

**FORM ADV PART 2A  
BROCHURE**

**CONNECTUS WEALTH, LLC  
Firm Brochure for DBA (“doing business as”)  
NORTHCOAST ASSET MANAGEMENT**

**20 Wight Avenue, #155  
Hunt Valley, MD 21030  
410-494-4380**

**Item 1 – Cover Page**

**March 28, 2024**

This Form ADV Part 2A brochure (“Brochure”) provides information about the qualifications, business practices and nature of advisory services of Connectus Wealth, LLC, specifically “doing business as” NorthCoast Asset Management. If you have any questions about the contents of this brochure, please contact Chief Compliance Officer Andy Warning at 513-832-5463. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about our firm also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

You should be aware that Connectus Wealth, LLC is registered as a Registered Investment Adviser with the SEC. Registration does not imply that an investment adviser has reached a certain level of skill or training.

## **Item 2 – Material Changes**

In this section, we summarize material changes to the Brochure made in or subsequent to our most recent annual updating amendment.

Per this other than annual amendment dated March 28, 2024, we are disclosing the following updates:

Item 8- Methods of Analysis, Investment Strategies and Risk of Loss: Certain strategies have been re-named. This section contains the updated strategy names and descriptions.

Per this annual amendment dated March 26, 2024, we are disclosing the following changes:

Disclosure of Pontera Solutions, Inc. which is a system used for management of client held away accounts. Please see further information provided in Items 4 and 5.

On August 31, 2023, investment vehicles affiliated with Clayton, Dubilier & Rice, LLC (“CD&R”) and Stone Point Capital LLC (“Stone Point”) indirectly acquired Focus Financial Partners Inc. (“Focus Inc.”). This transaction resulted in investment vehicles affiliated with CD&R collectively becoming majority owners of Focus Financial Partners, LLC (“Focus LLC”) and investment vehicles affiliated with Stone Point collectively becoming owners of Focus LLC. Because Connectus is an indirect, wholly-owned subsidiary of Focus LLC, the CD&R and Stone Point investment vehicles are indirect owners of Connectus. Items 4 and 10 have been revised to reflect this new ownership structure.

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions through UPTIQ Treasury & Credit Solutions, LLC (together with UPTIQ, Inc. and its affiliates, “UPTIQ”) and Flourish Financial LLC (“Flourish”). UPTIQ is compensated by sharing in the revenue earned by such third-party institutions for serving our clients. When legally permissible, UPTIQ and Flourish each shares a portion of this earned revenue with an affiliate of our firm. The affiliate distributes this revenue to us when we are licensed to receive such revenue (or when no such license is required) and the distribution is not otherwise legally prohibited. Further information on this conflict of interest is available in Items 4, 5, and 10 of this Brochure.

Clients are encouraged to review the Brochure in its entirety.

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#### **Item 4 – Investment Advisory Business**

Connectus Wealth, LLC (“Connectus” or the “Firm”) is an SEC registered investment adviser. Connectus’ registration as an investment adviser does not imply a certain level of skill or training.

The oral and written communications that the Firm provides to you, including this Brochure, is information that you should use in your decision to hire the Firm or continue a professional relationship with the Firm.

Connectus has multiple divisions that advise clients according to different service models. This Brochure provides specific information relating to the division of Connectus that does business as NorthCoast Asset Management (“NorthCoast”). Connectus provides asset management to multiple client types through various service models, including but not limited to NorthCoast’s model. Connectus maintains and delivers to clients a brochure applicable to the service model those clients receive. In this case, clients of NorthCoast receive a separate brochure tailored specifically to the provision of investment advisory services to such clients by NorthCoast.

Connectus is part of the Focus Financial Partners, LLC (“Focus LLC”) partnership. Specifically, Connectus is a wholly-owned indirect subsidiary of Focus LLC. Ferdinand FFP Acquisition, LLC is the sole managing member of Focus LLC. Ultimate governance of Focus LLC is conducted through the board of directors at Ferdinand FFP Ultimate Holdings, LP. Focus LLC is majority-owned, indirectly and collectively, by investment vehicles affiliated with Clayton, Dubilier & Rice, LLC (“CD&R”). Investment vehicles affiliated with Stone Point Capital LLC (“Stone Point”) are indirect owners of Focus LLC. Because Connectus is an indirect, wholly-owned subsidiary of Focus LLC, CD&R and Stone Point investment vehicles are indirect owners of Connectus.

Focus LLC also owns other registered investment advisers, broker-dealers, pension consultants, insurance firms, business managers and other firms (the “Focus Partners”), most of which provide wealth management, benefit consulting and investment consulting services to individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or investment companies as disclosed on their respective Form ADVs.

Connectus is a consortium of advisers who provide customized investment advice through a series of independently operated brands.

We offer tax preparation services under the trade name Connectus Accountants. Please see Item 10 for further details.

The order management system that we use for held-away accounts is provided by Pontera Solutions, Inc. We review, monitor, and manage these held-away accounts in an integrated way with client accounts held at our clients’ primary custodian(s). Further information about this service is available in Item 5.

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions through UPTIQ Treasury & Credit Solutions, LLC (together with UPTIQ, Inc. and its affiliates, “UPTIQ”) and Flourish Financial LLC (“Flourish”). Please see Items 5 and 10 for a fuller discussion of these services and other important information.

We help our clients obtain certain insurance solutions from unaffiliated, third-party insurance brokers by introducing clients to our affiliate, Focus Risk Solutions, LLC (“FRS”), a wholly owned subsidiary of our parent company, Focus Financial Partners, LLC. Please see Items 5 and 10 for a fuller discussion of these services and other important information.

As of December 31, 2023, Connectus maintains \$8,537,464,270 in discretionary assets, of which \$137,005,738 are non-discretionary assets. The total AUM for Connectus is \$8,674,470,008.

NorthCoast helps clients reach their investment goals. Whether the client is a high net worth individual looking for a long-term financial plan, or an institutional client interested in a particular set of strategy risk/return attributes, NorthCoast provides portfolio management services via separately managed accounts.

NorthCoast is a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”) with respect to investment management services and investment advice provided to ERISA plan clients, including plan participants. NorthCoast is also a fiduciary under section 4975 of the Internal Revenue Code (the “IRC”) with respect to investment management services and investment advice provided to individual retirement accounts (“IRAs”), ERISA plans, and ERISA plan participants. As such, NorthCoast is subject to specific duties and obligations under ERISA and the IRC that include, among other things, prohibited transaction rules which are intended to prohibit fiduciaries from acting on conflicts of interest. When a fiduciary gives advice in which it has a conflict of interest, the fiduciary must either avoid or eliminate the conflict or rely upon a prohibited transaction exemption (a “PTE”).

As a fiduciary, we have duties of care and of loyalty to you and are subject to obligations imposed on us by the federal and state securities laws. As a result, you have certain rights that you cannot waive or limit by contract. Nothing in our agreement with you should be interpreted as a limitation of our obligations under the federal and state securities laws or as a waiver of any unwaivable rights you possess.

NorthCoast has subadvisory agreements with certain affiliates to offer access to certain of its strategies. Affiliates who choose to utilize NorthCoast strategies will take the appropriate steps to determine that the sub-advisor relationship is in the best interest of the client. Affiliates are under no obligation to use NorthCoast strategies.

Our philosophy driving this service model is that a thoroughly researched and systematic investment process grounded in common sense will outperform over time. NorthCoast specializes in quantitative analysis and systematic investing. Through our research, we have discovered that securities and markets reward certain factors and penalize others. To capitalize on these observations, we implement market exposure and security selection models based on the same fundamental rationales. These continue to be validated by thorough research, then implemented daily as part of our investment process.

## **Item 5 – Fees and Compensation**

### **Compensation and fees for individually managed accounts**

Our compensation for individually managed accounts is specified in our agreement with the relevant client. We charge fixed fees that we determine on a case-by-case basis after taking into account a variety of factors, such as the amount of client assets we have agreed to manage, and the variety and complexity of the services we are providing. Legacy clients pay the asset-based strategy fee that is specified in their client agreements with us. Our fees are potentially subject to negotiation.

For certain clients, we charge an advisory fee for services provided with respect to the held-away accounts mentioned above in Item 4, just as we do with client accounts held at our primary custodians.

The specific fee schedule charged by us is provided in the client's investment advisory agreement with us.

### **General Compensation Provisions**

Generally, NorthCoast charges management fees on a quarterly basis in arrears as provided in the investment advisory agreement. The fees are based on the net assets in the client's account as of the last business day of each calendar quarter. For purposes of calculating each such management fee, the net assets in a client's account are determined before reduction of the management fee and accrued or payable as of the calculation date and before any additions or withdrawals. Cash, accrued interest and the value of securities purchased on margin are included for billing purposes, unless the Firm determines otherwise, in its discretion.

If a client withdraws all or part of its funds under management, or the agreement with us is terminated on any other date than the last business day of a calendar month or quarter, that client will be charged a management fee which will be prorated. The proration will be based on (a) the number of business days in the calendar month or quarter through the date of termination to (b) the total number of business days in the calendar month or quarter.

If a client enters into an agreement with us mid-quarter, that client will be charged a management fee which will be prorated. The proration will be based on (a) the number of days remaining in the calendar month or quarter to (b) the total number of days in the calendar month or quarter.

For certain legacy clients, we charge asset-based strategy fees. We charge a higher rate for client assets invested in some strategies than we do for others. Charging a different rate for client investments based on the strategy the client is invested in gives us an incentive to allocate client assets to strategies where we receive higher fees. We mitigate this conflict by disclosing it to you and by adhering to our duty to recommend strategies that are in the best interests of our clients. In addition, we will not change the allocation of your portfolio to a strategy that increases your fees without obtaining your consent.

NorthCoast also manages accounts that are part of "wrap fee" programs (in which the advisory fee is inclusive of portfolio trading costs) sponsored by other brokerage or asset management firms with whom NorthCoast has selling agreements or dual contracts. NorthCoast may opt to negotiate lower fees in order to participate in these programs. NorthCoast does not sponsor its own wrap fee program. If needed, NorthCoast has the ability to place orders with brokers or dealers other than the wrap program's sponsor ("trading away"). In these instances, brokers or dealers will impose mark-ups/mark-downs on those orders that are charged to the client's account within the execution price. These are not included in the wrap fees paid by the client to the wrap program's sponsor. This would occur in rare cases in which the additional cost to the client remains consistent with NorthCoast's duty to seek best execution.

NorthCoast bills on an "in arrears" basis. However, several brokerage firms offering our products bill on a forward basis. They include UBS, Pershing, Raymond James, and Oppenheimer.

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions through UPTIQ Treasury & Credit Solutions, LLC (together with UPTIQ, Inc. and its affiliates, "UPTIQ") and Flourish Financial LLC ("Flourish"). Focus Financial Partners, LLC ("Focus") is a minority investor in UPTIQ, Inc. UPTIQ is compensated by sharing in the revenue earned by such third-party financial institutions for serving our clients. The revenue paid to UPTIQ also benefits UPTIQ Inc.'s investors, including Focus, our parent company. When legally

permissible, UPTIQ also shares a portion of this earned revenue with our affiliate, Focus Solutions Holdings, LLC (“FSH”). For non-residential mortgage loans made to our clients, UPTIQ will share with FSH up to 25% of all revenue it receives from such third-party financial institutions. For securities-backed lines of credit (“SBLOCs”) made to our clients, UPTIQ will share with FSH up to 75% of all revenue it receives from such third-party financial institutions. For cash management products and services provided to our clients, UPTIQ will share with FSH up to 33% of all revenue it receives from the third-party financial institutions and other intermediaries that provide administrative and settlement services in connection with this program. As noted above, Flourish facilitates cash management solutions for our clients. When legally permissible, Flourish pays FSH a revenue share of up to 0.10% of the total amount of cash held in Flourish cash accounts by our clients. This earned revenue is indirectly paid by our clients through an increased interest rate charged by the third-party financial institutions or, for cash balances, a lowered yield. FSH distributes this revenue to us when we are licensed to receive such revenue (or when no such license is required) and the distribution is not otherwise legally prohibited. Further information on this conflict of interest is available in Item 10 of this Brochure.

