



Sentinel Capital Solutions, Inc.

Form ADV Part 2A – Disclosure Brochure

Effective: May 29, 2015

This Disclosure Brochure provides information about the qualifications and business practices of Sentinel Capital Solutions, Inc. ("Sentinel"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (301) 665-9038.

Sentinel is a registered investment advisor located in the state of Maryland. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Sentinel to assist you in determining whether to retain the Advisor.

Additional information about Sentinel and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov.

Sentinel Capital Solutions, Inc.
CRD No: 157844
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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Sentinel.

Sentinel believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Sentinel encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

There have been no material changes to this Disclosure Brochure since the last distribution to Clients.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Sentinel.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

To review the firm information for Sentinel:

- Click **Investment Adviser Search** in the left navigation menu.
- Select the option for **Firm** and enter **157844** (our firm's CRD number) in the field labeled "Firm Name or CRD# or SEC#" and click "Start Search".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the Form ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (301) 665-9038.

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Item 4 – Advisory Services

A. Firm Information

Sentinel Capital Solutions, Inc. (“Sentinel” or the “Advisor”) is a registered investment advisor located in the state of Maryland, which is organized as a corporation under the laws of the state of Maryland. Sentinel was founded in April 2011, and is owned and operated by Cort F. Meinelschmidt, President of Sentinel. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Sentinel.

B. Advisory Services Offered

Sentinel offers investment advisory services to individuals and high net worth individuals (“Client”) through managed accounts, sub-advisory services through other investment advisors or as the Advisor to the SCS Tactical Allocation Fund (herein the “Fund”).

Mutual Fund Advisory

The Fund is an open-end registered investment management company organized as a series of the Starboard Investment Trust (herein the “Trust”). Subject to general supervision by the Board of Trustees of the Trust (herein the “Board”) and in accordance with the investment objectives, policies and restrictions of the Fund, the Advisor provides the Fund with investment management and administrative oversight.

The Fund may invest in any market that Sentinel believes offers a high probability of return, or that provides a high degree of safety in uncertain times. While taking an active approach to risk management, the portfolio manager uses a “top-down” investment style, allocating among asset classes (i.e. fixed income, REIT’s, cash, large-, mid-, small-, and micro-cap equities, precious metals). After determining allocations, the Advisor seeks attractive opportunities within each market. The Fund, which intends to achieve gains rivaling long term equity returns through a variety of products and investment styles, is designed to have a “go anywhere” style that allows the Advisor to dynamically manage allocations among themes and asset classes to potentially provide competitive returns with less risk than the overall stock market.

The Fund seeks to achieve its objective by allocating its assets among primarily stocks, corporate and municipal bonds, REITs, treasuries, American depository receipts (ADRs), ETFs, TIPS, bullion, CDs, structured CDs, ETNs, and CMOs. The Advisor intends to restrict the portfolio to no more than fifty (50) equity holdings. In most cases the fund will be fully diversified; however, the Advisor reserves the right to adjust allocations based on market swings to meet the fund’s primary objectives.

A full description of the services provided by the Advisor for managing the Fund is available in the current prospectus and statement of additional information (“SAI”) of the Fund. The prospectus and statement of additional information are available from the SEC website (www.SEC.gov) or by contacting Shareholder Services at (800) 773-3863.

Individual Managed Accounts

Sentinel provides customized investment advisory solutions for its Clients. Services may be offered directly to a Client. A direct relationship with a Client is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related services. Services may also be offered through a dual contract arrangement in which the Advisor manages a portfolio through an unaffiliated financial advisor other than Sentinel. In these arrangements, the Client will enter into an investment advisory agreement with Sentinel, and Sentinel will assist and advise the Client in establishing investment objectives and monitoring such investments through the unaffiliated Financial Advisors, the Client’s custodian and account[s]. The unaffiliated financial advisor will collect a fee from the Client and Sentinel will receive a portion of that fee for these services. Sentinel works to identify individual investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio to meet the goals and objectives of each Client.

Sentinel’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Sentinel will construct, implement and monitor the portfolio to ensure it meets the goals, objectives,

circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

Sentinel evaluates and selects securities for inclusion in Client portfolios only after applying their internal due diligence process. Sentinel may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Sentinel may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio.

