



LiveLife Capital Partners LLC

Form ADV Part 2A – Disclosure Brochure

Effective: April 9, 2019

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of LiveLife Capital Partners LLC (“LiveLife Capital” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (978) 315-0230 or at info@livelifecapital.com.

LiveLife Capital is a registered investment advisor located in the Commonwealth of Massachusetts. 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 about LiveLife Capital to assist you in determining whether to retain the Advisor.

Additional information about LiveLife Capital and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 290008.

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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 Persons of LiveLife Capital. For convenience, we have combined these documents into a single disclosure document.

LiveLife Capital 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. LiveLife Capital 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

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms. Please see Item 4 and 5.
- The Advisor has updated its disclosures as it related to LiveLife Capital Ventures, LLC. Please see Item 10.
- The Advisor has enhanced its share class selection process. Please see Item 4 and Item 5.

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.

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 by searching with our firm name or our CRD# 290008. You may also request a copy of this Disclosure Brochure at any time by contacting us at (978) 315-0230.

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Item 4 – Advisory Services

A. Firm Information

LiveLife Capital Partners LLC (“LiveLife Capital” or the “Advisor”) is a registered investment advisor with the SEC, which is organized as a Limited Liability Company (“LLC”) under the laws of the State of Delaware. LiveLife Capital was founded in August 2017, and is owned and operated by Shawn Mauro (Managing Partner). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by LiveLife Capital.

B. Advisory Services Offered

LiveLife Capital offers investment advisory services to individuals, high net worth individuals, trusts and estates (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

LiveLife Capital provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. LiveLife Capital works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. LiveLife Capital will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds or options contracts to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

LiveLife Capital selects, recommends and/or retains mutual funds on a fund by fund basis and seeks to use non-retail or institutional classes when possible. Due to specific custodial or mutual fund company constraints, and/or material tax consideration, LiveLife Capital may select, recommend and/or retain a mutual fund share class that has a higher expense ratio than an equivalent share class. LiveLife Capital will seek to select the lowest cost share class available that is in the best interest of each Client and will ensure the selection aligns with the Client’s financial objectives and state investment guidelines.

LiveLife Capital’s investment strategies are 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. LiveLife Capital 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 acceptance by the Advisor.

LiveLife Capital evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. LiveLife Capital may recommend, on occasion, redistributing investment allocations to diversify the portfolio. LiveLife Capital 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. LiveLife Capital 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 the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

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At no time will LiveLife Capital accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 - Custody.. All Client assets will be managed within their designated account[s], pursuant to the Client advisory agreement. Please see Item 12 – Brokerage Practices.

Use of Independent Managers

LiveLife Capital may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client's investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests. The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

Family Office Advisory Services

For certain Clients, the Advisor offers an expanded service suite of family office-style advisory services. Generally, these services are available to individuals, families, trusts, closely held corporations and other businesses. These services may include the discretionary management of investment portfolios and all financial planning services as well as advice on intergenerational wealth transfer strategies, family meeting facilitation and education, philanthropic planning, review of private investment opportunities and detailed cash flow planning and management. Additionally, LiveLife Capital coordinate with various experts such as an accountant, attorney or other specialists to advise Clients on their financial situation, including tax, retirement and estate planning goals. All decisions to work with other professionals are made at the sole discretion of the Client. Upon request, LiveLife Capital may suggest the Client talk with other professionals, but the Client is under no obligation to do so, or act upon any suggestion.

Retirement Plan Advisory Services

LiveLife Capital provides non-discretionary retirement plan advisory services on behalf of the retirement plans (each a “Plan”) and the company (the “Plan Sponsor”). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement (“IPS”) Design and Monitoring
- Investment Management
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Certain of these services are provided by LiveLife Capital serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of LiveLife Capital's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

C. Client Account Management

Prior to engaging LiveLife Capital to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

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- Establishing an Investment Strategy – LiveLife Capital, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – LiveLife Capital will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – LiveLife Capital will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – LiveLife Capital will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