We help our clients obtain certain insurance solutions from unaffiliated, third-party insurance brokers by introducing clients to our affiliate, Focus Risk Solutions, LLC (“FRS”), a wholly owned subsidiary of our parent company, Focus Financial Partners, LLC. FRS has arrangements with certain third-party insurance brokers (the “Brokers”) under which the Brokers assist our clients with regulated insurance sales activity. If FRS refers one of our clients to a Broker and there is a subsequent purchase of insurance through the Broker, then FRS will receive a portion of the upfront and/or ongoing commissions paid to the Broker by the insurance carrier with which the policy was placed. The amount of revenue earned by FRS for the sale of these insurance products will vary over time in response to market conditions. The amount of insurance commission revenue earned by FRS is considered for purposes of determining the amount of additional compensation that certain of our financial professionals are entitled to receive. The amount of revenue earned by FRS for a particular insurance product will also differ from the amount of revenue earned by FRS for other types of insurance products. Further information on this conflict of interest is available in Item 10 of this Brochure.

#### **Item 6 - Performance-Based Fees and Side-By-Side Management**

NorthCoast does not receive performance-based fees on client accounts.

#### **Item 7 – Types of Clients**

NorthCoast may provide advisory services to individuals, investment companies, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, limited liability companies, general partnerships, and limited partnerships.

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

##### **Analysis, Investment Strategies and Risk of Loss**

#### **Investment Philosophy**

We believe a thoroughly researched and systematic investment process rooted in common sense will outperform over time. In our research, we have found that securities and markets reward certain factors and punish others.

To capitalize on these factors, we employ market exposure models and security selection models based on fundamental rationales. These rationales have been validated by thorough research and are implemented daily as part of our investment process. To maintain, refine and enhance our competitive edge, we remain committed to a continuous and comprehensive research process.

### **Monitoring and Research**

The investment process will be continuously monitored and augmented by a thorough, quantitatively based research effort. NorthCoast's proprietary market exposure models and security management models are updated daily with the latest data. Estimates of portfolio volatility and expected return are evaluated daily to confirm they are appropriately targeted. The Investment Team will confirm that risk factor and sector exposures are in line with risk budgets. Portfolio trading will be initiated only when required to enhance the risk-return profile of the portfolio and only after expected transaction costs are considered.

NorthCoast believes that to deliver superior risk adjusted returns over the long term requires a long-term information advantage. To maintain this edge, NorthCoast constantly engages in statistically based research to find new sources of alpha, improve portfolio construction and enhance its ability to forecast risk and return. Process enhancements are considered only after rigorous testing and after all potential implementation impacts are thoroughly evaluated.

NorthCoast conducts extensive research, paying particular attention to past bear markets, in developing our investment programs. However, NorthCoast can give no assurance that a particular client's account will achieve superior performance relative to other stock portfolios or indices.

### **Aggregation and Allocation of Trades**

In nearly all cases, NorthCoast aggregates client orders for the purchase or sale of the same securities at the same broker-dealer. NorthCoast will generally follow the guidelines set forth below in aggregating client orders for securities at the same broker-dealer:

- no investment advisory client will be favored over any other investment advisory client other than as permitted under the Aggregation and Allocation Policy;
- each client that participates in an aggregated order will participate at the average share price for all NorthCoast's transactions in that security at that client's broker on a given business day. Transaction costs will be based on each client's participation in the aggregated order;
- if the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the NorthCoast's standard order aggregation method;
- if the aggregated order is partially filled, it will be allocated among clients on a pro rata basis;

Notwithstanding the foregoing, an aggregated order may be allocated following execution on a basis different from that specified in NorthCoast's standard order aggregation method.

Reasons for allocation on a basis different from that specified in the NorthCoast's standard order



aggregation method may include: available cash; liquidity requirements; legal regulatory reasons, client restrictions, timing; or if the custodian offers asset-based pricing.

In some cases, NorthCoast may make purchases and sales in the same security on the same day. This may occur when a) multiple strategies are holding the same security and a specific strategy is rebalancing, b) an individual account is onboarding or liquidating. Generally, whole strategy changes will follow the process outlined above whereas trades in individual accounts for the purposes of onboarding or liquidation will occur as soon as feasible.

### **Investment Process**

NorthCoast will seek to exploit uncorrelated market inefficiencies by employing rigorous quantitative models based on fundamental investment insights and statistical analysis.

NorthCoast is committed to risk management and uses a combination of risk management techniques: sector/region exposures, security specific risk, market risk, multifactor risk model. This last model enables NorthCoast to forecast how the portfolio will react to changes in macroeconomic factors. This information allows the Investment Team to balance the exposure of one security against the exposure of another and to maintain statistically acceptable risk exposures.

Individual transaction cost estimates are taken into account. This enables NorthCoast to more accurately manage the expected risk-return profile of the strategies while appropriately considering liquidity costs in portfolio construction.

### **Investment Strategies**

#### *Description*

NorthCoast offers a broad suite of investment strategies designed to meet a diverse range of investor goals. From income to growth to alternative solutions, our dedicated advisory team works with each client to construct a portfolio that matches their profile, objectives and approach.

Our investment solutions can be divided into six broad categories covering the spectrum of investment styles: Strategic Asset Allocation, Equity, Income, Dynamic Asset Allocation, Options Strategies, and Alternatives.

### **Strategic Asset Allocation**

<b>Balanced</b>	The Balanced Strategy is an approach with the goal of generating long-term growth and income by allocating approximately 50% to stocks and 50% to bonds.
<b>Global Diversified Balanced</b>	Global Diversified Balanced is a moderately tactical investment strategy designed to produce a balanced approach to growth and income. The strategy invests in a diversified basket of global ETFs (global equities, global bonds, real estate, alternative investments, and cash equivalents) with a balanced objective of capital appreciation and income generation.
<b>Strategic Growth</b>	Strategic Growth is a moderately aggressive approach to producing long-term capital appreciation by allocating approximately 70% to stocks and 30% to bonds.

**Global Diversified Growth**

Global Diversified Growth is a moderately tactical investment strategy designed to produce long-term capital appreciation. The strategy invests in a diversified basket of global ETFs (global equities, global bonds, real estate, alternative investments, and cash equivalents) with a primary objective of capital appreciation and secondary objective of income generation.

**Aggressive Growth**

Aggressive Growth is a higher risk approach to producing long-term capital appreciation by allocating approximately 90% to stocks and 10% to bonds.

**Equity****Large-Cap Core**

Large-Cap Core is a long-term growth strategy focused on capital appreciation. In combination with a proprietary stock-scoring system, the strategy seeks stocks traditionally known as “blue-chips.” Blue chip companies are typically large, commonly known, financially sound, and have operated for many years. They tend to meet an economic need, boast a strong competitive advantage and have a long history of profitability.

**Large-Cap Growth**

Large-Cap Growth is a long-term growth strategy focused on capital appreciation. The goal is to generate significant capital appreciation over the long term by investing in growth-oriented, large-cap companies. These are typically organizations with a market capitalization of over \$10 billion that exhibit a potential for high earnings growth, above their peers, and display sustainable competitive advantages.

**Large-Cap Value**

Large-Cap Value is a strategic long-term value strategy focused on capital appreciation. The strategy aims to maintain a full investment in equity securities. The program is derived from the investment philosophies of three of the top professional money managers in history: Benjamin Graham, John Neff, and Joel Greenblatt. This approach is coupled with a proprietary stock scoring system designed to build a comprehensive value portfolio.

**All-Cap Core**

All-Cap Core is a strategic long-term growth strategy focused on capital appreciation. Utilizing a proprietary stock scoring system, the strategy seeks stocks with “growth-at-a-reasonable-price,” a style known as GARP. The strategy is grounded in its long-term growth objective and remains fully invested in equities throughout market cycles. The program actively searches for stocks that show consistent earnings growth above broad market levels while exhibiting attractive valuations and entry points.

**Global Country Select**

Global Country Select is an actively managed investment strategy designed to generate long-term growth. The strategy utilizes a proprietary scoring and selection process to actively allocate across global country ETFs. The strategy invests in countries with higher risk-adjusted return potential and reduces or eliminates exposure to countries with lower risk-adjusted return potential.

<b>SectorSelect</b>	Sector Select is an actively managed investment strategy designed to generate long-term growth. The strategy utilizes a proprietary scoring and selection process to actively allocate across U.S. sector ETFs. The strategy invests in sectors with higher risk-adjusted return potential and reduces or eliminates exposure to sectors with lower risk-adjusted return potential.
<b>Dividend Equity</b>	Dividend Equity is an income strategy based on Michael O’Higgins’ popular book, <i>Beating the Dow</i> . Dogs is grounded in the conventional wisdom that blue-chip companies will maintain a consistent dividend strategy that is independent of trading conditions. Though “Dog” stocks are often experiencing negative headlines, the strategy benefits by investing during times of stress with the expectation that things will improve over time and investors will collect dividends that soften negative price action along the way.
<b><u>Income</u></b>	
<b>Municipal Income</b>	Municipal Income is an ETF ladder strategy built with a diversified portfolio of state and local bonds. These ETFs provide regular interest payments and distribute a final payout at each ETF’s stated maturity date. At maturity, original principal and earned interest are reinvested into the next ladder segment.
<b>Treasury Income</b>	Treasury Income is an ETF ladder strategy built with a diversified portfolio of U.S. Treasury Bonds. These ETFs provide regular interest payments and distribute a final payout at each ETF’s stated maturity date. At maturity, original principal and earned interest are reinvested into the next ladder segment.
<b>Core Fixed Income</b>	Core Fixed Income is a long-term income generation strategy focused on capital preservation by managing principal risk. Core Fixed Income invests in a diversified basket of global ETFs across the income spectrum using U.S. bonds, global bonds, corporate bonds, mortgages, and other asset classes. The portfolio seeks to produce long-term returns above the bond aggregate market.
<b>Dynamic Income</b>	Dynamic Income is a fully tactical investment strategy designed to produce income while managing principal risk. The strategy invests in a diversified basket of global ETFs across the income spectrum using U.S. bonds, international bonds, corporate bonds, mortgages, and U.S. and international dividend equities. The strategy seeks a target yield of inflation +2-3%, protection against rising interest rates & inflation with real assets, potential for appreciation through growth assets, and downside protection through a tactical allocation to yield sources with diversification benefits.

## Dynamic Asset Allocation

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### **Dynamic Hedged Equity, a CAN SLIM® Strategy**

Dynamic Hedged Equity, a CAN SLIM® Strategy, is a tactical, long-term growth strategy focused on capital appreciation with a secondary objective of downside protection. The strategy invests in leading growth stocks during favorable equity environments and scales to cash to preserve gains when bear market risk is high. The strategy adheres to a flexible investment mandate that allows for allocation shifts that range between 0%-100% exposure to equities. Positions are managed (purchased and liquidated) through a combination of CAN SLIM® guidelines and a proprietary stock scoring system designed to build a comprehensive growth portfolio.

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### **Dynamic Hedged International Equity, a CAN SLIM® Strategy**

Dynamic Hedged International Equity, a CAN SLIM® Strategy, is a tactical, long-term growth strategy focused on capital appreciation with a secondary objective of downside protection. The strategy invests in leading international growth equities in the form of American Depository Receipts (ADRs) and Exchange-Traded Funds (ETFs) during favorable equity environments and scales to cash to preserve gains when bear market risk is high. Positions are managed (purchased and liquidated) through a combination of CAN SLIM® guidelines and a proprietary security scoring system designed to build a comprehensive growth portfolio.