Sentinel may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Prior to rendering investment advisory services, Sentinel will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].

Sentinel will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Sentinel accept or maintain custody of a Client's funds or securities except for authorized deduction of the Advisor's fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement.

Sub-advisory Services

The Advisor's Tactical Allocation Model will also be made available through sub-advisory relationships at select broker/dealers and investment advisors, and will be provided indirectly to investors through Clients registered as investment advisors under the Advisers Act of 1940 through the servicing of their own clients ("Client Advisor"). Sentinel will be responsible for performing research on the economy, markets and securities in order to provide a model portfolio, included recommended securities and industries as well as their respective allocations. Recommendations for substitute securities may also be provided for situations in which the Client Advisor deems it impossible or unwise to buy the main recommendations (i.e. a holding is unsuitable for one of their clients). A brief commentary on the rationale will also be provided with the recommendation.

In these arrangements Sentinel is not obligated to have, nor does it foresee having, any relationship directly with, or obligation directly to, Investors or to implement any of its recommendations. It will provide recommendations to the Client and the broker/dealer (or RIA). The Client Advisor will be responsible for suitability, trading and delivery of Sentinel's brochure, if applicable.

Commentaries

Sentinel also provides Clients of Sentinel a published monthly update of market commentary. This service is a continuation of the *Commentary* that Charles A Knott, Jr. has been providing to clients since 1988. The periodical focuses on macro-economic events and risk-reward relationships. The points made in these articles will be used for guidance in the management of certain Client accounts as determined with the Client. No fee is charged for this service.

C. Client Account Management

Mutual Fund Advisory

Clients can obtain the services of Sentinel by becoming a shareholder of the Fund or by engaging the Advisor for a managed account. Subscription details for the Fund are provided in the Fund's prospectus.

Individual Managed Accounts

- Establishing an Investment Advisory Agreement – Prior to engaging Sentinel to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the

Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – Sentinel, in connection with the Client, will develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Portfolio Construction – Sentinel will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Sentinel will provide investment management and ongoing oversight of the Client's portfolio and overall account.

Sub-advisory Services

Sub-advisory services are obtained when an unaffiliated Client Advisor hires Sentinel to manage all or part of your account with the unaffiliated Client Advisor. In these arrangements, the Client deals with their Client Advisor; Sentinel's relationship is with the Broker Dealer or Client Advisor. Sentinel will coordinate with the Client Advisor regarding Sentinel's model portfolio information, which is then responsible for implementing it in Client's account[s].

D. Wrap Fee Programs

Sentinel may absorb transaction fees for discretionary trading within its mutual funds and managed accounts. The inclusion of the mutual fund fees and securities transaction fees into a single fee is typically considered a "Wrap Fee Program". Please see Appendix I – Wrap Fee Brochure, which is included with this Disclosure Brochure.

E. Assets Under Management

As of December 31, 2014, the most recent date for which such calculations are provided pursuant to securities regulations, Sentinel manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$34,271,764
Non-Discretionary Assets	--
Total	\$34,271,764

Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Sentinel and the Client.

A. Fees for Advisory Services

Mutual Fund Advisory

Fees charged to mutual fund clients are set by the Board and shareholders of the Fund and are subject to review and approval as provided by the Investment Company Act of 1940. For its advisory services to the Fund, the Advisor receives a management fee calculated as a percentage of the average daily assets of the Fund of 1.00% per annum. Sentinel may also receive distribution fees from Capital Investment Group, Inc. ("CIG"), the distributor of the Fund, for sales and distribution services of Class A shares of the Fund.

Class A shares of the Fund have an initial sales load of 4.75% of the initial offering price at the date of purchase into the Fund. The Fund also has a 12b-1 fee of 0.25% per annum that is paid to third parties that market and distribute the Fund. The Fund does not impose fees for redemption of Fund shares. Details of these fees are included in the Fund's prospectus.

Other operating expenses of the Fund are paid to Sentinel, who in turn shall pay all contractual fees to the Fund's service providers. Fees are negotiated separately on behalf of each series and approved annually at an in-person meeting of the Boards. Fees are paid monthly in arrears. The Board must annually approve any Advisory contract for the Fund. Additional information regarding the fees and expenses of the Fund are detailed in the Fund's prospectus.