LiveLife Capital includes securities transaction fees together with its investment advisory fees. Including these fees into a single asset-based fee is considered a "Wrap Fee Program". The Advisor customizes its investment management services for its Clients. The Advisor sponsors the LiveLife Capital Wrap Fee Program Brochure solely as a supplemental disclosure regarding the combination of fees. The Advisor also serves as the Sponsor in conjunction with Independent Managers for the Wrap Fee Program, placed under the platform. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

E. Assets Under Management

As of March 31, 2019 the Advisor manages approximately \$160,871,000 in Client assets, all of which are on a discretionary basis. 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 engaging the Advisor for services described herein shall be required to enter into one or more written agreements with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior quarter. Investment advisory fees range from 0.25% to 2.00% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by LiveLife Capital will be independently valued by the Custodian. LiveLife Capital will not have the authority or responsibility to value portfolio securities.

If the Client participates in the Advisor's wrap fee program, then brokerage fees, transaction fees, and other related costs and expenses would be paid for by the Advisor.

Use of Independent Managers

For Client account[s] implemented through an Independent Manager, the Client's overall fees may include the Advisor's investment advisory fee (as noted above) plus advisory fees and/or platform fees charged by the Independent Manager[s], as applicable. The Independent Manager may assume responsibility for calculating the

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Client's fees and deduct all fees from the Client's account[s]. In such instances, the Advisor will not charge its fee separately on those assets.

Family Office Advisory Services

The Advisor offers family office advisory services for a fixed engagement fee ranging up to \$50,000 annually billed quarterly in advance. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total costs will be determined prior to establishing the advisory relationship.

Retirement Plan Advisory Services

Retirement plan advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the retirement plan advisory agreement. Retirement plan advisory fees range from 0.25% to 2.00% of Plan assets or based on a fixed negotiated fee. Fees are based on the market value of assets in the Plan on the last day of the quarter. Fees are negotiable based on the size and complexity of the services provided to the Plan.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with LiveLife Capital at the end of the prior quarter. 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 advisory fees to be deducted by LiveLife Capital directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers

Client account[s] implemented through Independent Manager[s] will be billed in accordance to the separate agreement[s] with the respective parties. These parties will typically add the Advisor's investment advisory fee and deduct the overall fee from the Client's account[s].

Family Office Advisory Services

Fees for family office advisory services are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by dividing the annual fixed engagement fee by 4. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the 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 LiveLife Capital to be paid directly from their account[s] held by the Custodian as part of the advisory agreement and separate account forms provided by the Custodian.

Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. LiveLife Capital includes securities transactions costs as part of its overall investment advisory fee through the LiveLife Capital Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

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In addition, all fees paid to LiveLife Capital for investment advisory services or part of the LiveLife Capital Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. As mentioned in Item 4.B above, the Client may be invested into share classes of a mutual fund that have a higher expense ratio than a different share class, including but not limited to 12B-1 fees. This may result in Clients paying higher expense ratio[s]. 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. For a complete discussion of expenses related to each mutual fund, please read a copy of the prospectus issued by that particular fund. A Client may be able to invest in these products directly, without the services of LiveLife Capital, but would not receive the services provided by LiveLife Capital which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by LiveLife Capital to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

LiveLife Capital is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. LiveLife Capital will assist the Client with the termination and transition as appropriate.

Family Office Advisory Services

LiveLife Capital is compensated for its services in advance of the quarter in which family office advisory services are rendered. Either party may terminate the family office advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the family office advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid advisory fees from the effective date of termination to the end of the quarter. The Client's family office advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Retirement Plan Advisory Services

LiveLife Capital is compensated for its retirement plan advisory services in advance of the quarter in which services are rendered. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the retirement plan advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

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LiveLife Capital does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Certain Advisory Persons are also registered representatives of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD No. 35747), member FINRA, SIPC. In one's separate capacity as a registered representative of PKS, the Advisory Person may implement securities transactions under PKS and not through LiveLife Capital. In such instances, the Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by the Advisory Person in one's capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because the Advisory Person who is a registered representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any products or services implemented in the Advisory Person's separate capacity as a registered representative. Please see Item 10 – Other Financial Industry Activities and Affiliations.

