

Introduction

Focus Partners Advisor Solutions, LLC (“FPAS”) is registered with the Securities and Exchange Commission as an investment adviser. Fees for brokerage and investment advisory services differ among broker-dealers and investment advisers and it is important that you understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We help service your account(s) by providing turnkey asset management services to your independent registered investment advisors. This means we help your independent advisor with coordinating service requests with custodians, client billing and account reconciliation. We also provide your independent advisors with access to certain investment options, various portfolio management tools and other administrative support to service your account(s). These services may be performed internally or through affiliated and non-affiliated third parties. In exercising some of these services, FPAS may be granted discretion over an individual client account. The details of that discretionary authority is determined on a client by client basis when an account is opened.

We also provide sub-advisory and fixed income sub-advisory services to investment advisors and their clients if requested. We provide various model asset allocation portfolios, fixed income investment allocation recommendations, and investment management services to the registered investment advisors and their clients. For sub-advisory services, we will continuously monitor and provide oversight on the investment accounts for which you have given us such authority. You have the option to either give us discretion to determine the investments to buy and sell or you may retain discretion and make the ultimate decision regarding the investments we purchase or sell on your behalf. You may impose reasonable restrictions on any discretionary authority you provide, which must be provided to us in writing and accepted by us. For fixed income sub-advisory services, we are granted the discretionary authority to select fixed income securities for clients based on the asset allocation provided by the investment advisor and client. Additionally, we provide retirement plan services to participant-directed pension and profit-sharing plans.

Ask us questions to help you better understand our services:

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

Please refer to our **Form ADV Part 2A**, particularly **Items 4 and 7**, for more detailed information about our services.

What fees will I pay?

We charge a percentage of assets under management for portfolio management services for certain clients we have entered into a direct relationship with. These fees are assessed on a quarterly basis, in advance or in arrears. You should be aware that the more assets there are in your account, the more you will pay in total fees although the fee as a percentage of AUM may decrease as your assets increase. This means we have an incentive to encourage you to increase the assets in your account. Additionally, in situations where we do not have a direct relationship with you as a client, you may indirectly pay us through your advisor’s advisory fee.

In addition to our fees, you may incur additional fees and costs related to the investments in your account, such as custodian fees, account maintenance fees, transaction costs, surrender charges, wire transfer and electronic fund fees, internal management fees of mutual funds and variable annuities, and other product fees such as redemption fees.

Ask us questions to help you better understand the impact of fees and costs on investments:

- Help me understand how these fees and costs might affect my investments?
- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?
- How does your fee schedule work in practice?

You will pay fees and costs whether your investments make or lose money. Fees and costs will reduce overall investment returns over time. Please make sure you understand what fees and costs you are paying.

Please refer to our [Form ADV Part 2A](#), particularly Item 5, for more detailed information about our fees and your investment costs.

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 some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

We receive client referrals from third parties and employees to whom we pay referral fees. This is a conflict of interest because we have an incentive to pay referral fees so that these parties will refer clients to us that they otherwise might not refer to us. We also receive compensation for referring retail investors to one other investment adviser that is affiliated with us as a Focus Financial Partners firm. This is a conflict of interest because we have an incentive to refer retail investors to other investment advisers that pay us referral fees rather than those that do not pay us referral fees.

We are also the investment advisor, administrator, and shareholder servicing agent of the SA Funds, a series of open-end mutual funds. FPAS receives fees from each of the SA Funds for providing these services. This is a conflict of interest because it provides an incentive for FPAS to recommend the purchase of the SA Funds rather than other similarly situated mutual funds.

We also have other affiliated businesses that we recommend. This is a conflict of interest because our affiliated businesses receive additional compensation if you choose them for services.

We are fiduciaries to you and are required to act in your best interest throughout our advisory relationship.

Ask us questions to help you better understand our conflicts of interest:

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

Please refer to our [Form ADV Part 2A](#), particularly Items 10, 11, and 12, for more detailed information about our conflicts of interest.

How do your financial professionals make money?

Our financial professionals are compensated with a base salary and have a potential bonus based on existing firm assets under management and in some cases new firm assets. This is a conflict of interest because our financial professionals have an incentive to encourage independent investment advisors to increase the assets in a retail investor's accounts. FPAS's management company (see Item 4 of our Firm's Brochure for further information on the management company) is eligible to receive payments from Focus Financial Partners based on FPAS's level of earnings. The management company can allocate these payments, if received, to any or all of its members, in its discretion. This potential increased compensation provides an incentive for these individuals to encourage you to maintain and even increase the size of your investment account with us.

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

No, please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research our firm and your financial professional.

Ask us questions to help you better understand our disciplinary history:

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

Additional Information

You can find additional information about our services in our [Form ADV Part 2A](#). You may request updated information and a copy of our Relationship Summary by contacting us at (314)725-0455 or FPAScompliance@focuspartners.com.