Individual Managed Accounts

Investment advisory fees are paid monthly in arrears or quarterly in advance pursuant to the terms of the investment advisory agreement. For Clients engaging with Sentinel through a dual contract arrangement where Sentinel manages a portfolio through a financial consultant, the financial consultant may require that fees be paid quarterly in advance. Investment advisory fees are based on the market value of assets under management at the beginning of each calendar quarter if billing in advance, or end of each calendar month for arrears. Investment advisory fees range from 0.75% to 1.50% for directly managed accounts depending on the size and complexity of the Client relationship. For services obtained through a dual contract arrangement, a wrap program that is sponsored by an outside manager but managed by Sentinel, investment advisory fees range from 0.60% to 1.10%. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. Certain legacy Clients may have a flat fee arrangement for Investment advisory fees.

Investment advisory fees in the first billing period of service are prorated to the inception date of the account to the end of the first billing period. Fee amount and structure may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. The designated custodian will independently value all securities held in accounts managed by Sentinel. Sentinel will not have the authority or responsibility to value portfolio securities.

Sub-advisory Services

For Clients engaging with Sentinel for Sub-advisory Services, the Client's fee will range from 0.4% to 1.0% and will be deducted from the Client's account[s] by the respective broker/dealer or Client Advisor. The total fee charged to the Client by the broker/dealer or Client Advisor will be above and beyond Sentinel's fee. Sentinel has no control over the fee charged by the broker-dealer or Client Advisor.

Commentaries

No fee is charged for this service.

B. Fee Billing

Mutual Fund Advisory

Management Fees are paid monthly in arrears. As noted above, other operating expenses of the Fund are paid to Sentinel, who in turn shall pay all contractual fees to the Fund's service providers. Fees are negotiated separately on behalf of each series and approved annually at an in-person meeting of the Boards. Fees are paid monthly in arrears. The Board must annually approve any Advisory contract for the Fund. Additional information regarding the fees and expenses of the Fund are detailed in the Fund's prospectus.

Individual Managed Accounts

Investment advisory fees are typically paid monthly in arrears or quarterly in advance, depending on the terms of the agreement signed, and will be automatically deducted from the Client account by the custodian. While Sentinel typically deducts its fees monthly in arrears, external managers may require billing quarterly in advance. In most cases, the Advisor shall send an invoice to the custodian indicating the amount of the fees to be deducted from the Client account at the respective month end or quarterly start date. The amount due is

calculated based on the customary calculation methods of the custodian chosen by the Client. For most Clients this is done by applying the daily rate (annual rate divided by 365), multiplied by the number of days in the period, to the total assets under management with Sentinel at the beginning or end of each billing period. Clients will be provided with a statement, at least quarterly, from the custodian reflecting deduction of the investment advisory fee.

It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume this responsibility. Clients provide written authorization permitting Sentinel to be paid directly from their accounts held by the custodian as part of the investment advisory agreement and separate account forms provided by the custodian.

Sub-advisory Services

Fees for Sub-advisory Services are billed monthly in arrears, or as otherwise required by the broker/dealer or Client Advisor. The broker/dealer or Client Advisor, or their designee, will be responsible for billing clients under the terms of the agreement they have with the client.

C. Other Fees and Expenses

Mutual Fund Advisory

Clients may incur additional account fees as shareholders in the Fund. These fees are described in the Fund's prospectus.

Individual Managed Accounts

Clients may incur certain fees or charges imposed by third parties, other than Sentinel in connection with investment made on behalf of the Client's account[s]. The investment advisory fee charged by Sentinel is separate and distinct from custodian and execution fees, other than the investment advisory fee charged pursuant to Sentinel's Wrap Fee Program. Further information on fee responsibilities can be found in the Investment Advisory Agreement.

Sub-advisory Services

Fees for Sub-advisory Services charged by Sentinel are separate of the fees charged by the broker/dealer and Client Advisor.

In addition, all fees paid to Sentinel for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Sentinel will not charge an Investment Advisory Fee for managed account assets that are also invested in the Fund.