Mr. Mauro is also licensed as an independent insurance professional. As an independent insurance professional, Mr. Mauro may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by Mr. Mauro are separate and in addition to LiveLife Capital's advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Mauro.

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

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

LiveLife Capital does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

LiveLife Capital offers investment advisory services to individuals, high net worth individuals, trusts and estates. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. LiveLife Capital generally does not impose a minimum account size for establishing a relationship.

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

A. Methods of Analysis

LiveLife Capital employs a fundamental, technical, cyclical and charting analysis methods in developing investment strategies for its Clients. Research and analysis from LiveLife Capital 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.

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

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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 involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that LiveLife Capital will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that LiveLife Capital is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. 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 technical and charting analysis may lose value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

As noted above, LiveLife Capital generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. LiveLife Capital 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, LiveLife Capital 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. LiveLife Capital 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.

While the methods of analysis help 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 these methods of 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.

Each Client engagement 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[s]. 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

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construction process. The following are some of the risks associated with certain components of the Advisor's strategies:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Bond ETFs

Bond ETFs are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

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

There are no legal, regulatory or disciplinary events involving LiveLife Capital or any of its Supervised Persons. LiveLife Capital values 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 available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 290008.

In addition, Clients may also obtain information relating to the disciplinary history of any investment advisor representative conducting business in Massachusetts by contacting the Commonwealth of Massachusetts Securities Division at (617) 727-3548.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

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As noted in Item 5.E., certain Advisory Persons are also registered representatives of PKS. In one's separate capacity as a registered representative of PKS, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by the Advisory Person. Neither the Advisor nor Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative.

Insurance Agency Affiliations

As noted in Item 5.E., Mr. Mauro is also licensed as an insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Mauro's role with LiveLife Capital. As an insurance professional, Mr. Mauro may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Mauro is not required to offer the products of any particular insurance company. 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 Persons or Mr. Mauro.

LiveLife Capital Ventures

LiveLife Capital Ventures, LLC ("LiveLife Capital Ventures") is an affiliated company under common control with the Advisor. LiveLife Capital Ventures is an entity established for purposes of passively investing into private start-up companies. LiveLife Capital Ventures may invest into certain start-up companies which may be owned by Clients of the Advisor. Investments into start-up companies will not be contingent upon the utilization of the Advisor's services. Additionally, Client's will not be solicited to invest directly in LiveLife Capital Ventures or in the underlying start-up companies.

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

A. Code of Ethics

LiveLife Capital has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with LiveLife Capital (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. LiveLife Capital and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of LiveLife Capital's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (978) 315-0230.

B. Personal Trading with Material Interest

LiveLife Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. LiveLife Capital does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. LiveLife Capital does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

LiveLife Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons 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 LiveLife Capital requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

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D. Personal Trading at Same Time as Client

While LiveLife Capital allows our Supervised Persons 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 LiveLife Capital, or any Supervised Person of LiveLife Capital, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

LiveLife Capital does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize LiveLife Capital to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, LiveLife Capital does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where LiveLife Capital does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by LiveLife Capital. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. LiveLife Capital may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices. LiveLife Capital will generally recommend that Clients establish their account[s] at either Charles Schwab & Co., Inc. ("Schwab") or Fidelity Clearing & Custody Solutions, a division of Fidelity Investments, Inc. (collectively "Fidelity"), a FINRA-registered broker-dealer and member SIPC. Schwab and Fidelity will serve as the Client's "qualified custodian". LiveLife Capital maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - The Advisor has an arrangement with Fidelity through which they provides the LiveLife with Fidelity's "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like the Advisor in conducting business and in serving the best interests of their clients but that may benefit the Advisor. Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables the Advisor to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

As part of the arrangement, Fidelity also makes available to the Advisor, at no additional charge to the Advisor, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by the Advisor (within specified parameters). These research and brokerage services presently include services that are used by the Advisor to manage accounts for which the Advisor has investment discretion. Without this arrangement, the Advisor might be compelled to purchase the same or similar services at its own expense.