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### **Dynamic Hedged Equity: SRI**

Dynamic Hedged Equity: SRI is a socially responsible long-term tactical growth strategy focused on capital appreciation. Socially responsible investing (SRI) avoids industries with generally negative impacts on society and seeks out companies that are pioneers in environmental, social and corporate governance (ESG) operations. The strategy incorporates restrictions on these industries and ESG analysis from a third party with proprietary market outlook and stock scoring models. It invests in leading growth stocks during favorable equity environments and scales to cash to preserve gains when bear market risk is high. Adhering to a flexible investment mandate allows for allocation shifts that range between 0%-100% exposure to equities.

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### **NorthCoast Growth**

NorthCoast Growth is a tactical, long-term growth strategy focused on capital appreciation with a secondary objective of downside protection. The strategy invests in leading growth stocks during favorable equity environments and scales to cash to preserve gains when bear market risk is high. The strategy adheres to a flexible investment mandate that allows for allocation shifts that range between 0%-100% exposure to equities. Positions are managed (purchased and liquidated) through a proprietary stock scoring system designed to build a comprehensive growth portfolio.

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**Dynamic Hedged Equity: Tax-Managed**

Dynamic Hedged Equity: Tax-Managed is a long-term tactical growth strategy focused on capital appreciation with a mandate to reduce the impact of tax consequences. The strategy invests in leading growth stocks during favorable equity environments and scales to cash to preserve gains when bear market risk is high. The strategy adheres to a flexible investment mandate that allows for allocation shifts that range between 0%-100% exposure to equities. Positions are managed (purchased and liquidated) through a proprietary stock scoring system with tax considerations designed to build a comprehensive growth portfolio.

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**Dynamic Hedged Equity: Shariah Values**

Dynamic Hedged Equity: Shariah Values is a long-term tactical growth strategy focused on capital appreciation with a mandate to restrict specific holdings based on the religious considerations of Shariah law. The strategy invests in leading growth stocks during favorable equity environments and scales to cash to preserve gains when bear market risk is high. The strategy adheres to a flexible investment mandate that allows for allocation shifts that range between 0%-100% exposure to equities. Positions are managed (purchased and liquidated) through a proprietary stock scoring system with faith-based considerations designed to build a comprehensive growth portfolio.

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**Dynamic Hedged Equity: Christian Values**

Dynamic Hedged Equity: Christian Values is a long-term tactical growth strategy focused on capital appreciation with a mandate to restrict specific holdings based on the religious considerations of Christian values and beliefs. The strategy invests in leading growth stocks during favorable equity environments and scales to cash to preserve gains when bear market risk is high. The strategy adheres to a flexible investment mandate that allows for allocation shifts that range between 0% - 100% exposure to equities. Positions are managed (purchased and liquidated) through a proprietary stock scoring system with faith-based considerations designed to build a comprehensive growth portfolio.

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**Dynamic Aggressive Equity**

Dynamic Aggressive Equity is a hedged equity strategy focused on capital appreciation. Invests in leading ETFs in favorable market environments. Aggressively scales to cash to preserve gains when unfavorable market risk moves higher. Positions are managed through a proprietary scoring system designed to build a comprehensive portfolio.

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**Dynamic Asset Allocation**

Dynamic Asset Allocation is a fully tactical investment strategy designed to generate long-term growth. The strategy invests in a diversified basket of global ETFs across the asset class spectrum using global equities, global bonds, real estate, alternative investments, and cash equivalents. The primary objective is long-term capital appreciation with a secondary objective of capital preservation.

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<b>SectorSelect Hedged</b>	Sector Select Hedged is a fully tactical investment strategy designed to generate long-term growth with downside risk protection. The strategy utilizes a proprietary scoring and selection process to actively allocate across U.S. sector ETFs. The strategy invests in sectors with higher risk-adjusted return potential and reduces or eliminates exposure to sectors with lower risk-adjusted return potential while applying defensive cash scaling risk controls designed to reduce volatility and mitigate significant loss.
<b>Sierpinski Tactical Growth (Sub-advised)</b>	Sierpinski Tactical Growth is a core portfolio diversifier based on Hedgeye Research that seeks to grow capital while providing downside risk protection. The portfolio management approach combines fundamental security selection with quantamental data analysis and a quad risk management overlay in order to maximize performance while providing hedged risk protection.

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### Options Strategies

#### *Defined Outcome Strategies*

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<b>Buffer 10</b>	Designed to track the return of the S&P 500 Price Index (up to a predetermined cap) while buffering Clients against a decline of approximately 10% of losses over the Outcome Period, from -5% to -15%, before fees and expenses. Client is exposed to loss approximately between 0% and -5%, and -15% and beyond.
<b>Buffer 20</b>	Designed to track the return of the S&P 500 Price Index (up to a predetermined cap) while buffering Clients against a decline of approximately 20% of losses over the Outcome Period, from -5% to -25%, before fees and expenses. Client is exposed to loss approximately between 0% and -5%, and -25% and beyond.
<b>Growth</b>	If the S&P 500 Price Index return is negative for the outcome period, the strategy is designed to track the S&P 500 Price Index before fees and expenses. If the S&P 500 Price Index return is positive for the outcome period, the strategy is designed to return a multiple of the return of S&P 500 Price Index before fees and expenses. Usually at 1.5 times. Outcome Period is approximately 2+ years.
<b>Balanced</b>	If the S&P 500 Price Index return is positive for the outcome period, the strategy is designed to track the S&P 500 Price Index before fees and expenses. If the S&P 500 Price Index return is negative for the outcome period, the strategy is designed to return a multiple of the return of S&P 500 Price Index before fees and expenses. Usually at 0.7 times. Outcome Period is approximately 2+ years.

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<b>Capital Preservation and Upside</b>	Capital Preservation and Upside is an S&P 500 participation strategy combined with an option overlay with the goal to protect downside loss and participate in market upside.
<b>Protection 10</b>	Designed to track the return of the S&P 500 Price Index (up to a predetermined cap) while protecting against any decline greater than 10% of S&P 500 price index at the end of the Outcome Period, before fees and expenses. Outcome Period is approximately 2+ years.
<b>Protection High Yield</b>	Designed to generate High Yield Income while protecting against any decline greater than 10% of the High Yield index at the end of the Outcome Period, before fees and expenses. Outcome Period is approximately 1+ years.
<b>Income &amp; Buy the Dip 10%</b>	Designed to generate income and track the return of the S&P 500 Price Index below a predetermined amount. Client is exposed to loss beyond the predetermined amount. Predetermined amount is typically -10% and Outcome Period is approximately 1+ quarter.
<b>Income &amp; Buy the Dip 20%</b>	Designed to generate income and track the return of the S&P 500 Price Index below a predetermined amount. Client is exposed to loss beyond the predetermined amount. Predetermined amount is typically -20% and Outcome Period is approximately 1+ quarter.
<b>Premium Income</b>	Premium Income is a defined outcome options strategy designed to generate income through dividends and option premiums on the S&P 500 to a cap of 10% over 1 year.

*Option Overlays – Concentrated Stock and Portfolio Solutions*

<b>Basis Hedge Covered Call</b>	Goal is to generate income (and maintain partial upside appreciation potential of position) while reducing volatility exposure of an illiquid or otherwise difficult-to-trade concentrated position by generating an independent investment return stream through the systematic sale of call options against a substitute security or an index.
<b>Basis Hedge Collar</b>	Goal is to lower the ongoing volatility exposure of an illiquid or otherwise difficult-to-trade concentrated position. This strategy will attempt to apply the income generated through the sale of call options on a substitute security or index towards the purchase of put options on the same substitute security or index on an ongoing basis to provide partial protection against large declines in the value of the concentrated position.

<b>Basis Hedge Put</b>	Designed to lower the ongoing volatility of an index-tracking basket of stocks and provide partial protection against large declines in that index. A put on the index is purchased against future dividends of stocks in the basket, flooring client's losses at approximately -30% in the end of the Outcome Period. Client is exposed to loss approximated between 0% and -30%.
<b>Covered Call Upside</b>	Goal is to generate some income (and maintain significant upside appreciation potential of the position) while lowering overall volatility exposure of the concentrated position by generating an independent investment return stream through the systematic sale of call options against the underlying stock position.
<b>Covered Call Liquidation</b>	Goal is to generate income (and maintain partial upside appreciation potential of position) while lowering overall volatility exposure of the concentrated position by generating an independent investment return stream through the systematic sale of call options against the underlying stock position and / or substitute securities or indices.
<b>Collar</b>	Goal is to lower the ongoing volatility exposure of the concentrated stock position. This strategy will attempt to apply the income generated through the sale of call options on the concentrated equity position or the substitute securities or indices toward the purchase of put options on the concentrated equity position or the substitute securities or indices on an ongoing basis in an attempt to provide partial protection against large declines in the value of the concentrated stock position.
<b>Protective Put</b>	Protective Put is used to help protect against potential losses in a concentrated stock position. The approach involves buying a put option while simultaneously holding the concentrated stock position. By purchasing a put option, the client gains the ability to sell the stock at the strike price, regardless of how much the stock's price may decline in the future.
<b>Exchange Fund Replication</b>	Exchange Fund Replication is an options overlay strategy that helps a client exchange single concentrated stock risk for market risk. This strategy helps protect the existing concentrated position by purchasing put options and financing downside protection by selling call options. The strategy also involves buying call options on a market index to attempt to gain upside exposure and selling put options on that index to help finance that upside exposure.

### Alternatives

<b>Premium Equity Income</b>	Premium Equity Income is a strategy designed to generate income through dividends and option premiums by investing in U.S. large-cap stocks complemented with covered call liquidation options.
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**Private  
Investments**

Private Investments is a long-term separate account strategy focused on capital appreciation. The strategy invests in alternative mutual funds and ETFs with low correlation to major market indices. All positions within this strategy can be expected to have liquidity restrictions making them generally available only once per quarter. Due to share repurchase caps and the potential for repurchase suspensions, access to assets may be limited.

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**Option Strategies Risk Factors:**

The Strategy may be based upon proprietary option overlay evaluation, trading and execution techniques developed or licensed by NorthCoast and identified and monitored by NorthCoast. NorthCoast will evaluate the liquidity of the option market for the underlying concentrated stock position in consultation with client.

Advisor or Subadvisor will continually monitor all option positions and will look to manage the continued rolling forward of positions at maturity or by sale and repurchase of new positions prior to option maturities, and may rely on its proprietary system. Advisor or Subadvisor may use proprietary rules and quantitative analysis to determine when to sell calls and / or purchase puts. In an attempt to manage the risk of options trades, Subadvisor may employ quantitative probability analysis based upon market volatility information or other options investment techniques.

Normally, call options sold will be at various "out of the money" (above current price of security) execution or strike prices and different maturities ranging from three to six to nine months. The sale of call options against the underlying stock position generates premium income. This strategy, however, may effectively cap the upside market appreciation of the stock position if its price rises above the option strike price before option maturity. Client understands and acknowledges that this strategy may result in reduced or limited participation in future appreciation of the concentrated stock position. Client also acknowledges and understands that call options can be assigned, meaning part or all of their underlying stock positions could be sold to generate cash to settle options at maturity resulting in the realization of taxable gains. Client also understands that American-style options can be exercised early, requiring the client to sell the specified number of shares of the underlying stock to the buyer of the call option at the time of the exercise.

While Advisor or Subadvisor will attempt to manage all options positions to enhance portfolio returns and protect against assignment and the realization of taxable gains and will also attempt to purchase shares for short settlement as described above in the event of assignment, Client acknowledges their understanding that no assurances can be made that such taxable gains will not occur.

With respect to certain Client accounts, it may be necessary to sell a portion of the underlying stock positions to satisfy expected tax liability, post margin or purchase additional options.