D. Advance Payment of Fees and Termination

Mutual Fund Advisory

Sentinel is compensated for its services at the end of the month in which investment advisory services are rendered. Clients may redeem their shares in the Fund at net asset value, pursuant to the guidelines set forth in the Fund's prospectus. The Fund does not impose a redemption fee for shareholders that wish to redeem their shares of the Fund.

Individual Managed Accounts

Sentinel may be compensated for its services at the end of the month after investment advisory services are rendered. For some services, Sentinel may also be compensated for its services at the beginning of the quarter before investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with Sentinel, in whole or in part, by providing advance written notice.

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Clients billed in arrears shall be responsible for investment advisory fees up to and including the effective date of termination. Clients billed in advance will receive a pro rata refund for days billed where services were not provided to the Client. The Client's investment advisory agreement with the Advisor is non-transferable without Client's written approval.

Sub-advisory Services

Sub-advisory Services are billed in arrears, and are not charged in advance. If they would be under any new program, refunds would be handled in accordance with the agreement between the broker/dealer or Client Advisor and their client.

E. Compensation for Sales of Securities

Sentinel serves as the Advisor to the Fund and its portfolio manager also serves as a registered representative of CIG, the distributor of the Fund. Sentinel's advisory persons distribute Class A shares of the Fund through financial intermediaries. The registered persons of Sentinel are not typically compensated based on the level of sales by these intermediaries, nor are they typically compensated by commissions for distribution of the Fund. They are compensated from the management fees earned by the Fund as described above and detailed in the Fund's prospectus. Ms. Caniford, in her separate capacity as a registered representative may receive a commission for distribution of the Fund to persons with accounts that are not managed by Sentinel. For individual managed accounts, registered persons of Sentinel may receive compensation for sales of securities as noted in Item 10 below.

This may present a conflict of interest where a commission is earned for sales of securities. Clients are not obligated to implement any recommendation provided by the advisory persons, and may purchase investment products recommended by advisory persons through another source. Neither the Advisor nor its advisory persons will earn investment advisory fees in connection with any services implemented in their separate capacity as a registered representative where commissions are earned.

Item 6 – Performance-Based Fees and Side-By-Side Management

Sentinel does not charge performance-based fees for its investment advisory services. The fees charged by Sentinel are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

Item 7 – Types of Clients

Sentinel provides investment advisory services to the SCS Tactical Allocation Fund ("Fund"), a registered investment company under the Investment Company Act of 1940. Sentinel also provides investment advisory services to individual investors, and to broker/dealers and Client Advisors through Sub-advisory Services. For the Fund, the minimum initial investment is \$100 for investors that sign up for the automatic investment plan, \$1,000 for IRA investors, and \$2,000 for all other investors. The minimum subsequent investment for all investors is \$100. There are no minimum required assets under management.

In general, individually managed accounts are provided only to households who have an aggregate of \$100,000 under management. The Advisor reserves the right to waive this requirement in its sole discretion. All Clients in individually managed accounts are required to sign a Client account agreement.

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

A. Methods of Analysis

Sentinel employs a combination of fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Sentinel is derived from numerous sources, including

financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, Sentinel generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Sentinel will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Sentinel may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Sentinel will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Technical analysis seeks to predict a future prices or direction of an investment's value based on market trends. A risk of technical analysis methods is that the markets do not always follow patterns and relying solely on this method may not work long term. As such, the Advisor does not solely rely on this method.

Each Client engagement other than Sub-advisory Services will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Specific risks related to certain small-capitalization investments are noted below.

Micro- and Nano-Cap Equity Securities

While all investments involve risk, investing in stocks of small companies, such as micro and nano cap equities, involve additional risks. Smaller companies typically have a higher risk of failure, and are not as well established as larger blue-chip companies. Some of these companies have no assets, operations or revenues. Others have products and services that are still in development or have yet to be tested in the market. Another risk that pertains to microcap stocks involves the low volume of trades. Because many microcap stocks trade in low volumes, any size of trade can have a large percentage impact on the price of the stock. Historically, smaller-company stocks have experienced a greater degree of market volatility than the overall market average.

