# Introduction

We are Sentinus-Halo Securities, LLC ("S-H Securities"), a FINRA-registered broker-dealer. Brokerage 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 <u>Investor.gov/CRS</u>, which also provides educational materials about broker-dealers, investment advisers, and investing. Our firm and financial professionals' registration information are also publicly available on the <u>Investor.gov</u> website.

## **Relationships & Services**

### **Q:** What investment services and advice can you provide me?

A: We offer brokerage services to retail clients and to a variety of corporate and legal entities such as trusts, IRAs, partnerships, and small companies. Through our clearing firm we assist you in opening the right type of account for your needs, assist in transmitting signed paperwork to our clearing firm, and assist with money movement activity and related requests (i.e., requesting checks drawn on your account, transmitting wires, establishing ACH privileges).

Our services are non-discretionary in nature and do not involve us taking any discretion on the purchase or sale of securities. We offer advice on a full suite of securities, including equities, fixed income, options, annuities, real estate investment trusts ("REITs"), structured notes, and private placements.

We are incentivized to utilize mutual funds that carry 12b-1 fees, as this represents additional compensation to us. You do not pay transaction costs but receive an overall net return that is lower by the amount of the 12b-1 fee.

### Q: Given my financial situation, should I choose a brokerage service? Why or why not?

A: Our investment advice is for those investors who do not require continuous portfolio supervision. Our recommendations are based upon your financial circumstances, income, net worth, investable assets, investment objectives, and tolerance for risk. Our business is transaction oriented and our compensation is the commission we earn on each transaction. As a result, we are economically incentivized to effect a higher number of transactions for you.

### Q: How will you choose investments to recommend to me?

A: We choose investments that are in your best interest given your investment preferences, financial circumstances, income, net worth, investable assets, investment objectives, and tolerance for risk. Generally, we do not provide ongoing portfolio monitoring, but we do monitor options positions, as they require periodic rolling over to a new expiration month, or the options get assigned and we must take further actions.

### **Q:** What is your relevant experience, including your licenses, education, and other qualifications?

A: Our financial professionals have been in the financial services industry for several years and maintain the Series 7 and Series 63 exam qualifications. Certain supervisory professionals also maintain applicable FINRA supervisory licenses, such as the Series 24, 27, or 28 exam qualification. You can find information on any professional designations of your financial professional by accessing <u>FINRA.org</u> and utilizing the BrokerCheck functionality.

### Q: What do these qualifications mean?

A: These qualifications assure that our professionals have met specific regulatory exam requirements and continuing education requirements to conduct securities activities.

# Fees, Costs, Conflicts & Standard of Conduct

### Q: What fees will I pay?

- A: Our fees for securities transactions are commission based so that we only generate revenue when you effect a securities transaction. Commissions may vary depending on the type of security and the amount and price of the security. In addition to paying commissions, there are separate charges for establishing and maintaining IRA accounts. If you trade on margin, we earn a portion of the margin interest charged your account. If you keep uninvested cash in your account, we earn a portion of the interest that is credited to your account (interest on free credit balance). In addition, there are postage and handling fees, SEC fees, transfer tax fees, and similar fees on a per transaction basis. Also, you may be assessed inactivity fees should your account be dormant for some period of time.
- Q: Help me understand how these fees and costs might affect my investments. If I give you \$100,000 to invest, how much will go to fees and costs, and how much will be invested for me?
- A: Commissions are added to your purchase transactions or subtracted from your sales proceeds on a per transaction basis. This results in an economic incentive to have you trade more frequently. The more you trade, the higher your costs, which will adversely impact your gains or losses, as applicable. In addition, certain types of securities transactions such as private placements, REITs, and other illiquid securities generally carry a much higher commission cost than

publicly traded securities. In addition, you should be mindful of minimum commission amounts on a per trade basis. Trades for low dollar amounts could cause you to pay an excessive amount of commission relative to the total cost of the securities you are transacting.

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. You are encouraged to speak with your financial representative to understand the costs involved in trading securities.