The Collar approach will purchase put options on an ongoing basis with the goal of providing partial protection based upon the risk, cost and duration criteria to be determined upon the implementation of the strategy by the Client and as such may be adjusted going forward. The Collar will attempt to balance the call option premium over time versus put option expense. Client understands and

acknowledges that the relationship between price movements of securities and various put and call options on the same security may vary greatly and that no assurances can be made that the perceived protection to be provided when a put option is purchased will actually result. In addition, declines in portfolio values may result even when the stock price is stable or rising due to the decline of option values as they decay in value as they approach maturity. Maintaining the desired level of protection through time will require an occasional rebalancing of the option positions. Depending on client's access to margin account, option trading level permissions and extreme market conditions, rebalancing transactions may cause the client to temporarily deviate from the target level of protection. The decision to purchase Put options will be solely at the direction of the Client, in consultation with Advisor and Subadvisor, when choosing the Collar strategy. The Collar approach will not necessarily purchase put options on an ongoing basis but selectively with the goal of providing partial protection based upon the risk, cost and duration criteria to be determined upon the implementation of the strategy by the Client and as such may be adjusted going forward. The goal of the Collar is to provide selective, partial protection against large declines in value of the underlying security while attempting to provide a positive net income of call option premium overtime versus put option expense. A Collar strategy involves applying the income generated through the sale of call options to pay for the desired level of put protection. Client understands and acknowledges that the relationship between price movements of securities and various put and call options on the same security may vary greatly and that no assurances can be made that the perceived protection to be provided when a put option is purchased will actually result. Put options are often more expensive than comparable call options. As a result, the sale of call options (risking the loss of part of or all of potential price appreciation of the security) to generate premium income often does not result in enough income to pay for the put protection on the entire stock position. In addition, declines in portfolio values may result even when the stock price is stable or rising due to the decline of option values as they decay in value as they approach maturity.

Client accounts will typically include:

- Holding concentrated stock position
- Sale of Call Options (attempt to generate short term capital gains) against concentrated equity position or substitute security or index. Calls may be repurchased prior to maturity or be allowed to expire at maturity.
- Purchase of Protective Put Options – usually laddered over several expiration dates (attempt to create the limited downside protection) against concentrated equity positions or substitute security or index. Puts may be repurchased prior to maturity or be allowed to expire at maturity.
- Strategic selling of client concentrated stock position (if elected)

Options change the risk profile of the portfolio. The sale of Call options may effectively cap the total upside of the Stock position, entail possible loss of principal in a rising market and can offset gains in the long Stock position. The purchase of Puts entails an expense and can be a drag on portfolio returns.

### **Account Considerations**

The Strategy may not be able to be deployed in the same manner in either an IRA or a non-IRA account. The Strategy does not use margin to borrow or create any actual portfolio leverage. However, the Strategy does use options and options can be used to create 'implied leverage'. Implied leverage is when you use an option to control more shares than you could control just buying the underlying security. The collar does not use options to create implied leverage. Generally, a margin account is required to trade options. Subadvisor is responsible for the placing of all purchase and sale orders in the Client's segregated account and providing instructions concerning the delivery of cash or securities for the settlement of option trades.

Client should consult with their tax advisor to address the income tax consequences of options trading strategies. Client also acknowledges their responsibility to notify Subadvisor and Advisor in writing of any restrictions or prohibited transactions related to the concentrated securities in their account.

### **Defined Outcome Strategies Risk Factors Outcome Period**

The Initial Outcome Period is approximately 1-year long for the buffered strategies and Preservation High Yield strategy, 1-quarter long for the Income & Buy the Dip strategy, and greater than 2 years otherwise, from the Client's onboarding until the date at which the next Outcome Period begins. Following the Initial Outcome Period, each subsequent Outcome Period will begin on the day new options positions are implemented in the account.

The Strategy will not automatically terminate after the conclusion of the Outcome Period. After the conclusion of an Outcome Period, another Outcome Period will begin.

### **Strategy Parameters**

Upside participation, downside participation/protection, and buffer levels are fixed for the Outcome Period and should be considered before investing in the Strategy.

The Cap and downside participation/protection will change based upon prevailing market conditions at the beginning of each Outcome Period. The Buffer reference points may rise or fall from one Outcome Period to the next. The Strategy cap represents the maximum return available, before fees and expenses, if held to the end of the current Outcome Period. This means that if the S&P 500 Price Index experiences gains for the Outcome Period beyond the Cap, a Client will not realize those excess gains. The cap does not imply the Strategy will achieve its maximum potential return. The benchmark index may need to rise higher or lower than the stated cap.

The S&P 500 Price Index does not provide for dividends, as such the Options on the Index do not provide for upside exposure to dividends.

Similarly, the buffer that the Strategy seeks to provide is only operative against the percentage (i.e., 10%, 20% after the initial 5%) of S&P 500 Price Index losses for the applicable Strategy's Outcome Period. Once the buffer has been breached, the Strategy can lose value significantly. The buffer may not be realized on a 1:1 basis compared to the benchmark index.

The preservation strategies are designed to offer protection, before fees and expenses, against losses in excess of a predetermined percentage of the S&P 500 Price Index or High Yield Index losses for the applicable Strategy's Outcome Period. This predetermined percentage of the S&P 500 Price Index or High Yield Index losses changes based upon prevailing market conditions at the beginning of each Outcome Period. Similarly, for the growth and balanced strategy the parameters change based upon prevailing market conditions at the beginning of each Outcome period.

### **Intra-Period and Correlation Risks**

It is important to note that Clients allocated to the Strategy for less than the entire Outcome period will experience different results that deviate from the projected outcome.

The strategy seeks to meet the objectives for an entire Outcome Period and the objectives are likely to be met only at the end of the Outcome Period. The value of the Strategy account might fluctuate intra-

Period and may not be identical to the End-of-Period pattern, but moves toward it as the Period progresses. Intra-period, the options value is based on a daily mark to market, which may result in an intra-Period value deviating from the End-of-Period value.

Depending upon market conditions at the time of purchase, a Client who adds or withdraws from the account after the Outcome Period has begun may also lose their entire investment. For instance, if the Outcome Period has begun and the Strategy has decreased in value beyond the pre-determined percentage buffer, a Client may not benefit from the buffer. Similarly, if the Outcome Period has begun and the Strategy has increased in value, a Client adding to the strategy may not benefit from the buffer until the Index value has decreased to its value at the commencement of the Outcome Period.

### **Minimum Account Size, Increments and Rounding Risk**

Option contracts typically give exposure to a certain quantity of underlying. In the case of S&P 500 Price Index options, one contract gives notional exposure to 100 times the Index; it has a contract multiplier of \$100.

At the end of an Outcome Period, ETF/Mutual Fund holdings might need to be liquidated to offset any remaining option positions. The ending value of the account might not coincide with the minimum account size or increments as it might have at the beginning of the Outcome Period. Rounding can thus occur for the next Outcome Period while it was not in effect for the previous Outcome Period.

In the case of SPY ETF Options, the minimums are lower than SPX index options by approximately a factor of 10. This is because the price of SPX is approximately 10 times that of SPY. The information provided here is for illustration purposes only and with the market conditions and time the min values shall change. In addition to the minimums mentioned above, NorthCoast could employ a minimum account value requirement, which is independent of the market conditions and type of options employed.

### **Option Contract Availability, Liquidity and Settlement**

At the beginning of a new Outcome Period, Option contract availability can limit optimal implementation of the Strategy. Advisor will determine alternative choices and may adjust some parameters of the strategy including but not limiting to: length of Outcome Period, Buffer Amount, Start of Buffer, Cap Amount, type of options, choice of underlying.

In the event that trading in the underlying Options is limited or absent, the value of the Options may decrease. There is no guarantee that a liquid secondary trading market will exist for the Options. The trading in Options may be less deep and liquid than the market for certain other securities. A less liquid trading market may adversely affect the value of the Options.

At the end of an Outcome Period, lack of liquidity can negatively affect the Strategy during its normal course of trading. Such issues can trigger delays in the start of the new Outcome Period, options might be required to be settled at maturity, requiring unexpected liquidation of other holdings in the account.

### **ETF Risks**

The Strategy may rely on ETFs. ETFs face numerous market trading risks, including the potential lack of an active market for Strategy, losses from trading in secondary markets, periods of high volatility and disruption in the creation/redemption process. ETFs may trade at a premium or discount to their

net asset value. ETFs are bought and sold at market price and not individually redeemed from the Strategy.

### **Mutual Fund Risks**

The strategy may rely on Passive Mutual funds. Passive Mutual funds face numerous risks such as, but not limited to, market trading risks, market volatility, Issuer-specific changes, correlation to Index, passive management risk and securities lending risk. An investment in the fund is not a deposit of a bank and is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. You could lose money by investing in the fund. Mutual funds are traded end of day vs intraday trading for options. This can create a mismatch and can create additional losses. Any difference between the dividends received from the mutual fund and the underlying index can negatively influence the outcome of the strategy.

### **Dividend Risk**

Dividend payments may fluctuate as market conditions change. The strategy relies on future dividend payments to determine an upside cap. Any difference between expected dividends and dividends received can negatively impact the outcome of the strategy. Also, any difference between the dividends received from the mutual fund and the underlying index can negatively influence the outcome of the strategy.

### **Account Considerations, Borrowing and Leverage**

The Strategy may not be able to be deployed in the same manner in accounts with restrictions (IRA accounts).

The Strategy does use options and options can be used to create 'implied leverage'. Implied leverage is when you use an option to control more shares than you could control just buying the underlying security. Generally, a margin account is required to trade options.

The Strategy may borrow money, use margin or leverage. Any such measures are intended to be temporary. However, under certain market conditions, including periods of customer cash withdrawal, low demand or decreased liquidity, such measures might be outstanding for longer periods of time. The strategy can face margin calls or other arbitrary risk limits from the custodian, forcing the Strategy to be partially or fully liquidated before the end of the period. Such disposal of assets can occur on unfavorable terms.

The Buffer strategy and Preservation Max 10 cannot be implemented in an IRA. Other strategies such as Growth, Balanced and Preservation no cap, Preservation High Yield, Income & Buy the Dip could be implemented in an IRA with several limitations. These strategies rely on future expected dividends to finance the purchase of options. Typically, the financing happens through margin and later is paid back through dividends received. Please look at our Dividend risk section of this document for more details on this. However, IRA accounts are not permitted to operate on margin. Due to this limitation, the account is required to hold the expected future dividends in cash to finance the options. Typically for a 2+ years outcome period, the estimated dividends can be more than 6% of the account value. In case the initial cash is not available the advisor might sell the S&P 500 equivalent ETF or mutual fund that is held in the account. Also, the client acknowledges not to sell any securities that are managed by the advisor and in an event the client sells any securities managed by the advisor, the client assumes full responsibility of any consequences.

### **Options on Indices and/or ETF's**

The Options in which the Strategy invests could be options on an index, the S&P 500 Price Return Index (the “S&P 500 Price Index”), or options on an ETF, SPY (S&P 500 ETF) HYG (iBoxx High Yield Corporate Bond ETF). An index or an ETF fluctuates with changes in the market values of the securities included in the index or ETF. Options on indices give the holder the right to receive an amount of cash upon exercise of the option. Receipt of this cash amount will depend upon the closing level of the index upon which the option is based being greater than (in the case of a call) or less than (in the case of put) the exercise price of the option.

Options on ETF’s give the holder the right to receive an amount of shares of the ETF upon exercise of the option. Options on ETF’s can be exercised by the holder at any time before the expiration. Client also acknowledges and understands this assignment might terminate earlier the Outcome Period and might influence the nature of the Outcome, along with a potential realization of taxable gains.

Each of the options exchanges has established limitations governing the maximum number of call or put options on the same index or the same ETF that may be bought or written by a single Client, whether acting alone or in concert with others (regardless of whether such options are written on the same or different exchanges or are held or written on one or more accounts or through one or more brokers). Under these limitations, option positions of all customers advised by Advisor are combined for purposes of these limits. Pursuant to these limitations, an exchange may order the liquidation of positions and may impose other sanctions or restrictions. These positions limits may restrict the number of listed options that Advisor may buy or sell.