As a result of receiving such services for no additional cost, the Advisor may have an incentive to continue to use or expand the use of Fidelity's services. LiveLife examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of the Advisor's clients and satisfies its client obligations, including its duty to seek best execution. A client may pay a

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commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Advisor determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although the Advisor will seek competitive rates, to the benefit of all clients, it may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by the Advisor will generally be used to service all of the Advisor's clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. The Advisor and Fidelity are not affiliates, and no broker-dealer affiliated with the Advisor is involved in the relationship between LiveLife and Fidelity.

2. Brokerage Referrals - LiveLife Capital does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where LiveLife Capital will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective 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]). LiveLife Capital 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 Custodian.

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 Custodian. LiveLife Capital will execute its transactions through the Custodian as authorized by the Client. LiveLife Capital may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. 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 any particular Client accounts. If the Client chooses a Custodian that LiveLife Capital does not have an institutional relationship with, then LiveLife Capital will not be able to block trades for that Client's account.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Shawn Mauro, Chief Compliance Officer of LiveLife Capital. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

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 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[s]. The Client is encouraged to notify LiveLife Capital 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

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to

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the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by LiveLife Capital

Participation in Institutional Advisor Platform

LiveLife Capital has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like LiveLife Capital. As a registered investment advisor participating on the Schwab Advisor Services platform, LiveLife Capital receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services to LiveLife Capital that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. LiveLife Capital believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Participation in Institutional Advisor Platform

LiveLife has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

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B. Client Referrals from Solicitors

LiveLife Capital does not engage paid solicitors for Client referrals.

Item 15 – Custody

LiveLife Capital does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct LiveLife Capital to utilize a Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by LiveLife Capital to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

LiveLife Capital 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 LiveLife Capital. 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 LiveLife Capital will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

LiveLife Capital does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither LiveLife Capital, nor its management have any adverse financial situations that would reasonably impair the ability of LiveLife Capital to meet all obligations to its Clients. Neither LiveLife Capital, nor any of its Advisory Person, have been subject to a bankruptcy or financial compromise. LiveLife Capital 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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LiveLife Capital Partners LLC

Form ADV Part 2A – Appendix 1 ("Wrap Fee Program Brochure")

Effective: April 9, 2019

This Form ADV2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices for LiveLife Capital Partners LLC ("LiveLife Capital" or the "Advisor") services when offering services pursuant to a wrap program. This Wrap Fee Program Brochure shall always be accompanied by the LiveLife Capital Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete LiveLife Capital Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the LiveLife Capital Disclosure Brochure, please contact us at (978) 315-0230 or at info@livelifecapital.com.

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

Additional information about LiveLife Capital and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 290008.

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Item 2 – Material Changes

Form ADV 2 - Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses wrap fee programs offering by the Advisor.

Material Changes

- The Advisor may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms. Please see Item 4 and 5.
- The Advisor has updated its disclosures as it related to LiveLife Capital Ventures, LLC. Please see Item 10.
- The Advisor has enhanced its share class selection process. Please see Item 4 and Item 5.

Future Changes

From time to time, we may amend this Wrap Fee Program Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure (along with the complete LiveLife Capital 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 LiveLife Capital.

At any time, you may view this Wrap Fee Program Brochure and the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 290008. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (978) 315-0230.

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Item 4 – Services Fees and Compensation

A. Services

LiveLife Capital Partners LLC (“LiveLife Capital” or the “Advisor”) provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the LiveLife Capital Form ADV 2A (“Disclosure Brochure”). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting LiveLife Capital as your investment advisor.

As part of the investment advisory fees noted in Item 5 – Fees and Compensation of the Disclosure Brochure, LiveLife Capital includes normal securities transaction fees as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”. The Advisor sponsors the LiveLife Capital Wrap Fee Program.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees into the single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the LiveLife Capital Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on LiveLife Capital’s investment philosophy and related services.**

B. Program Costs

Advisory services provided by LiveLife Capital are offered in a Wrap Fee Program structure whereby normal securities transaction costs are included in the overall investment advisory fee paid to LiveLife Capital. As the level of trading in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity in the Client’s account[s]. A Wrap Fee Program structure has a potential conflict of interest as the Advisor may have an incentive to limit the number of trades placed in the Client’s account[s]. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

C. Fees

Investment advisory fees are paid quarterly, in advance, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range from 2.00% to 0.25% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by LiveLife Capital will be independently valued by the Custodian. LiveLife Capital will not have the authority or responsibility to value portfolio securities.

