: Yes
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING LLC

CFO4LIFE is under common control with the firm.

CRD #: 287600
Business Address: 735 PLAZA BOULEVARD
 SUITE 100
 COPPELL, TX 75019
Effective Date: 02/01/2017
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING LLC

KOVITZ INVESTMENT GROUP PARTNERS, LLC is under common control with the firm.

CRD #: 282241

Business Address: 71 S WACKER DRIVE
SUITE 1860
CHICAGO, IL 60606

Effective Date: 01/01/2016

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

DOUGLAS C. LANE & ASSOCIATES is under common control with the firm.

CRD #: 282563

Business Address: 885 SECOND AVENUE
42TH FLOOR
NEW YORK, NY 10017

Effective Date: 01/01/2016

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

COLONY FUNDS, LLC is under common control with the firm.

Business Address: TWO ATLANTIC AVENUE
BOSTON, MA 02110

Effective Date: 10/01/2011

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:
Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

PATTON ALBERTSON MILLER GROUP, LLC is under common control with the firm.
CRD #: 281558

Business Address: 605 CHESTNUT STREET,
SUITE 900
CHATTANOOGA, TN 37450

Effective Date: 10/20/2015

Foreign Entity: No

Country:
Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

QUADRANT PRIVATE WEALTH MANAGEMENT, LLC is under common control with the firm.
CRD #: 277044

Business Address: 3850 SIERRA CIRCLE
3RD FLOOR
CENTER VALLEY, PA 18034

Effective Date: 07/01/2015

Foreign Entity: No

Country:
Securities Activities: Yes

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

THE FIDUCIARY GROUP is under common control with the firm.

Firm Operations



Organization Affiliates (continued)

CRD #: 221530
Business Address: 310 COMMERCIAL DRIVE
 SAVANNAH, GA 34106
Effective Date: 05/13/2015
Foreign Entity: No
Country:
Securities Activities: No
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FOUNDATION INVESTMENT MANAGEMENT LIMITED is under common control with the firm.

Business Address: FOUNDATION HOUSE
 SCOTT DRIVE
 ALTRINCHAM/CHESHIRE, UNITED KINGDOM WA158AB
Effective Date: 09/09/2011
Foreign Entity: Yes
Country: UNITED KINGDOM
Securities Activities: Yes
Investment Advisory Activities: Yes
Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SUMMIT FINANCIAL WEALTH ADVISORS is under common control with the firm.

CRD #: 171278
Business Address: 1021 E. SAINT MARY BOULEVARD
 LAFAYETTE, LA 70503
Effective Date: 04/01/2014
Foreign Entity: No
Country:
Securities Activities: No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

LAFLEUR & GODFREY PRIVATE WEALTH MANAGEMENT is under common control with the firm.

CRD #: 168831

Business Address: 625 KENMOOR AVENUE SE
SUITE 209
GRAND RAPIDS, MI 49545

Effective Date: 08/01/2013

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

THE PORTFOLIO STRATEGY GROUP, LLC is under common control with the firm.

CRD #: 166593

Business Address: 50 MAIN STREET
SUITE 1280
WHITE PLAINS, NY 10606

Effective Date: 12/31/2012

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SAPIENT PRIVATE WEALTH MANAGEMENT, LLC is under common control with the firm.

CRD #: 159419

Business Address: 101 E. BROADWAY

Firm Operations



Organization Affiliates (continued)

STE. 480
EUGENE, OR 97401

Effective Date: 09/30/2011

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

LVW ADVISORS, LLC is under common control with the firm.

CRD #: 159403

Business Address: 67 MONROE AVENUE
PITTSFORD, NY 14534-1319

Effective Date: 10/11/2011

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FOCUS PARTNERS WEALTH, LLC is under common control with the firm.

Business Address: THE COLONY GROUP, LLC
TWO ATLANTIC AVENUE
BOSTON, MA 02110

Effective Date: 09/01/2011

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

PETTINGA FINANCIAL ADVISORS, LLC is under common control with the firm.

CRD #: 156369

Business Address: 501 MAIN STREET
SUITE 100
EVANSVILLE, IN 47708

Effective Date: 01/11/2011

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

GREYSTONE FINANCIAL SERVICES, LTD is under common control with the firm.

Business Address: FOUNDATION HOUSE
SCOTT DRIVE
ALTRINCHAM/CHESHIRE, UNITED KINGDOM WA158AB

Effective Date: 04/01/2008

Foreign Entity: Yes

Country: UNITED KINGDOM

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

COASTAL BRIDGE ADVISORS is under common control with the firm.