Puts and calls on indices are similar to puts and calls on securities except that all settlements are in cash and gain or loss depends on changes in the index in question rather than on price movements in individual securities.

Puts and calls on ETFs are similar to puts and calls on securities except that gain or loss depends on changes in the ETF price in question rather than on price movements in individual securities.

### **Risks of Options on Indices and/or ETF’s**

Positions in equity options can reduce equity market risk, but can limit the opportunity to profit from an increase in the market value of stocks in exchange for upfront cash at the time of selling the call option. Unusual market conditions or the lack of a ready market for any particular option at a specific time may reduce the effectiveness of option strategies and could result in losses.

Utilizing a strategy with a diversified equity portfolio and derivatives, with a Put/Spread Collar options overlay, may not provide greater market protection than other equity investments nor reduce volatility to the desired extent, as unusual market conditions or the lack of a ready option market could result in losses. Derivatives expose the Strategy to risks of mispricing or improper valuation and the Strategy may not realize intended benefits due to underperformance. When used for hedging, the change in value of a derivative may not correlate as expected with the risk being hedged.

Short-Term Instruments and Temporary Investments (non-principal investment).

The Strategy may invest in short-term instruments, including money market instruments, on an ongoing basis to provide liquidity or for other reasons.

### **Alternative Investments**

Alternative investments are appropriate only for clients who are prepared to invest funds for which they will have no near-term liquidity need. While certain alternative investments offer quarterly

liquidity, the ability to redeem the investment is not guaranteed. Alternative investments are considered illiquid and investors should not expect to be able to sell their shares. In addition, investors who are able to sell their shares may receive a redemption price that is materially lower than the net asset value previously provided in statements from the investment manager. With any alternative investment, clients should only invest an amount they are prepared to lose. There is the possibility that the investment will produce no return at all or a loss of all or a portion of the client's investment. Alternative investments are speculative and often use leverage, which will magnify any losses. Each alternative investment has an offering document containing a detailed written description of the risks and fees and expenses associated with the investment. Clients are encouraged to review these documents carefully.

### **General Risk Factors**

NorthCoast has developed and implemented trading programs which were built using the combined experience and training of its employees. No single employee has the sole responsibility for determining securities investment advice.

NorthCoast requires that those employees involved in determining or giving investment advice to clients are knowledgeable and experienced in the use of these systems.

While research is thorough, clients must be prepared for the risk of loss. All investments in securities risk the loss of capital. In addition, we identify four principal types of risk:

- 1) Risk that the stock market declines or the price of individual securities decline while the true long-term value of the company may be unchanged or possibly even higher;
- 2) Faulty analysis;
- 3) External events negatively affecting the value of a specific company; and
- 4) Fraud, in which case no amount of analysis could have been sufficient.

### **Cybersecurity**

The computer systems, networks and devices used by NorthCoast and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach.

Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information. Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers, and other financial institutions; and other parties. In addition, substantial costs may be incurred by

these entities in order to prevent any cybersecurity breaches in the future.

### **Item 9 – Disciplinary Information**

There have been no disciplinary actions or events regarding NorthCoast or any of its employees.

### **Item 10 – Other Financial Industry Activities and Affiliations**

#### **Focus Financial Partners**

As noted above in response to Item 4, certain investment vehicles affiliated with CD&R collectively are indirect majority owners of Focus LLC, and certain investment vehicles affiliated with Stone Point are indirect owners of Focus LLC. Because Connecticut is an indirect, wholly-owned subsidiary of Focus LLC, CD&R and Stone Point investment vehicles are indirect owners of Connecticut.

#### **Credit and Cash Management Solutions**

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions through UPTIQ Treasury & Credit Solutions, LLC (together with UPTIQ, Inc. and its affiliates, “UPTIQ”) and Flourish Financial LLC (“Flourish”). These third-party financial institutions are banks and non-banks that offer credit and cash management solutions to our clients, as well as certain other unaffiliated third parties that provide administrative and settlement services to facilitate UPTIQ’s cash management solutions. UPTIQ acts as an intermediary to facilitate our clients’ access to these credit and cash management solutions. Flourish acts as an intermediary to facilitate our clients’ access to cash management solutions.

We are a wholly owned subsidiary of Focus Financial Partners, LLC (“Focus”). Focus is a minority investor in UPTIQ, Inc. UPTIQ is compensated by sharing in the revenue earned by such third-party financial institutions for serving our clients. The revenue paid to UPTIQ also benefits UPTIQ Inc.’s investors, including Focus. When legally permissible, UPTIQ also shares a portion of this earned revenue with our affiliate, Focus Solutions Holdings, LLC (“FSH”). For non-residential mortgage loans made to our clients, UPTIQ will share with FSH up to 25% of all revenue it receives from the third-party financial institutions. For securities-backed lines of credit (“SBLOCs”) made to our clients, UPTIQ will share with FSH up to 75% of all revenue it receives from such third-party financial institutions. For cash management products and services provided to our clients, UPTIQ will share with FSH up to 33% of all revenue it receives from the third-party financial institutions and other intermediaries that provide administrative and settlement services in connection with this program. As noted above, Flourish facilitates cash management solutions for our clients. When legally permissible, Flourish pays FSH a revenue share of up to 0.10% of the total amount of cash held in Flourish cash accounts by our clients. This earned revenue is indirectly paid by our clients through an increased interest rate charged by the third-party financial institutions for credit solutions or reduced yield paid by the providers of cash management solutions. FSH distributes this revenue to us when we are licensed to receive such revenue (or when no such license is required) and the distribution is not otherwise legally prohibited. This revenue is also revenue for FSH’s and our common parent company, Focus. Additionally, the volume generated by our clients’ transactions allows Focus to negotiate better terms with UPTIQ and Flourish, which benefits Focus and us. Accordingly, we have a conflict of interest when recommending UPTIQ’s and Flourish’s services to clients because of the compensation to us and to our affiliates, FSH and Focus, and the transaction



volume to UPTIQ and Flourish. We mitigate this conflict by: (1) fully and fairly disclosing the material facts concerning the above arrangements to our clients, including in this Brochure; and (2) offering UPTIQ's and Flourish's solutions to clients on a strictly nondiscretionary and fully disclosed basis, and not as part of any discretionary investment services. Additionally, we note that clients who use UPTIQ's and Flourish's services will receive product-specific disclosure from the third-party financial institutions and other unaffiliated third-party intermediaries that provide services to our clients.

We have an additional conflict of interest when we recommend credit solutions to our clients because our interest in continuing to receive investment advisory fees from client accounts gives us a financial incentive to recommend that clients borrow money rather than liquidate some or all of the assets we manage.

### Credit Solutions

Clients retain the right to pledge assets in accounts generally, subject to any restrictions imposed by clients' custodians. While credit solution programs that we offer facilitate secured loans through third-party financial institutions, clients are free instead to work directly with institutions outside such programs. Because of the limited number of participating third-party financial institutions, clients may be limited in their ability to obtain as favorable loan terms as if the client were to work directly with other banks to negotiate loan terms or obtain other financial arrangements.

Clients should also understand that pledging assets in an account to secure a loan involves additional risk and restrictions. A third-party financial institution has the authority to liquidate all or part of the pledged securities at any time, without prior notice to clients and without their consent, to maintain required collateral levels. The third-party financial institution also has the right to call client loans and require repayment within a short period of time; if the client cannot repay the loan within the specified time period, the third-party financial institution will have the right to force the sale of pledged assets to repay those loans. Selling assets to maintain collateral levels or calling loans may result in asset sales and realized losses in a declining market, leading to the permanent loss of capital. These sales also may have adverse tax consequences. Interest payments and any other loan-related fees are borne by clients and are in addition to the advisory fees that clients pay us for managing assets, including assets that are pledged as collateral. The returns on pledged assets may be less than the account fees and interest paid by the account. Clients should consider carefully and skeptically any recommendation to pursue a more aggressive investment strategy in order to support the cost of borrowing, particularly the risks and costs of any such strategy. More generally, before borrowing funds, a client should carefully review the loan agreement, loan application, and other forms and determine that the loan is consistent with the client's long-term financial goals and presents risks consistent with the client's financial circumstances and risk tolerance.

We use UPTIQ to facilitate credit solutions for our clients.

### Cash Management Solutions

For cash management programs, certain third-party intermediaries provide administrative and settlement services to our clients. Engaging the third-party financial institutions and other intermediaries to provide cash management solutions does not alter the manner in which we treat cash for billing purposes. Clients should understand that in rare circumstances, depending on interest rates and other economic and market factors, the yields on cash management solutions could be lower than the aggregate fees and expenses charged by the third-party financial institutions, the intermediaries referenced above, and us. Consequently, in these rare circumstances, a client could

experience a negative overall investment return with respect to those cash investments. Nonetheless, it might still be reasonable for a client to participate in a cash management program if the client prefers to hold cash at the third-party financial institutions rather than at other financial institutions (e.g., to take advantage of FDIC insurance).

We use UPTIQ and Flourish to facilitate cash management solutions for our clients.

### **Focus Risk Solutions**

We help clients obtain certain insurance products from unaffiliated insurance companies by introducing clients to our affiliate, Focus Risk Solutions, LLC (“FRS”), a wholly owned subsidiary of our parent company, Focus Financial Partners, LLC (“Focus”). FRS acts as an intermediary to facilitate our clients’ access to insurance products. FRS has agreements with certain third-party insurance brokers (the “Brokers”) under which the Brokers assist our clients with regulated insurance sales activity.

If FRS refers one of our clients to a Broker and there is a subsequent purchase of insurance through the Broker, FRS will receive a portion of the upfront and/or ongoing commissions paid to the Broker by the insurance carrier with which the policy was placed. The amount of revenue earned by FRS for the sale of these insurance products will vary over time in response to market conditions. The amount of insurance commission revenue earned by FRS is considered for purposes of determining the amount of additional compensation that certain of our financial professionals are entitled to receive. The amount of revenue earned by FRS for a particular insurance product will also differ from the amount of revenue earned by FRS for other types of insurance products. This revenue is also revenue for our and FRS’s common parent company, Focus. Accordingly, we have a conflict of interest when recommending FRS’s services to clients because of the compensation to certain of our financial professionals and to our affiliates, FRS and Focus. We address this conflict by: (1) fully and fairly disclosing the material facts concerning the above arrangements to our clients, including in this Brochure; and (2) offering FRS solutions to clients on a strictly nondiscretionary and fully disclosed basis, and not as part of any discretionary investment services. Additionally, we note that clients who use FRS’s services will receive product-specific disclosure from the Brokers and insurance carriers and other unaffiliated third-party intermediaries that provide services to our clients.

The insurance premium is ultimately dictated by the insurance carrier, although in some circumstances the Brokers or FRS may have the ability to influence an insurance carrier to lower the premium of the policy. The final rate may be higher or lower than the prevailing market rate, and may be higher than if the policy was purchased directly through the Broker without the assistance of FRS. We can offer no assurances that the rates offered to you by the insurance carrier are the lowest possible rates available in the marketplace.

As stated earlier in this brochure, we offer tax preparation services under the trade name Connecticut Accountants. Focus LLC has a financial incentive to encourage us to recommend that our clients engage Connecticut Accountants, for tax preparation services. We have fully and fairly disclosed the material facts regarding this relationship in this brochure, and clients are free to accept or disregard the recommendation, as they wish.