As noted above, the Wrap Fee Program Brochure includes normal securities trading costs incurred in connection with the discretionary investment management services provided by LiveLife Capital. Securities transaction fees for Client-directed trades may be charged back to the Client.

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client’s account[s]. Under this Wrap Fee Program Brochure, LiveLife Capital includes securities transactions costs as part of its overall investment advisory fee.

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In addition, all fees paid to LiveLife Capital for investment advisory services or part of the Wrap Fee Program Brochure are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. As mentioned in Item 4.B – Advisory Services of the Disclosure Brochure, Clients may be invested into share classes of a mutual fund that have a higher expense ratio than a different share class, including but not limited to 12B-1 fees. 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. These fees and expenses are described in each fund's prospectus.

The Client may also incur other costs assessed by the Custodian or other parties for account related activity fees, such as wire transfer fees, fees for trades executed away from the Custodian and other fees. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by LiveLife Capital to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

D. Compensation

LiveLife Capital is the sponsor and portfolio manager of this Wrap Fee Program Brochure. LiveLife Capital receives investment advisory fees paid by Clients for participating in the Wrap Fee Program Brochure and pays the Custodian for the costs associated with the normal trading activity in the Client's account[s].

Item 5 – Account Requirements and Types of Clients

LiveLife Capital offers investment advisory services to individuals, high net worth individuals, trusts and estates. LiveLife Capital generally does not impose a minimum account size for establishing a relationship. Please see Item 7 – Types of Clients of the Disclosure Brochure for additional information.

Item 6 – Portfolio Manager Selection and Evaluation

Portfolio Manager Selection

LiveLife Capital serves as sponsor and as portfolio manager for the services under this Wrap Fee Program Brochure. LiveLife Capital also serves as the sponsor in conjunction with Independent Managers for the Wrap Fee Program.

LiveLife Capital may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Managers to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

Related Persons

LiveLife Capital personnel serve as portfolio managers for this Wrap Fee Program Brochure. LiveLife Capital does not serve as a portfolio manager for any third-party wrap fee programs.

Performance-Based Fees

LiveLife Capital does not charge performance-based fees.

Supervised Persons

LiveLife Capital Advisory Persons serve as portfolio managers for certain accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4 – Advisory Services of the Disclosure Brochure.

Methods of Analysis

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Please see Item 8.A – Methods of Analysis of the Disclosure Brochure for details on the research and analysis methods employed by the Advisor.

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. LiveLife Capital 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.

Each Client engagement 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[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. 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.

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. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.

Proxy Voting

LiveLife Capital does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 7 – Client Information Provided to Portfolio Managers

LiveLife Capital is the sponsor and portfolio manager for the Program. The Advisor may share Client information with other portfolio managers to help the Independent Manager's assist in managing the Client's assets. Please also see the LiveLife Capital Privacy Policy (included after this Wrap Fee Program Brochure).

Item 8 – Client Contact with Portfolio Managers

LiveLife Capital is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at LiveLife Capital.

Item 9 – Additional Information

A. Disciplinary Information and Other Financial Industry Activities and Affiliations

LiveLife Capital values 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 available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 290008. Please see Item 9 – Disciplinary Information of the LiveLife Capital Disclosure Brochure as well as Item 3 – Disciplinary Information of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

Other Financial Activities and Affiliations

Please see Item 10 – Other Financial Industry Activities and Affiliations and Item 14 – Client Referrals and Other Compensation of the Disclosure Brochure.

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B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information

LiveLife Capital has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to LiveLife Capital's compliance program (our "Supervised Persons"). Complete details on the LiveLife Capital Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading of the Disclosure Brochure.

Review of Accounts

Investments in Client accounts are monitored on a regular and continuous basis by Advisory Persons of LiveLife Capital under the supervision of the Chief Compliance Officer ("CCO"). Details of the review policies and practices are provided in Item 13 – Review of Accounts of the Disclosure Brochure.