Alternative Investments

Subject to suitability, select advisors may make recommendations to clients under their separate capacity as Registered Representatives of Capital Investment Group to purchase alternative investments. The performance of alternative investments, such as REITs, BDCs and Limited Partnerships, can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated

positions and may carry higher risks. Clients should only have a portion of their assets in these investments and may be subject to additional net worth or income requirements. The client should expect to hold these investments for the long term. Clients will receive additional documents regarding the specific risks of these investments.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

Sentinel and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

To review the firm information contained in Form ADV Part 1, select the option for “Investment Adviser Search”, then selecting “Firm” and enter **157844** in the field labeled “Firm Name or CRD# or SEC#”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

One of Sentinel’s management persons, Cort Meinelschmidt, was involved in two customer disputes, one which was denied, and the other which was settled out of court.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Certain advisory persons of Sentinel are also registered representatives of Capital Investment Group (herein “CIG”) of Raleigh, North Carolina. CIG is a registered broker-dealer (CRD No. 14752), member FINRA, SIPC. In their separate capacity as a registered representative, the advisory persons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the advisory persons. Neither the Advisor nor its advisory persons will earn investment advisory fees in connection with any services implemented in their separate capacity as a registered representative where commissions are earned.

Insurance Agency Affiliations

Certain advisory persons also serve as insurance professionals. This activity is done separate and apart from their role with Sentinel. As an insurance professional, the advisory person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the advisory person or the Advisor.

CPA

Jullie Caniford, an advisory person of Sentinel, is also a licensed CPA. Tax planning and preparation services are offered by Jullie as an outside business activity, and not through Sentinel Capital Solutions, although some clients of Sentinel may also choose to work with Jullie for these services. Jullie does not offer any attestation or auditing services. Sentinel believes that no material conflict of interest arises as a result of her CPA activities.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

Sentinel Capital Solutions, Inc.
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Sentinel has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Sentinel. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Sentinel and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Sentinel associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (301) 665-9038.

B. Personal Trading with Material Interest

Sentinel allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients of the Fund. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, Sentinel has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. Sentinel has also adopted written policies and procedures to detect the misuse of material, non-public information. Sentinel may have an interest or position in certain securities, which may also be recommended to you. **At no time, will Sentinel or any associated person of Sentinel, transact in any security to the detriment of any Client.**

C. Personal Trading in Same Securities as Clients

Sentinel allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients of the Fund. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, Sentinel has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, employees of Sentinel may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Sentinel requiring reporting of personal securities trades by its employees for review by the employee's supervisor or the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

D. Personal Trading at Same Time as Client

While Sentinel allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards.

At no time will Sentinel, or any associated person of Sentinel, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

Mutual Fund Advisory

Sentinel serves as the Advisor to the Fund. Pursuant to a management agreement approved by the Fund's Board, Sentinel has the responsibility to buy and sell securities on behalf of the Fund, determine the amount of securities to be bought and sold, which dealers and brokers to use, and negotiate commissions to be paid. Broker-dealers are selected if they have the capability to execute transactions on behalf of the Fund using its best efforts to seek the best overall terms available. All factors are considered in the selection process including but not limited to, the breadth of the market in the security, the price of the security, the financial condition and

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execution capability of the broker-dealer, anonymity and confidentiality, promptness, the quality of any research provided, the net results of specific transactions, the difficulty in the execution, the size of the order, the operational facilities of the broker-dealer, the broker-dealer's risk, and the reasonableness of commissions. Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Sentinel does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

2. Brokerage Referrals - Sentinel does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. Directed Brokerage - Brokerage relationships for the Fund are established by the Advisor and reported to the Fund's Board. All managed account Clients are serviced on a "directed brokerage basis", where Sentinel will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, Sentinel will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

Individual Managed Accounts

For individual managed accounts, Sentinel does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Sentinel to direct trades to this Custodian as agreed in the investment advisory agreement. Further, Sentinel does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Sub-advisory Services

Sentinel does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for Clients or Client Advisors engaged for Sub-advisory Services.

Where Sentinel does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by Sentinel. Sentinel may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the Custodian's offices. Sentinel does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Sentinel will execute its transactions through an unaffiliated broker-dealer selected by the Client. Sentinel may aggregate orders for managed accounts in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts. The Advisor will generally place trade for the Fund separately from managed accounts Clients. Additional information is contained in the Fund's prospectus and statement of additional information.