We have been retained by other Focus partner firms through a subadvisory agreement in order to provide investment subadvisory services to certain clients of these Focus partner firms. We provide these services to such clients pursuant to a subadvisory agreement and in exchange for a fee paid by Focus partner firms’s clients. Focus partner firms, like us, is an indirect wholly owned subsidiary of Focus LLC and is therefore under common control with us. The allocation of Focus partner

firms' clients' assets to us pursuant to a subadvisory arrangement, rather than to an unaffiliated investment manager, increases our compensation and the revenue to Focus LLC, relative to a situation in which Focus partner firms' clients' assets are managed by an unaffiliated manager. As a consequence, Focus LLC has a financial incentive to encourage Focus partner firms to recommend that a portion of their clients' assets be subadvised by us, which creates a conflict of interest with those Focus partner firm clients who are subadvised by us.

More information about Focus LLC can be found at [www.focusfinancialpartners.com](http://www.focusfinancialpartners.com). We believe this conflict is mitigated because of the following factors: (1) our retention as a subadviser is based on Focus partner firms' judgment that such retention is in the best interest of its affected clients; (2) we have met the due diligence standards that these Focus partner firms apply to outside investment managers; (3) these Focus partner firms are willing and able to terminate our services, in part or in whole, if our services become unsatisfactory in the judgment of, and at the sole discretion of, each of the Focus partner firms; and (4) we have fully and fairly disclosed the material facts regarding this relationship, including in this Brochure, to the Focus partner firm clients for whom we act as subadviser, and such clients have therefore given their informed consent to this conflict.

### **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

Connectus has adopted a Code of Ethics (the "Code") pursuant to SEC Rule 204A-1, which requires each employee to comply with all applicable federal and state laws and regulations. The Code makes clear that business will be conducted consistent with the highest standards of commercial honor and just and equitable principles of trade. The trust of NorthCoast customers and the firm's reputation are of paramount importance. To that end, although employees are entitled to invest in the same securities that clients may hold, the Code requires each employee to avoid any action that results in a conflict of interest with the firm and its clients, prohibits outside business activities without the consent of the Chief Compliance Officer, prohibits trading on the basis of material non-public information and prohibits accepting extravagant gifts or entertainment from the firm's business relationships. Employees are required to report all personal securities transactions to the firm, are not permitted to participate in initial public offerings, and must obtain the approval of the Chief Compliance Officer to participate in any private offering.

The Code must be read, acknowledged and agreed to annually by every employee. The objective of the Code is to subject all business dealings and securities transactions undertaken by personnel, whether for clients or for personal purposes, to the highest ethical standards. NorthCoast personnel are expected to use fundamental principles of openness, integrity, honesty and trust. The Code requires that personnel protect the confidentiality of the information about the firm and its clients, act appropriately as a fiduciary toward clients, avoid any illegal or unethical activities, avoid conflicts of interest and comply with the personal trading policy, which is part of the Code.

The firm provides its Code of Ethics to any client or prospective client upon request.

### **Item 12 – Brokerage Practices**

In most cases, NorthCoast does not select broker-dealers for client transactions in individually managed accounts. In the rare event that NorthCoast is asked to recommend broker-dealers, clients must approve the recommendation which is based upon the execution capabilities and performance and commission rates to be paid, which will vary from broker to broker.

With few exceptions, clients use the brokerage services of Fidelity Brokerage Services, Morgan

Stanley, Oppenheimer, Wells Fargo, Stifel- Nicolaus & Company, Inc, UBS, RBC Wealth Management, Raymond James, TD Ameritrade, BNY, Pershing, BTIG, Instinet, Barclays Capital, BTIG, JP Morgan, Macquarie, Charles Schwab and TD Ameritrade Institutional, a division of TD Ameritrade, Inc., each a member FINRA/SIPC. Per NorthCoast policy, no commissions are used to pay for research or any other services.

NorthCoast evaluates brokers by considering the ability of a broker to provide trading platforms relevant to accounts they will custody, the broker's client service ability, and the reasonableness of the fees it charges. Reasonableness of fees is determined by comparing fees charged by a broker to market providers for similar services.

NorthCoast does not publish research reports or sell newsletters nor does it charge for financial planning, however, it does work with clients' accountants and attorneys when appropriate to discuss estate planning, generation skipping and tax efficiency. NorthCoast does not engage in other business activities.

NorthCoast has no soft dollar or research arrangements. Our goal is to obtain best execution for each client transaction. While quality of execution at the best price is an important determinant, best execution does not necessarily mean lowest/highest price (whether buying/selling) and it is not the sole consideration. NorthCoast considers a number of factors and may opt to trade through broker/dealers that execute with mark-ups/mark-downs that are reflected in the buy/sell price within the client account.

### **Item 13 – Review of Accounts**

NorthCoast receives periodic reports and monthly summaries from the various custodians. Frank Ingarra, Chief Operating Officer, and Megan Hall, Senior Vice President, Operations, are responsible for review of client accounts. By use of internal exception reports, designated firm persons review all accounts at various intervals and more frequently if (1) new transactions have been entered into for the account, (2) any discrepancy appears in daily reconciliation of the account's activities, or (3) there is a client inquiry. Daily reconciliations are performed by the operations personnel and results are organized to isolate any individual account problems that may arise for review by Ms. Hall or Mr. Ingarra.

NorthCoast may provide a monthly or quarterly (depending on specific client agreement) report showing the percentage performance of the account. Also, a monthly or quarterly client report shows the net asset value at the end of the period and advisory fees charged for the period.

### **Item 14 – Client Referrals and Other Compensation**

NorthCoast has written agreements with certain registered broker-dealers, registered investment advisers and other persons to compensate them for soliciting clients. All such solicited clients acknowledge any fee-sharing arrangement as well as receipt of the NorthCoast ADV Part 2 when executing an Investment Advisory Agreement.

Connectus's parent company is Focus Financial Partners, LLC ("Focus"). From time to time, Focus holds partnership meetings and other industry and best-practices conferences, which typically include Connectus, other Focus firms and external attendees. These meetings are first and foremost intended to provide training or education to personnel of Focus firms, including NorthCoast. However, the meetings do provide sponsorship opportunities for asset managers, asset custodians, vendors and

other third-party service providers. Sponsorship fees allow these companies to advertise their products and services to Focus firms, including NorthCoast. Although the participation of Focus firm personnel in these meetings is not preconditioned on the achievement of a sales target for any conference sponsor, this practice could nonetheless be deemed a conflict as the marketing and education activities conducted, and the access granted, at such meetings and conferences could cause NorthCoast to focus on those conference sponsors in the course of its duties. Focus attempts to mitigate any such conflict by allocating the sponsorship fees only to defraying the cost of the meeting or future meetings and not as revenue for itself or any affiliate, including Connectus. Conference sponsorship fees are not dependent on assets placed with any specific provider or revenue generated by such asset placement.

The following entities have provided conference sponsorship to Focus from January 1, 2023 to March 1, 2024:

Orion Advisor Technology, LLC  
TriState Capital Bank  
StoneCastle Network, LLC  
Charles Schwab & Co., Inc.  
Fidelity Brokerage Services LLC  
Fidelity Institutional Asset Management LLC

You can access a more recently updated list of recent conference sponsors on Focus' website through the following link: <https://focusfinancialpartners.com/conference-sponsors/>

***Participation in Fidelity Wealth Advisor Solutions®.*** NorthCoast participates in the Fidelity Wealth Advisor Solutions® Program (the "WAS Program"), through which NorthCoast receives referrals from Fidelity Personal and Workplace Advisors LLC (FPWA), a registered investment adviser and Fidelity Investments company. NorthCoast is independent and not affiliated with FPWA or any Fidelity Investments company. FPWA does not supervise or control NorthCoast, and FPWA has no responsibility or oversight for NorthCoast's provision of investment management or other advisory services.

Under the WAS Program, FPWA acts as a solicitor for NorthCoast, and NorthCoast pays referral fees to FPWA for each referral received based on NorthCoast's assets under management attributable to each client referred by FPWA or members of each client's household. The WAS Program is designed to help investors find an independent investment adviser, and any referral from FPWA to NorthCoast does not constitute a recommendation or endorsement by FPWA of NorthCoast's particular investment management services or strategies. More specifically, NorthCoast pays the following amounts to FPWA for referrals: the sum of (i) an annual percentage of 0.10% of any and all assets in client accounts where such assets are identified as "fixed income" assets by FPWA and (ii) an annual percentage of 0.25% of all other assets held in client accounts. In addition, NorthCoast has agreed to pay FPWA a minimum annual fee amount in connection with its participation in the WAS Program. These referral fees are paid by NorthCoast, not by the client.

To receive referrals from the WAS Program, NorthCoast must meet certain minimum participation criteria, but NorthCoast may have been selected for participation in the WAS Program as a result of its other business relationships with FPWA and its affiliates, including Fidelity Brokerage Services, LLC ("FBS"). As a result of its participation in the WAS Program, NorthCoast may have a potential conflict of interest with respect to its decision to use certain affiliates of FPWA, including FBS, for

execution, custody and clearing for certain client accounts, and NorthCoast may have a potential incentive to suggest the use of FBS and its affiliates to its advisory clients, whether or not those clients were referred to NorthCoast as part of the WAS Program. Under an agreement with FPWA, NorthCoast has agreed that it will not charge clients more than the standard range of advisory fees disclosed in its Form ADV Part 2A Brochure to cover solicitation fees paid to FPWA as part of the WAS Program. Pursuant to these arrangements, NorthCoast has agreed not to solicit clients to transfer their brokerage accounts from affiliates of FPWA or establish brokerage accounts at other custodians for referred clients other than when NorthCoast's fiduciary duties would so require, and NorthCoast has agreed to pay FPWA a one-time fee equal to 0.75% of the assets in a client account that is transferred from FPWA's affiliates to another custodian; therefore, NorthCoast may have an incentive to suggest that referred clients and their household members maintain custody of their accounts with affiliates of FPWA. However, participation in the WAS Program does not limit NorthCoast's duty to select brokers on the basis of best execution.

NorthCoast also has agreements with other solicitors, who have our permission to present our programs to potential investors who might not otherwise know about our services, in return for a portion of our management fee. In all cases NorthCoast has a solicitation agreement with such individuals and requires that they provide any prospect with our ADV Brochure, and obtain a signed acknowledgement that the prospect is aware of the fee sharing arrangement.

#### **Item 15 – Custody**

Connectus's agreement and/or the separate agreement with any financial institution may authorize NorthCoast through such financial institution to debit the client's account for the amount of NorthCoast's fee and to directly remit that management fee to NorthCoast in accordance with applicable custody rules.

All client account assets are held by a qualified custodian. These qualified custodians will deliver directly to clients monthly or quarterly account statements summarizing the activity in their accounts and return on their investments. These reports are in addition to the statements clients receive directly from NorthCoast. NorthCoast urges clients to carefully review the statement received from the qualified custodians and compare those to the reports received from NorthCoast.

#### **Item 16 – Investment Discretion**

Virtually, all client assets are managed on a discretionary basis. Clients opening accounts are required to execute an investment advisory agreement that, among other things, grants NorthCoast the authority to manage their assets on a discretionary basis. Clients must establish their own custodial arrangements if they do not wish to use the custodian NorthCoast suggests and provide the custodian with a letter granting NorthCoast the authority to manage their assets. NorthCoast clients can ask to use a broker other than one suggested by NorthCoast by opening a brokerage account with the broker of their choice and providing NorthCoast with written instructions that includes account information. Clients wishing to restrict their accounts from holding certain companies or types of companies must provide written instructions containing a list of the relevant restrictions. All restrictions are handled on a 'best efforts' basis.

#### **Item 17 – Voting Client Securities**

NorthCoast has retained the services of Institutional Shareholder Services (wholly owned subsidiary of RiskMetrics Inc) (“ISS”), an independent proxy-voting service provider, to provide research, recommendations and other proxy voting services for client proxies. Absent a determination by NorthCoast to override ISS’s guidelines and/or recommendations, we will vote all client proxies in accordance with ISS guidelines and recommendations which, per their policies, vote all proxies in the best economic interest of our clients. NorthCoast also retains ISS for its turn-key voting agent service to administer its proxy voting operation. As such, ISS is responsible for submitting all proxies in a timely manner and for maintaining appropriate records of proxy votes. NorthCoast has established a Proxy Committee consisting of three of its principals who have a broad range of experience in the financial services industry to periodically review these policies and procedures. Additionally, in the event that ISS is unable to complete/provide its research regarding a security on a timely basis or NorthCoast has made a determination that it is in the best interests of its clients for NorthCoast to vote the proxy, the Proxy Committee will determine how to vote that proxy.