CRD #: 152569

Business Address: 33 RIVERSIDE AVENUE
WESTPORT, CT 06880

Effective Date: 12/01/2009

Foreign Entity: No

Firm Operations



Organization Affiliates (continued)

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

STRATEGIC POINT INVESTMENT ADVISORS LLC is under common control with the firm.

CRD #: 124636

Business Address: 220 WEST EXCHANGE STREET
SUITE 300A
PROVIDENCE, RI 02903

Effective Date: 01/02/2007

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

JOEL ISAACSON & CO., LLC is under common control with the firm.

CRD #: 152450

Business Address: 546 FIFTH AVENUE
NEW YORK, NY 10036

Effective Date: 11/01/2009

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

FOCUS PARTNERS ADVISOR SOLUTIONS, LLC is under common control with the firm.

CRD #: 143319

Firm Operations



Organization Affiliates (continued)

Business Address: 8182 MARYLAND AVENUE
SUITE 900
ST LOUIS, MO 63105

Effective Date: 02/01/2007

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

WESPAC ADVISORS, LLC is under common control with the firm.

CRD #: 148242

Business Address: 4 ORINDA WAY
SUITE 100-B
ORINDA, CA 14824

Effective Date: 07/01/2008

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

BENEFIT FINANCIAL SERVICES GROUP is under common control with the firm.

CRD #: 143617

Business Address: 2040 MAIN STREET
SUITE 720
IRVINE, CA 92614

Effective Date: 03/01/2007

Foreign Entity: No

Country:

Firm Operations



Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

JFS WEALTH ADVISORS, LLC is under common control with the firm.

CRD #:	145051
Business Address:	1479 N. HERMITAGE ROAD HERMITAGE, PA 16148
Effective Date:	08/01/2007
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC

SENTINEL PENSION ADVISORS, LLC. is under common control with the firm.

CRD #:	109901
Business Address:	100 QUANNAPOWITT PKY SUITE 300 WAKEFIELD, MA 01880
Effective Date:	02/13/2001
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	UNDER COMMON CONTROL WITH FOCUS OPERATING, LLC.

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank

Firm Operations



Organization Affiliates (continued)

- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	1	0



Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
 - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source: Regulator

Current Status: Final



Allegations: FAILURE TO REASONABLY SUPERVISE AN EMPLOYEE/REGISTERED AGENT OF THE FIRM.

Initiated By: MASSACHUSETTS SECURITIES DIVISION

Date Initiated: 10/30/2013

Docket/Case Number: 2012-0054

URL for Regulatory Action:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 10/30/2013

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Sanctions Ordered: Censure
Monetary/Fine \$50,000.00
Cease and Desist/Injunction

Other Sanctions Ordered: ORDER REQUIRED RESPONDENT SENTINEL SECURITIES, INC. TO CERTIFY IN WRITING TO THE DIVISION THAT, AMONG OTHER THINGS, THE FIRM'S POLICIES AND PROCEDURES WERE ENHANCED.

Sanction Details: NO PORTION OF THE FINE WAS WAIVED.

Reporting Source: Firm

Current Status: Final

Allegations: FAILURE TO REASONABLY SUPERVISE AN EMPLOYEE/REGISTERED AGENT OF THE FIRM.

Initiated By: MASSACHUSETTS SECURITIES DIVISION

Date Initiated: 10/30/2013



Docket/Case Number:	2012-0054
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	10/30/2013
Sanctions Ordered:	Censure Monetary/Fine \$50,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	ORDER REQUIRED RESPONDENT SENTINEL SECURITIES INC. TO CERTIFY IN WRITING TO THE DIVISION THAT, AMONG OTHER THINGS, THE FIRM'S POLICIES AND PROCEDURES WERE ENHANCED.
Sanction Details:	NO PORTION OF THE FINE WAS WAIVED
Firm Statement	THE FIRM DISCOVERED THAT ONE EMPLOYEE HAD MISAPPROPRIATED FIRM FUNDS (PLEASE NOTE THAT NO CLIENT FUNDS WERE EVER COMPROMISED). THE FIRM IMMEDIATELY TERMINATED THE EMPLOYMENT OF THE INDIVIDUAL, SOUGHT LEGAL ACTION AGAINST THE INDIVIDUAL, AND SELF-REPORTED THE INCIDENT TO ALL APPLICABLE SELF-REGULATORY ORGANIZATIONS. WITHOUT ADMITTING OR DENYING THE ALLEGATIONS BY THE MASSACHUSETTS STATE SECURITIES DIVISION, THE FIRM AGREED TO BE CENSURED AND PAY A ADMINISTRATIVE FINE OF \$50,000.

End of Report



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