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Item 13 – Review of Accounts

A. Frequency of Reviews

Securities are monitored on a regular and continuous basis by Sentinel. Accounts are monitored on a regular, periodic basis by Mr. Meinelschmidt, President and Portfolio Manager of Sentinel; Mr. Charles A. Knott, Jr., Co-Chief Investment Officer and Portfolio Manager of Sentinel; and/or Jullie A. Caniford, Financial Advisor. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

Clients engaged for Sub-advisory Services will have their accounts reviewed according to the practices of their respective Client Advisor. Sentinel will provide updated model portfolio information to the Client Advisor via their broker/dealer at least monthly.

In addition, the Advisor provides detailed information to the Fund's Board regarding the portfolio securities purchased on behalf of the Fund and their relative performance against certain established benchmarks, peer groups and appropriate composites.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Sentinel if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

Shareholders of the Fund will receive statements on a quarterly basis from Nottingham Shareholder Services, LLC, the transfer agent of the Fund. At any time, a shareholder may receive information regarding the share held and the value of their account by calling (800) 773-3863. Additionally, managed account Clients will receive reports from their designated custodian at least quarterly. Clients may also view their accounts online.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Sentinel

Economic Benefits - Research

The Advisor has entered into relationships with JP Morgan Chase & Co., Deutsche Bank, and Aegis Capital Corp, where Sentinel receives access to research at no cost to the Advisor or its clients. At no time will these firms solicit a relationship or products to Clients of the Advisor. The Advisor does not believe that these benefits constitute a "soft dollar" relationship.

B. Client Referrals from Solicitors

Sentinel does not engage paid solicitors for Client referrals.

Item 15 – Custody

Sentinel does not accept or maintain custody of any Client accounts, except for the authorized deduction of the advisor's fee. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Sentinel to utilize that custodian for the Client's security transactions. Sentinel encourages Clients to review statements provided by the account custodian. For more

information about custodians and brokerage practices, see “Item 12 - Brokerage Practices”.

Item 16 – Investment Discretion

Sentinel generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Sentinel. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Sentinel will be in accordance with each Client's investment objectives and goals. The Board of Trustees of the Fund approves discretionary authority for the Fund annually.

Item 17 – Voting Client Securities

The Advisor will vote proxies on behalf of the Fund based on the proxy voting guidelines approved by the Board and will report the voting record of the Fund to the Board and file the voting record with the SEC. Sentinel does not vote proxies for individual managed accounts or for Sub-advisory Services. The responsibility for voting these proxies is borne by the Client. The Advisor will provide assistance with questions relating to proxies.

Item 18 – Financial Information

Neither Sentinel, nor its management, has any adverse financial situations that would reasonably impair the ability of Sentinel to meet all obligations to its Clients. Neither Sentinel, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Sentinel is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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Form ADV Part 2B – Brochure Supplement

for

Cort F. Meinelschmidt
President and Co-CIO

Effective: May 29, 2015

This Brochure Supplement provides information about the background and qualifications of Cort F. Meinelschmidt (CRD# **4757304**) in addition to the information contained in the Sentinel Capital Solutions, Inc. ("Sentinel" or the "Advisor") (CRD # 157844) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Sentinel Disclosure Brochure or this Brochure Supplement, please contact us at (301) 665-9038 or by email at info@sentinelcapitalsolutions.com.

Additional information about Mr. Meinelschmidt is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Cort Meinelschmidt is the President and Co-Chief Investment Officer of Sentinel. Cort Meinelschmidt, born in 1979, is dedicated to advising Clients of Sentinel.

Mr. Meinelschmidt earned a BS in Business Administration from Thomas Edison State College in 2005.

Additional information regarding Mr. Meinelschmidt's employment history is included below.