NorthCoast has engaged Broadridge Global Security Class Actions to handle all class action litigation on behalf of NorthCoast accounts.

### **Item 18 – Financial Information**

NorthCoast derives all of its income from advisory fees as detailed above. The firm does not have any outside or conflicting business interests, nor do its principals or employees hold directorships or board seats in any other businesses. No balance sheet is needed as no advance fees over \$1200 are collected.

# FACTS

## WHAT DOES CONNECTUS WEALTH, LLC DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- n Social Security number and income
- n account balances and transaction history
- n investment experience and account transactions

When you are *no longer* our customer, we continue to share your information as described in this notice.

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Connectus Wealth, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Connectus Wealth, LLC share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

### Questions?

Call us at (646) 560-4000, email us at [info@connectuswealth.com](mailto:info@connectuswealth.com) or go to <https://connectuswealth.com>



## Who we are

<b>Who is providing this notice?</b>	Connectus Wealth, LLC
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## What we do

<b>How does Connectus Wealth, LLC protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
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<b>How does Connectus Wealth, LLC collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>n open an account or give us your income information</li> <li>n tell us about your portfolio or deposit money</li> <li>n enter into an investment advisory contract</li> </ul> <p>We also collect your personal information from other companies, including affiliates.</p>
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<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>n sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>n affiliates from using your information to market to you</li> <li>n sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
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## Definitions

<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies.
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- n *Our affiliates include Focus Operating, LLC, Focus Treasury & Credit Solutions and Connectus Group, LLC.*

<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
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- n *Connectus Wealth, LLC does not share with nonaffiliates so they can market to you.*

<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
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- n *Connectus Wealth, LLC does not jointly market.*

## Other important information

## CONNECTUS WEALTH, LLC

March 29, 2024

### **Item 1. Introduction.**

Connectus Wealth, LLC (“Connectus”) is registered with the United States Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences.

Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers and investing.

### **Item 2: What investment services and advice can you provide to me?**

Connectus provides investment advisory services to retail investors. The principal services we offer are investment management and financial planning services. We tailor your investment management services to match the investment objectives, goals, risk parameters, financial and other information which you provide to us. We monitor the holdings and performance of your account on an as needed basis and your custodian will provide you with quarterly reports regarding the performance and holdings of your account. Connectus will provide account reports during client meetings and may also provide written reports on a periodic or as needed basis. We provide investment management services on a discretionary basis pursuant to authority granted to us in your client agreement. When we provide discretionary investment management services, we are authorized to determine which securities are bought and sold, the total amount to be bought and sold, and the costs at which transactions will be effected. Similar services as those described above are also offered through other names under which we do business (please refer to ADV Part 1A). We do not limit the provision of investment management services or financial planning services to proprietary products. In addition, we generally do not limit the types of investments we utilize for clients, and may use instruments including mutual funds, exchange traded funds, individual equity securities, corporate and other bonds, private funds/illiquid investments and variable annuities. We generally seek a minimum portfolio size or a minimum initial investment of \$500,000 to provide asset management services, but reserve the right to accept clients with portfolios of any size or decline a potential client for any reason, in our sole discretion.

For additional information, please refer to our [Form ADV Part 2A Brochures](#), especially Item 4 Advisory Business, Item 7 Types of Clients, Item 13 Review of Accounts, and Item 16 Investment Discretion.

### **Questions to Ask Us:**

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

***How will you choose the investments that you recommend to me?***

***What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?***

### **Item 3 (part 1): What fees will I pay?**

For investment advisory services we charge an asset based fee billed on a quarterly basis. An asset based fee is a fee that is calculated based on a percentage of the total value of the assets in your account. For an asset based fee, the more assets that are in a client’s advisory account, the more a client will pay in fees. Therefore, we may have an incentive to encourage clients to increase the assets in his or her account. For financial planning services we may charge a fixed fee that is due and payable upon the completion of the financial planning engagement.

In addition to our fees you will be responsible for other fees and expenses, such as, transaction charges and fees/expenses charged by any custodian of your account, subadvisor, mutual fund, exchange traded fund, separate account manager and any taxes or fees required by federal or state law.

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. For additional information, see Item 5 Fees and Compensation of our [Form ADV Part 2A Brochures](#).

**Question to Ask Us:**

*Help me to 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?*

**Item 3 (part 2): What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. For example we may utilize unaffiliated third party solicitors to solicit prospective clients and pay such solicitors a percentage of the fees earned from these solicited clients and are offered products and services from custodians whose custodial safekeeping services we recommend to clients. For additional information on how these or other conflicts may affect you, please refer to our [Form ADV Part 2A Brochures](#), specifically Item 12 Brokerage Practices and Item 14 Client Referrals and Other Compensation.

**Question to Ask Us:**

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

**Item 3 (part 3): How do your financial professionals make money?**

Our financial professionals are paid pursuant to a salary, with some professionals also participating in a bonus structure. The bonus structure takes into consideration factors such as the total financial performance of the firm, the amount of new client assets obtained by a financial professional and generally the revenue the firm earns from the financial professional's advisory services. Financial professionals paid pursuant to a bonus structure that encompasses factors such as increase in firm or client account revenue and increases in managed client assets are subject to a conflict of interest. Since the firm charges an asset-based advisory services fee, the more assets you have in your account the more you will pay in fees and, therefore, the firm and the financial professional have an incentive to encourage you to increase the assets in your account.

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

Yes. You can visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Questions to 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 our Form CRS, please contact Andy Warning at 513-832-5463.

**Questions to 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 a person is treating me?*



Asset Management | A Connectus Partner

**ADV Part 2B: Brochure Supplement**  
**April 2, 2024**

**CONNECTUS WEALTH, LLC**  
**Brochure Supplement for DBA (“doing business as”)**  
**NORTHCOAST ASSET MANAGEMENT**  
**One Greenwich Office Park**  
**Greenwich, CT 06831**  
**(203) 532-7000**

**This brochure supplement provides information about key employees of NorthCoast Asset Management d/b/a of Connectus Wealth, LLC. It supplements Connectus Wealth’s accompanying Form ADV brochure. You should have received a copy of that brochure. Please contact The Compliance Officer if you did not receive Connectus Wealth’s brochure or if you have any questions about the contents of this supplement. Additional information about any of our employees is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



### **Item 1 - Cover Page**

#### **Patrick Jamin, CFA, FRM**

Born: 1972

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

**This brochure supplement provides information about Patrick Jamin that supplements the NorthCoast Asset Management d/b/a of Connecticut Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

**Additional information about any of our employees is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Item 2 - Educational Background and Business Experience**

Patrick Jamin joined NorthCoast Asset Management in January 2012 as Chief Investment Officer and became President of the firm in 2022. In his role he oversees all investment activity including portfolio management and investment research. Previously Mr. Jamin was a Partner at Numeric Investors directing the portfolio management effort for all European Strategies. There he was also a member of the Strategic Alpha Research team and had responsibilities encompassing a wide array of quantitative research projects, as well as managing Numeric's World Fundamental Statistical Arbitrage Strategy. Prior to that Patrick served as a Portfolio Manager at Standard Pacific Capital and as a Senior Quantitative Analyst at AIM Investments. Patrick received an M.B.A. from Harvard Business School with high distinction (2002), a Masters of Science in Telecommunications from Ecole Nationale Supérieure des Telecommunications de Paris (1997), a diploma of "Ingenieur de l'Ecole Polytechnique" from Ecole Polytechnique in Palaiseau, France (1995). Patrick is a CFA<sup>®</sup> charterholder and a certified Financial Risk Manager (FRM).

### **Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Robert E. Wright, CFP®**  
Born: 1977

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

**This brochure supplement provides information about Robert Wright that supplements the NorthCoast Asset Management d/b/a of Connecticut Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

**Additional information about any of our employees is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 - Educational Background and Business Experience**

Graduated Cum Laude from the University of Toledo with a degree in Economics and a business minor focused in Finance. He has run a personal financial planning practice with Ameriprise Financial and was responsible for developing custom financial plans for high net worth individuals in order to meet their personal objectives. While with Ameriprise, Mr. Wright received the Mercury and Outstanding Advisor awards for excellence.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.





### **Item 1 - Cover Page**

#### **Jacob Wick**

Born: 1988

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

**This brochure supplement provides information about Jacob Wick that supplements the NorthCoast Asset Management d/b/a of Connecticut Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

**Additional information about any of our employees is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Item 2 - Educational Background and Business Experience**

Jacob Wick is the Head of Wealth Management, overseeing the private client group & advisory services for NorthCoast's 3,500+ Private Clients. Previously, Jacob was the Senior Advisor for clients in the Midwest region. Since joining NorthCoast in 2011, Jacob has led many of the company's client-first initiatives. He has served in a leadership role as Head of Client Experience, transitioning the company to a personalized service model. Jacob led the effort of building NorthCoast's client portal, providing clients real-time access to their investments including holdings, asset allocation and performance reporting along with helpful insight and information about market commentary, strategy highlights and research reports. Jacob is also the head of NorthCoast's structured settlement investment division. Since its founding in 2017, the program provides attorneys and their clients' tax-deferred investment portfolios through a customized structured program. Originally from the Cleveland area and currently residing in Greenwich, CT, Jacob graduated from Indiana University before pursuing his career in investment management.

### **Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.



### **Item 1 - Cover Page**

#### **Joe Merkle**

Born: 1989

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

**This brochure supplement provides information about Joe Merkle that supplements the NorthCoast Asset Management d/b/a of Connecticut Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

**Additional information about any of our employees is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Item 2 - Educational Background and Business Experience**

Joe graduated from Villanova University, where he completed his BA with a Finance major. Upon graduation, he joined Morgan Stanley Smith Barney's Mutual Fund Operations team, where he handled all metrics and reporting for the department. Joe was responsible for managing several long-term projects and initiative and all budget-related exercises as well. He joined the NorthCoast team in October of 2013 to work with and support the Client Service and Sales team.

### **Item 3 - Disciplinary Information**

None

### **Item 4 – Other Business Activities**

None

### **Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.



### **Item 1 - Cover Page**

**CJ Pepe, CFP®**

Born: 1990

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

**This brochure supplement provides information about CJ Pepe that supplements the NorthCoast Asset Management d/b/a of Connectus Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about any of our employees is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

### **Item 2 - Educational Background and Business Experience**

CJ Pepe is a graduate of Villanova University with a B.A. in Finance. CJ began his career working for the New York Stock Exchange, where he was responsible for business development surrounding the NYSE’s market data partnerships and content offerings to customers of the exchange. In 2015, CJ joined NorthCoast as a Private Client Advisor. He works with individual clients to determine which NorthCoast investment strategy can best suit their needs, including developing solutions for clients who hold large concentrated stock positions in their portfolios. CJ is currently a Vice President in the Private Client group, and obtained his CERTIFIED FINANCIAL PLANNER™ designation in 2018.

### **Item 3 - Disciplinary Information**

None

### **Item 4 – Other Business Activities**

None

### **Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.



**Item 1 - Cover Page**

**Peter Nieporent, CFP®**

Born: 1990

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

**This brochure supplement provides information about Peter Nieporent that supplements the NorthCoast Asset Management d/b/a of Connecticut Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

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**Item 2 - Educational Background and Business Experience**

Peter Nieporent attended Pace University, where he graduated with a BBA in Finance and was captain of the Men's Lacrosse team. After graduation, Peter joined Elizabeth Arden Inc. and worked within their supply chain division for three years. His responsibilities included global inventory planning and managing sales forecast models. Peter joined NorthCoast's Private Client group in 2015 as a Private Client Advisor, working with clients to meet their financial objectives.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.