Ask us questions to help you better understand who to contact with any questions or complaints:

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



Summary of Material Changes to Form ADV Part 2

The most recent update of the Focus Partners Advisor Solutions Brochure was a non-annual updating amendment on January 31, 2026, and had the following material changes since our last annual updating amendment:

- On June 30, 2025, Dan Anderson retired as Chief Financial Officer of FPAS and was replaced by Dhruv Gupta.
- On June 30, 2025, Sal Papa changed roles from Chief Legal and Risk Officer of FPAS to another role at Focus Partners
- On January 1, 2026 FPAS complete the merger of the Weatherstone Capital Management (“Weatherstone”) division of Kovitz Investment Group Partners, LLC (“Kovitz”) into FPAS. Weatherstone is now part of FPAS and will continue to do business as Weatherstone Capital Management within FPAS’s registered investment advisor designation. Kovitz was merged into FPAS’ affiliate, Focus Partners Wealth, LLC. Clients of Weatherstone were formally notified of the merger and assignment of thier management agreements to FPAS. As part of this transaction, this brochure has been updated to add lanaguge specific to how Weatherstone conducts advisory business. Weatherstone maintains a separate Form ADV Part 2A under the FPA’s registration that details their specific business.

Our most recent Annual Updating Amendment was filed on March 31, 2026.

FPAS amends this brochure at least annually. To receive a copy of our most recent brochure at any point during the year, please call the Compliance Department toll-free at (800) 711-2027 or email FPAScompliance@focuspartners.com and a copy will be sent to you without charge.

FACTS

WHAT DOES FOCUS PARTNERS ADVISOR SOLUTIONS, LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial advisory 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 may share depend on the services we provide to you. This information can include:

- Contact information
- Social Security number
- Income-related information
- Account information, such as balance and transaction history
- Assets, investment experience, risk tolerance, and account information
- Tax information
- Payment history
- Retirement assets, checking account information, and employment information

How?

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

All financial advisory companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial advisory companies can share their customer's personal information; the reasons Focus Partners Advisor Solutions, LLC ("Focus Partners Advisor Solutions") chooses to share; and whether you can limit this sharing.

| Reasons we can share your personal information | Can Focus Partners Advisor Solutions share? | Can you limit this sharing? |
|--|---|-----------------------------|
| For our everyday business purposes— such as to process your transactions, maintain the client-advisor relationship and your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes | No |
| For our marketing purposes— to offer our services to you | Yes | No* |
| For joint marketing with other financial companies | No | We don't share |
| For our affiliates' everyday business purposes— information about your transactions and experiences | Yes | No |
| For our affiliates' everyday business purposes— information about your creditworthiness | No | We don't share |
| For nonaffiliates to market to you | No | We don't share |

*We do allow you the option to unsubscribe or opt-out of certain marketing communications with us.

Questions?

Call 800-366-7266 or go to [https:// advisor.focuspartners.com/](https://advisor.focuspartners.com/)

Who we are

Who is providing this notice? Focus Partners Advisor Solutions, LLC

What we do

How does Focus Partners Advisor Solutions protect my personal information? To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include privacy safeguards and secured files and buildings.

How does Focus Partners Advisor Solutions collect my personal information?

We collect your personal information, for example, when you

- open an account and/or give us your income information
- tell us about your investment or retirement portfolio
- deposit or transfer money
- seek financial advice, tax advice or investment advice
- provide employment information
- provide account information
- give us your contact information or pay us via check
- make a wire transfer or money movement authorization
- share your government-issued ID or your driver's license
- enter into an advisory contract or service agreement
- visit our website

When you visit our website, cookies are used to help us understand your preferences based on previous or current site activity, which enables us to provide users with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so we can offer better site experiences and tools in the future. Cookies may also be used by third parties to target advertising on other sites based on users' online activity. We also collect your personal information from other third parties (e.g., our affiliates, or custodians of your accounts).

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes – information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

Definitions

Affiliates Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include Focus Operating, LLC, Focus Risk Solutions, LLC, Sentinel Pension Advisors Inc., and Focus Partners Wealth, LLC.*

Nonaffiliates Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Focus Partners Advisor Solutions, LLC does not share personal information with nonaffiliates for the purpose of marketing to you.*

Joint marketing A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Focus Partners Advisor Solutions, LLC does not jointly market.*

Other important information

If you are a California resident, California law provides you with additional rights. To learn more about your California privacy rights under the California Consumer Privacy Act ("CCPA") as amended by the California Privacy Rights Act ("CPRA"), please see our CCPA Privacy Notice: <https://advisor.focuspartners.com/disclosure-brochures/>.