Employment History:

President and Co-Chief Investment Officer, Sentinel Capital Solutions, Inc.	06/2011 to Present
Registered Representative, Capital Investment Group	04/2012 to Present
Registered Representative, WFG Investments, Inc.,	07/2011 to 02/2012
Investment Advisor Representative and Registered Representative, LPL Financial	05/2010 to 07/2011
Financial Advisor, Centra Bank	05/2010 to 07/2011
Financial Advisor, Edward Jones	02/2004 to 05/2010
Aviation Rescue Swimmer, United States Navy	08/1997 to 02/2004

Professional Designation: Accredited Asset Management Specialist

A professional designation awarded by the College of Financial Planning. Requires self-study, passing an exam and agreeing to comply with a Code of Ethics. Applicants study case studies based on real-life scenarios designed to prepare them to be effective in the real world and build lasting relationships with clients.

The program covers the asset management process; investors, policy and change; risk, return and investment performance; asset allocation and selection; investment strategies; taxation of investment products; investment opportunities for individual retirement; investment considerations for small business owners; executive compensation and benefit plans; insurance products for investment clients; estate planning; and regulatory and ethical issues.

Individuals are required to complete continuing education to maintain the designation.

Item 3 – Disciplinary Information

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

Mr. Meinelschmidt, was involved in two customer disputes, one which was denied, and the other which was settled out of court.

You may also to independently view the background of Mr. Meinelschmidt on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **4757304** in the field labeled "Individual Name or CRD#"

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Meinelschmidt is also a registered representative of Capital Investment Group (herein "CIG") of Raleigh, North Carolina. CIG is a registered broker-dealer (CRD No. 14752), member FINRA, SIPC. In his separate

capacity as a registered representative, Mr. Meinelschmidt will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Meinelschmidt. Neither the Advisor nor Mr. Meinelschmidt will earn investment advisory fees in connection with any services implemented in Mr. Meinelschmidt's separate capacity as a registered representative where commissions are earned.

Insurance Agency Affiliations

Mr. Meinelschmidt, President and Co-Chief Investment Officer of Sentinel, may serve as an insurance professional for various insurance companies. This activity is done separate and apart from his role with Sentinel. As an insurance professional, Mr. Meinelschmidt may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Meinelschmidt or the Advisor.

Item 5 – Additional Compensation

Mr. Meinelschmidt may receive additional compensation from business activities that are detailed in "Item 4 - Other Business Activities" above.

Item 6 – Supervision

Mr. Meinelschmidt serves as the President and Co-Chief Investment Officer of Sentinel and is supervised by Chelsea Miller, the Chief Compliance Officer. Chelsea Miller can be reached at (301) 665-9038.

Sentinel has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Sentinel. Further, Sentinel is subject to regulatory oversight by various agencies. These agencies require registration by Sentinel and its employees. As a registered entity, Sentinel is subject to examinations by regulators, which may be announced or unannounced. Sentinel is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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Form ADV Part 2B – Brochure Supplement
for

Charles A. Knott
Co-CIO and Portfolio Manager

Effective: May 29, 2015

This Brochure Supplement provides information about the background and qualifications of Charles A. Knott (CRD# **716811**) in addition to the information contained in the Sentinel Capital Solutions, Inc. ("Sentinel" or the "Advisor") (CRD # 157844) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Sentinel Disclosure Brochure or this Brochure Supplement, please contact us at (301) 665-9038 or by email at info@sentinelcapitalsolutions.com.

Additional information about Mr. Knott is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

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Item 2 – Educational Background and Business Experience

Charles Knott is the Co-Chief Investment Officer and Portfolio Manager of Sentinel. Charles Knott, born in 1941, is dedicated to advising Clients of Sentinel. Mr. Knott earned a BS in Accounting from Loyola College.

Additional information regarding Mr. Knott's employment history is included below.

Employment History:

Co-Chief Investment Officer and Portfolio Manager, Sentinel Capital Solutions, Inc.	06/2013 to Present
Co-Chief Investment Officer, Knott Asset Management	2011 to 05/2013
Chairman, President and CIO, Knott Capital	1998 to 2011
President, CEO, and CIO, Logan Capital Management	1993 to 1998
President, CIO, and Chief Strategist, Mercer Capital Management	1992 to 1993

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Knott. Mr. Knott has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Knott. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Knott.*** However, we do encourage you to independently view the background of Mr. Knott on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **716811** in the field labeled "Individual Name or CRD#".

Item 4 – Other Business Activities

Mr. Knott is dedicated to the investment advisory activities of Sentinel's Clients. Mr. Knott does not have any other business activities.

