

## Item 1: Introduction

Focus Partners Wealth, LLC (“Focus Partners”) is an investment advisory firm registered with the U.S. Securities and Exchange Commission. We provide advisory, not brokerage services, and it is important for you to understand the differences between them as well as how their fees differ. Note that free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about broker-dealers, RIAs, and investing.

## Item 2: Relationship and Services

### What investment services and advice can you provide to me?

Typical services offered to our retail clients are investment management and financial counseling. Financial counseling generally consists of financial and related planning around tax, retirement, estate, cash flow, philanthropy, risk management, and education and may include tax return preparation. Investment management includes the discretionary management of clients’ investment portfolios. Based on each client’s objectives, risk tolerance, time horizon, reasonable restrictions, and other unique circumstances, we construct a portfolio that can include equity and fixed income strategies, mutual funds and ETFs, alternative investments, and sub-advised solutions. Some investments include our affiliated mutual funds and/or ETF, and for eligible investors, our private investment funds. We also may manage portfolios on a non-discretionary basis, where we provide advice and recommendations, but the client ultimately decides on the investments. We do not hold clients’ assets. We generally are provided with a limited power of attorney to place securities transactions through unaffiliated broker-dealer custodians that hold our clients’ accounts. We monitor securities in clients’ portfolios on an ongoing basis and provide reports about activity, balances, and performance. We do not impose a minimum for investment management services but have guidelines with respect to minimum portfolio size for certain strategies.

For additional information, please refer to our [ADV Part 2A brochure](#), especially **Item 4 (Advisory Services)**, **Item 7 (Types of Clients)**, **Item 8 (Methods of Analysis, Investment Strategies and Risk of Loss)**, **Item 13 (Review of Accounts)**, and **Item 16 (Investment Discretion)**.

#### Conversation Starters/Ask Us:

- “Given my financial situation, should I choose an investment advisory service? Why or why not?”
- “How will you choose investments to recommend to me?”
- “What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?”

## Item 3: Fees, Costs, Conflicts, and Standard of Conduct

### What fees will I pay?

Our standard investment management fee schedule is simple, transparent, and based on a percentage of the assets managed. Our fee is typically calculated and paid quarterly. While the marginal rate decreases when certain asset levels are reached, we are incented to grow your portfolio in alignment with your objectives and to encourage you to increase managed assets. In addition to our fee, you will incur other fees and expenses associated with the management of your portfolio, including brokerage commissions, wire fees, and other transaction fees charged by your custodian. Some investments – such as mutual funds and ETFs, private investments, and separate account managed solutions – have their own built-in fees and expenses for which clients are responsible. **You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.**

Fees for comprehensive financial counseling services vary and are based on the scope of engagement and complexity of the work. Generally, it is a flat fee negotiated between the client and their wealth advisor. The fee and scope of engagement is memorialized in an advisory agreement. For additional details about fees and expenses, please refer to **Item 5 (Fees and Compensation)** of our [ADV Part 2A brochure](#).

#### Conversation Starters/Ask Us:

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

## What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interests do you have?

When we act as your investment advisor, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. Here are some examples to help you understand what this means:

- **Custodians** – We receive various benefits, including soft dollars and client referrals, from certain custodians. Receiving benefits has the potential to influence our recommendation to clients to use certain custodians over others.
- **Margin Accounts** – Clients allowing margin in the management of their accounts will be billed on the assets under management, which are not reduced by any indebtedness of the account. This creates a conflict because we have an incentive to recommend that clients allow margin on their accounts rather than selling securities outright for their cash needs.
- **Solicitors** – We have agreements in place with unaffiliated firms and individuals to refer clients to us in exchange for a portion of the advisory fee we collect from such clients or a fee based on the assets we manage for them. This creates a conflict because solicitors have an incentive to make referrals to us.
- **Industry Conferences** – We may receive financial support for conference participation in the form of reduced fees, travel/meals, and related expenses from financial industry sponsors such as mutual fund companies. This creates a conflict because we may have an incentive to select those sponsors' funds for inclusion in our clients' portfolios.

For more information about conflicts, and how we address them, please refer to our ADV Part 2A brochure.

### Conversation Starters/Ask Us:

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

## How do your financial professionals make money?

Our financial professionals are compensated through salary, bonus, and/or a share of our firm's profits. A portion of that compensation typically is correlated to the amount of client assets they service, the revenue our firm earns from clients, and/or whether the financial professional has increased client assets under our management. We and our affiliates can refer clients to affiliated and unaffiliated third party service providers, and are eligible to receive additional compensation for revenues generated through those referrals. Some financial professionals may be compensated by our indirect parent company, Focus Financial Partners, LLC (or one of its affiliates), based on our firm's revenues or earnings. This gives the financial professional an incentive to encourage you to increase the size of your investment portfolio that we manage and/or recommend certain products or services offered by our affiliates, including those from insurance agencies. For additional information, please refer to Item 5 of your financial professional's ADV Part 2B brochure supplement.

## Item 4: Do you or your financial professionals have legal or disciplinary history?

No for our firm. Yes for our professionals. Please go to [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool to research our firm and our firm's financial professionals.

### Conversation Starters/Ask Us:

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

## Item 5: Additional Information

For additional information about our investment advisory services, and to request a copy of Form CRS, please contact us at (617) 723-8200 or [fpwcompliance@focuspartners.com](mailto:fpwcompliance@focuspartners.com)

### Conversation Starters/Ask Us:

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