**Item 1 - Cover Page**

**Frank Ingarra, Jr**

Born: 1971

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

**This brochure supplement provides information about Frank Ingarra that supplements the NorthCoast Asset Management d/b/a of Connecticut Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

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**Item 2 - Educational Background and Business Experience**

Previously, Mr. Ingarra was Co-Portfolio Manager and Head Trader of the entire family of quantitatively managed Hennessy Funds totaling \$900 million in assets. Prior to Hennessy, he served as Head Trader of O'Shaughnessy Capital Management (OCM), a \$1 billion Greenwich investment advisor and mutual fund manager. Frank was awarded an MBA from the Frank G. Zarb School of Business at Hofstra University and holds a Bachelor's degree in Engineering and a minor Business from Villanova University.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

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### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Will Ostruzka**

Born: 1980

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

**This brochure supplement provides information about Will Ostruzka that supplements the NorthCoast Asset Management d/b/a of Connectus Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

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**Item 2 - Educational Background and Business Experience**

Will Ostruzka brings over 10 years of financial consulting experience to the NorthCoast team. Will has been a student of market activity for over a decade and extends valuable insight across multiple asset classes, including equities, fixed income, alternatives, annuities, real estate, and insurance. His advisory background includes tenures with Morgan Stanley, Schwab, and Etrade. Will is part of the focused effort to ensure clients are positioned correctly to meet their financial objectives. Will graduated from the University of Connecticut and lives locally here in Greenwich with his wife and kids.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

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### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Stephanie O'Donnell**

Born: 1987

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

**This brochure supplement provides information about Stephanie O'Donnell that supplements the NorthCoast Asset Management d/b/a of Connectus Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

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**Item 2 - Educational Background and Business Experience**

Stephanie O'Donnell joined NorthCoast Asset Management in 2016 as a Private Client Advisor. Stephanie graduated Magna Cum Laude from Villanova University in 2009. After graduation, she worked as the Education Coordinator with the Boys & Girls Club of Greenwich. Most recently, she was a member of the Marketing and Client Service team at Axiom Investors. As an advisor, Stephanie works directly with new and existing clients to help put together a plan to meet their personal financial objectives

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

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**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Tom Colombo**

Born: 1968

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

**This brochure supplement provides information about Tom Colombo that supplements the NorthCoast Asset Management d/b/a of Connectus Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

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**Item 2 - Educational Background and Business Experience**

Tom Colombo joined NorthCoast Asset Management's Institutional Division in March of 2019. Prior to joining NorthCoast Tom was a financial advisor within Morgan Stanley's Wealth Management division focusing on high net worth individuals and business owners. Before joining Morgan Stanley, Tom owned Universal Business Equipment Corporation, an office supply and contract furniture dealer which he successfully sold in 2013. Tom is a Graduate of Villanova University.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

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**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.



**Item 1 - Cover Page**

**Francis Simms**

Born: 1980

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

**This brochure supplement provides information about Francis Simms that supplements the NorthCoast Asset Management d/b/a of Connectus Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

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**Item 2 - Educational Background and Business Experience**

Francis Simms is a Senior Vice President with NorthCoast covering the state of Florida. Francis' primary efforts are focused on building meaningful relationships and partnering with clients to develop specialized solutions around retirement planning, income generation, and risk management. Francis brings over a decade of financial consulting experience to the NorthCoast team and extends valuable insight across multiple asset classes.

He is a native Floridian and started his career by serving over five years in the US Air Force, where he administered the anti-terrorism program in combat zones. Over the next 11 years, Francis served as Vice President and Senior Financial Consultant at Charles Schwab helping clients reach their financial goals. His financial planning acumen combined with staunch conviction in client service has led him to be the trusted advisor for many families.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

### **Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

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### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.



### **Item 1 - Cover Page**

**Brian Park, CFP®**

Born: 1982

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

**This brochure supplement provides information about Brian Park that supplements the NorthCoast Asset Management d/b/a of Connecticut Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

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### **Item 2 - Educational Background and Business Experience**

Brian Park is a Senior Vice President with NorthCoast overseeing the state of California. He is passionate about helping clients achieve financial success through meaningful conversations and personalized wealth plans. With well over 15 years in the financial services industry, he specializes in developing roadmaps using comprehensive wealth planning techniques and investment management solutions. Brian graduated from the Marshall School of Business at the University of Southern California and is a CERTIFIED FINANCIAL PLANNER™ holding the FINRA series 7, 66, CA Life Insurance as well as the CA Real Estate License. Prior to joining NorthCoast, Brian spent time at a multi-billion dollar asset management firm advising high net-worth individuals and families. Previously he spent 8 years at Wells Fargo's Private Bank, after beginning his career in the real estate development industry with The Pulte Group in 2005.

### **Item 3 - Disciplinary Information**

None

### **Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

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**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Chiraag Kirpalani**

Born: 1988

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

**This brochure supplement provides information about Chiraag Kirpalani that supplements the NorthCoast Asset Management d/b/a of Connectus Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

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**Item 2 - Educational Background and Business Experience**

Chiraag Kirpalani is currently a Private Client Advisor on the Compass Premier team at NorthCoast, joining us from a dual commodity International trading firm where he served as an analyst. Prior to that role, he was with Merrill Lynch at their New York office also as an analyst.

Chiraag is a graduate of Pace University with a B.B.A. in Finance with a double minor in Accounting and Economics and holds the FINRA series 65.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Ryan Morgan**

Born: 1985

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2022

**This brochure supplement provides information about Ryan Morgan that supplements the NorthCoast Asset Management d/b/a of Connectus Wealth, LLC Brochure. You should have received a copy of that brochure. Please contact Chief Compliance Officer if you did not receive NorthCoast Asset Management's brochure or if you have any questions about the contents of this supplement.**

**Additional information about any of our employees is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 - Educational Background and Business Experience**

Ryan Morgan is a Senior Vice President with NorthCoast Asset Management, covering the Mid-Atlantic region. Ryan joined NorthCoast in 2022 with the primary responsibility of providing comprehensive wealth management advice to clients. Ryan brings nearly 15 years of financial service experience to the NorthCoast team with a particular background in comprehensive financial planning & institutional investment management.

Ryan most recently served as Regional Vice President at Fisher Investments where he worked in a similar role servicing HNW clients in North & South Carolina. Ryan earned a Bachelor of Science in Finance from the University of Colorado @ Boulder. He is a CERTIFIED FINANCIAL PLANNER™ professional and holds his Series 66 and Series 7. Ryan resides in Charlotte, NC with his wife and two children.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

### **Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.



**Item 1 - Cover Page**

**Trent Fifield, CFP®, CWS®**

Born: 1972

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

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**Item 2 - Educational Background and Business Experience**

Trent R. Fifield is a Senior Vice President with NorthCoast, overseeing advisory services in the Midwest region. With over 20 years in financial services, Trent specializes in providing comprehensive wealth and investment management solutions.

Trent received his B.S. in Business from Weber State University and is a CERTIFIED FINANCIAL PLANNER™ and Certified Wealth Strategist®, holding the FINRA series 7, 65, 9, 10 along with IL Life and Health insurance licenses. Prior to joining NorthCoast, Trent worked at Charles Schwab as Branch Manager and Financial Consultant.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has

appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Mike Porricelli**

Born: 1995

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2023

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**Item 2 - Educational Background and Business Experience**

Michael Porricelli joined NorthCoast Asset Management as a Private Client Advisor. Prior to joining NorthCoast, Michael previously worked at Neuberger Berman and Ameriprise Financial. Michael received a degree in Economics from the University of Connecticut and holds the FINRA series 7, 66 as well as the CT Real Estate License.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

Mr. Porricelli is also involved in selling real estate, but is not actively soliciting for clients.

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

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**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Andrew Redhead**

Born: 1995

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

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**Item 2 - Educational Background and Business Experience**

Andrew Redhead joined NorthCoast in 2023 as a Private Client Advisor on the Compass Premier team. Prior to joining NorthCoast, Andrew worked for UBS and Northwestern Mutual.

Andrew received his B.A. in Economics from Grinnell College, where he also played 4 years of varsity basketball. Andrew holds the FINRA series 66 and 7 licenses.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

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employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Connor Vlahos**

Born: 1989

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

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**Item 2 - Educational Background and Business Experience**

Connor Vlahos joined NorthCoast Asset Management as Assistant Vice President in 2024, bringing with him over a decade of experience in financial services. Connor specializes in assisting clients in building personalized, comprehensive financial plans through a goal-oriented approach. He works closely with individuals and families, guiding them through all aspects of the financial planning process by combining his investment expertise with a hands-on approach. Before joining NorthCoast, Connor worked for E\*TRADE/Morgan Stanley and Fidelity Investments.

Connor earned his Bachelor's in Business Administration with a major in Finance and a minor in Accounting from the University of Arkansas, in addition to obtaining FINRA Series 66, 7, and 63 licenses.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

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**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.



**Item 1 - Cover Page**

**Gustavo De La Roca**

Born: 1974

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

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**Item 2 - Educational Background and Business Experience**

Gustavo De La Roca joined NorthCoast in 2023 after spending over two decades in the asset and investment management industry. While representing firms like Franklin Templeton Investments and LPL Financial, he has become an accomplished financial services distribution and relationship management professional with significant multi-channel distribution and investment experience. He has implemented a highly consultative approach to managing large-complex and sophisticated investment clients, articulating comprehensive investment solutions while delivering in-depth investment portfolio insights that are laser-focused on improving outcomes.

Gustavo attended Foothill College with a focus in Business Administration in Los Altos, CA, and holds the FINRA Series 65, 7, 63, and 6 securities licenses.

Gustavo is a California native who resides in Los Angeles, CA, with his wife and two children.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

### **Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

### **Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

**Item 1 - Cover Page**

**Kevin Morrissey**

Born: 1975

One Greenwich Office Park  
Greenwich, CT 06831  
203-532-7000

Updated: April 2024

**This brochure supplement provides information about key employees of NorthCoast Asset Management d/b/a of Connectus Wealth, LLC. It supplements Connectus Wealth's accompanying Form ADV brochure. You should have received a copy of that brochure. Please contact The Compliance Officer if you did not receive Connectus Wealth's brochure or if you have any questions about the contents of this supplement. Additional information about any of our employees is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 - Educational Background and Business Experience**

Kevin Morrissey, Vice President at NorthCoast, leads advisory services in the New England territory. With over two decades of experience in financial services, Kevin specializes in providing holistic wealth and investment management solutions. Kevin received his Bachelor of Arts from the Salve Regina University. Before joining NorthCoast, Kevin built strong relationships advising high-net-worth individuals at a multi-billion Registered Investment Advisory institution.

**Item 3 - Disciplinary Information**

None

**Item 4 – Other Business Activities**

None

**Item 5 – Additional Compensation**

None

**Item 6 – Supervision**

Connectus Wealth, LLC has adopted, and periodically updates, a compliance manual that outlines for each employee the various rules and regulations to which they must adhere. Connectus Wealth, LLC has appointed a Chief Compliance Officer who reviews and monitors employee activity with respect to the rules and regulations. In addition, Connectus Wealth, LLC has adopted a Code of Ethics that requires each

employee to act in the client's best interest at all times. Should you have questions related to these activities, please contact the Compliance Officer at (646) 499-8583.

**Item 7 – Requirements for State-Registered Advisers**

Connectus Wealth, LLC is an SEC registered investment adviser; therefore this section is not applicable.

## **ADV Part 2B Appendix**

### **CFA Program Description for Form ADV Part 2B**

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 142,000 CFA charter holders working in 159 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

#### High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

#### Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter-holders often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 23 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

#### Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental

and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

## **CFP Program Description for Form ADV Part 2B**

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at

a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.