# Q: What are your legal obligations to me when acting as my broker-dealer? How else does your firm make money and what conflicts of interest do you have?

- A: When we act as your broker, we must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts of interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide. Here are examples to help you understand what this means:
  - Commissions create an incentive for us to recommend that you trade more frequently, which may be contrary to
    your interests. Please be mindful of the impact of trade frequency and commission costs on your portfolio and the
    adverse impacts frequent trading can have on your portfolio returns.
  - S-H Securities has an investment adviser affiliate, Sentinus, LLC. We may recommend either a brokerage account
    or an advisory account to you. You should consider the size of your portfolio, the number of securities, whether or
    not you want ongoing supervision of the portfolio, and the expected level of transaction activity before deciding on
    brokerage versus investment advisory. Please consult with your financial advisor and carefully review this client
    relationship summary and the public disclosure site at <u>Investor.gov/CRS</u>. please see Items 10, 11, and 14 of our
    affiliate's ADV Part 2A Brochure as well as your financial advisor's Part 2B Brochure Supplement for additional
    information about conflicts of interest.

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

A: Conflicts of interest can incentivize us to put our interests ahead of yours. We manage these conflicts through disclosures in this Form CRS, as well as product-specific disclosures (i.e., mutual funds, ETFs, private placements, REITs, and other illiquid securities). In addition, we employ supervisory procedures to ensure our financial professionals are acting in your best interest.

### Q: How do your financial professionals make money?

A: Our financial professionals are paid a percentage of the total commission generated from their client accounts. The payment of commissions reduces your rate of return or increases your loss on securities transactions,

## **Disciplinary History**

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

A: Yes, certain of S-H Securities' financial professionals have a disciplinary record, which can be viewed by accessing Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

**Additional Information** 

### Q: Who is my primary contact person?

# A: Your S-H Securities financial professional will be your primary point of contact. However, administrative requests may be handled by an administrative assistant or client service professional.

### Q: Is he or she a representative of an investment adviser or a broker-dealer?

A: Certain of our investment professionals are registered with our affiliate, Sentinus, LLC. All of our registered representatives are licensed with S-H Securities.

### Q: Who can I talk to if I have concerns about how this person is treating me?

A: In the event you have issues to be addressed, you may contact Mr. Phil Johnson at 630-448-5711 or by email to phil.johnso@sentinus.com.

You can find additional information about our investment services at <u>Investor.gov/CRS</u>. You may also request a printed copy of this Client Relationship Summary by contacting us at 630-448-5711 or via email to phil.johnson@sentinus.com.

# Regulation Best Interest Disclosure Statement

### Introduction

You are receiving this disclosure statement because you have either received a recommendation from our broker-dealer division or you have elected to open a retail brokerage account through Sentinus-Halo Securities, LLC ("S-H Securities"). We are acting as your broker-dealer to provide brokerage services. You acknowledge that you have received the S-H Securities Client Relationship Summary. Please see the following description of our brokerage services and related conflicts of interest.

## **Services**

We offer the following services to retail clients and to a variety of corporate and legal entities, such as trusts, IRA's, partnerships, and small companies. Through our clearing firm, Hilltop Securities Inc., we assist you in opening the right type of account for your needs, assist in transmitting signed paperwork to our clearing firm, provide trade execution and clearing, trade settlement monthly reporting of transactions, money balances, and securities holdings. In addition, we assist with money movement activity and related requests (i.e., requesting checks drawn on your account, transmitting wires, establishing ACH privileges). You may obtain information on our firm by accessing Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Our services are non-discretionary in nature and do not involve us taking any discretion on the purchase or sale of securities. We offer advice on a full suite of securities, including equities, mutual funds, exchange-traded funds ("ETFs"), fixed income, options, annuities, real estate investment trusts ('REITs"), structured notes, and private placements. Mutual funds and ETFs carry additional embedded costs, which have an adverse impact on your investment rate of return.

## **Securities Recommendations**

We recommend investments based upon your individual suitability requirements, such as individual circumstances, liquid net worth, total net worth, annual income, expectation of current and future cash needs, investment objective, and risk tolerance.