Item 5 – Additional Compensation

Mr. Knott is dedicated to the investment advisory activities of Sentinel's Clients. Mr. Knott does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Knott serves as the Co-CIO and Portfolio Manager of Sentinel and is supervised by Chelsea Miller, the Chief Compliance Officer. Chelsea Miller can be reached at (301) 665-9038.

Sentinel has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Sentinel. Further, Sentinel is subject to regulatory oversight by various agencies. These agencies require registration by Sentinel and its employees. As a registered entity, Sentinel is subject to examinations by regulators, which may be announced or unannounced. Sentinel is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement
for

Jullie A. Caniford
Financial Advisor

Effective: May 29, 2015

This Brochure Supplement provides information about the background and qualifications of Jullie A. Caniford (CRD# **6116319**) in addition to the information contained in the Sentinel Capital Solutions, Inc. ("Sentinel" or the "Advisor") (CRD # 157844) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Sentinel Disclosure Brochure or this Brochure Supplement, please contact us at (301) 665-9038 or by email at info@sentinelcapitalsolutions.com.

Additional information about Ms. Caniford is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

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Item 2 – Educational Background and Business Experience

Jullie Caniford is a Financial Advisor of Sentinel. Jullie Caniford, born in 1970, is dedicated to advising Clients of Sentinel. Ms. Caniford earned a BS in Accounting from Shepherd University in 1993.

Additional information regarding Ms. Caniford's employment history is included below.

Employment History:

Financial Advisor, Sentinel Capital Solutions, Inc.	11/2013 to Present
Registered Representative, Capital Investment Group	03/2014 to Present
Wealth Manager, Cushwa Wealth Managers	09/2012 to 11/2013
Senior Manager, Gorfine Schiller Gardyn PA	12/2009 to 08/2012

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Caniford. Ms. Caniford has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Caniford. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Caniford.***

However, we do encourage you to independently view the background of Ms. Caniford on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter **6116319** in the field labeled "Individual Name or CRD#".

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Ms. Caniford is also a registered representative of Capital Investment Group (herein "CIG") of Raleigh, North Carolina. CIG is a registered broker-dealer (CRD No. 14752), member FINRA, SIPC. In her separate capacity as a registered representative, Ms. Caniford will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Caniford. Neither the Advisor nor Ms. Caniford will earn investment advisory fees in connection with any services implemented in Ms. Caniford's separate capacity as a registered representative where commissions are earned.

Insurance Agency Affiliations

Ms. Caniford, Financial Advisor of Sentinel, may serve as an insurance professional for various insurance companies. This activity is done separate and apart from her role with Sentinel. As an insurance professional, Ms. Caniford may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Caniford or the Advisor.

Accounting Services

Ms. Caniford also operates outside of Sentinel as a CPA. Tax planning and preparation services may be rendered to individuals or institutions that are also Clients of the Advisor. Clients are made aware that any CPA services are provided outside of their relationship with Sentinel, and that any fees charged will be billed and collected by Ms. Caniford in her separate capacity as a CPA. This may cause a conflict of interest in

recommending accounting services to Clients of the Advisor. Clients are under no obligation to implement any recommendations made by Ms. Caniford or the Advisor.

Item 5 – Additional Compensation

Ms. Caniford may receive additional compensation from business activities that are detailed in “Item 4 - Other Business Activities” above.

Item 6 – Supervision

Ms. Caniford serves as the Financial Advisor of Sentinel and is supervised by Chelsea Miller, the Chief Compliance Officer. Chelsea Miller can be reached at (301) 665-9038.

Sentinel has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Sentinel. Further, Sentinel is subject to regulatory oversight by various agencies. These agencies require registration by Sentinel and its employees. As a registered entity, Sentinel is subject to examinations by regulators, which may be announced or unannounced. Sentinel is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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Sentinel Capital Solutions, Inc.

Privacy Policy

Effective: May 29, 2015

Privacy Policy

Our Commitment to You

Sentinel Capital Solutions, Inc. ("Sentinel" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Sentinel (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Sentinel does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered investment advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

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Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Sentinel does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Sentinel or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients Sentinel does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (301) 665-9038.