## **Portfolio Monitoring**

Although S-H Securities brokers may monitor individual security positions for your account, particularly those with higher volatility, we generally do not provide ongoing portfolio monitoring. If you have a diverse portfolio and prefer to have your broker provide continuous monitoring of your portfolio, you should consider establishing an investment advisor relationship with our firm under a separate investment advisory agreement.

## **Costs & Related Conflicts**

For our brokerage services, you pay a commission each time you effect a securities transaction. Bear in mind that your commission costs increase with the number of securities transactions you effect. Commissions on a per trade basis are typically higher than a fixed transaction-based fee that you would pay as an advisory client. Commission costs cover the firm's cost, compensation to your broker, and a profit to S-H Securities. As a result, there is an economic incentive to effect more trades for a brokerage customer. As a result, there is an economic incentive to effect more trades for a brokerage customer. As a result, there is an economic incentive to effect more trades for a brokerage for a brokerage customer. As a result, there is an economic incentive to effect more trades for a brokerage customer. As a result, there is an economic incentive to effect more trades for a brokerage customer. As a result, there is an economic incentive to effect more trades for a brokerage customer. As a result, there is an economic incentive to effect more trades for a brokerage customer. As a result, there is an economic incentive to effect more trades for a brokerage customer. Please consult your S-H Securities broker for the commission costs, as they vary depending the on the price of security and the number of shares effected.

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.

## **How S-H Securities Makes Money**

We must act in your best interest and not put our interests ahead of yours. The way we make money creates some conflicts of interest. Bear in mind that certain types of securities may generate a higher commission cost versus other types of securities, which creates conflicts of interest in that we are incentivized to recommend those securities that provide a greater economic benefit to S-H Securities. In addition to commission costs, there are separate charges for establishing and maintaining IRA accounts. Mutual funds that we recommend typically include embedded distribution fees, commonly called 12b-1 fees. These fees are paid to S-H Securities, which in turn shares a portion of that fee with its brokers. If you carry a margin balance, you will be charged margin interest on the outstanding balance. S-H Securities is paid a portion of the margin interest that we collect from you. If you trade on margin, please understand that margin trading allows you to own more securities than you could own if you paid for the securities in whole. In this regard, S-H Securities is incentivized for you to trade on margin. If you keep uninvested cash in your account, you receive interest on the outstanding balance in which we earn a portion of the interest that is credited to your account (interest on free credit balance). In addition, there

are miscellaneous fees such as postage and handling fees, SEC fees, transfer tax fees, and similar fees on each transaction effected for your account. Also, you may be assessed inactivity fees should your account be dormant for some period of time. You should understand and ask us about these conflicts because they can affect the investment advice we provide.

## **Additional Disclosure Materials**

There are additional disclosure materials available to you that supplement this disclosure statement. When you establish an account with S-H Securities, our clearing firm, Hilltop Securities, requires you to sign new account documentation which includes disclosures regarding the operation of the account and the legal obligations you and Pershing have with respect to the opening and maintenance of the account. In addition, there are product-specific disclosures when you purchase certain types of investments, such as new issues, mutual funds, ETFs, REITs, private placements of securities, and variable annuities. These disclosures are provided in a prospectus or offering document and contain important information about the investment, its risks, conflicts of interest, legal structure, and those responsible for managing the investment vehicle. You are encouraged to read this material and consult your broker with any questions you have.

## **Broker Compensation**

Our brokers providing brokerage services are paid a commission based upon the transactions effected in their brokerage customers' accounts. Some of our professionals are paid a salary and bonus. In either compensation arrangement, we are economically incentivized to effect a higher number of transactions in your brokerage account or utilize securities or investment products or strategies that carry higher commission costs or fees.

# **Disciplinary History**

Certain S-H Securities professionals have disciplinary disclosures. You can visit <u>Investor.gov/CRS</u> for a free and simple search tool to research our firm and our financial professionals.

# **Additional Information**

Your S-H Securities broker will be your primary point of contact. However, administrative requests may be handled by an administrative assistant or client service professional.

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