Other Compensation

Participation in Institutional Advisor Platform

LiveLife Capital has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like LiveLife Capital. As a registered investment advisor participating on the Schwab Advisor Services platform, LiveLife Capital receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services to LiveLife Capital that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. LiveLife Capital believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Participation in Institutional Advisor Platform

LiveLife has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

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Additionally, the Advisor may receive the following benefits from Fidelity: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Please see Item 14 – Other Compensation of the Disclosure Brochure for details on additional compensation that may be received by LiveLife Capital or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

Client Referrals from Solicitors

LiveLife Capital does not engage paid solicitors for Client referrals.

Financial Information

Neither LiveLife Capital, nor its management have any adverse financial situations that would reasonably impair the ability of LiveLife Capital to meet all obligations to its Clients. Neither LiveLife Capital, nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. LiveLife Capital is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance. Please see Item 18 – Financial Information of the Disclosure Brochure.

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Form ADV Part 2B – Brochure Supplement

for

**Shawn Mauro, CLTC, CRPC®
Managing Partner and Chief Compliance Officer**

Effective: April 9, 2019

This Form ADV 2B, CLTC, CRPC® (“Brochure Supplement”) provides information about the background and qualifications of Shawn Mauro (CRD# 5299965) in addition to the information contained in the LiveLife Capital Partners LLC (“LiveLife Capital” or the “Advisor”, CRD# 290008) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the LiveLife Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 315-0230 or or at info@livelifecapital.com.

Additional information about Mr. Mauro is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5299965.

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Item 2 – Educational Background and Business Experience

Shawn Mauro, CLTC, CRPC®, born in 1984, is dedicated to advising Clients of LiveLife Capital as the Managing Partner and Chief Compliance Officer. Mr. Mauro earned a Bachelors Degree from the University of Massachusetts - Amherst in 2006. Additional information regarding Mr. Mauro's employment history is included below.

Employment History:

Managing Partner and Chief Compliance Officer, LiveLife Capital Partners LLC	08/2017 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	10/2017 to 01/2019
Vice President, Morgan Stanley Smith Barney	08/2008 to 10/2017
Client Associate, Merrill Lynch, Pierce, Fenner & Smith Incorporated	01/2007 to 08/2008

Certification in Long-Term Care ("CLTC")

The CLTC (Certification in Long-Term Care) program was created in 1999. It focuses on the discipline of extended care planning. It provides professionals the critical tools necessary to discuss the subject of longevity and its consequences on their client's family and finances. Students learn how to mitigate these consequences by developing a plan to protect their clients and their families.

The designation has been recognized and supported by The American College, CFP Board, NAIFA, NAHU and major insurance carriers. Designees renew their designation every two-years by completing the CLTC renewal course or state mandated long-term care training.

Chartered Retirement Planning Counselor ("CRPC®")

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Mauro. Mr. Mauro 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. Mauro.

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. Mauro.***

However, we do encourage you to independently view the background of Mr. Mauro on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5299965.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Mauro is also a licensed insurance professional through Holistic Insurance Partners. Implementations of insurance recommendations are separate and apart from Mr. Mauro's role with LiveLife Capital. As an insurance

professional, Mr. Mauro may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Mauro is not required to offer the products of any particular insurance company. 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. Mauro or the Advisor.

LiveLife Capital Ventures

Mr. Mauro in his separate capacity is a Partner of LiveLife Capital Ventures, LLC ("LiveLife Capital Ventures") an affiliated company under common control with the Advisor. LiveLife Capital Ventures is an entity established for purposes of passively investing into private start-up companies. LiveLife Capital Ventures may invest into certain start-up companies which may be owned by Clients of the Advisor. Investments into start-up companies will not be contingent upon the utilization of the Advisor's services. Additionally, Client's will not be solicited to invest directly in LiveLife Capital Ventures or in the underlying start-up companies. Mr. Mauro spends approximately 1% of his time per month with LiveLife Capital Ventures.

Main Street Bank

Mr. Mauro has been elected as a Corporator for Main Street Bank. In his role as a Corporator, Mr. Mauro sits on the board where he attends 2 meetings a year, and assists in the approval of major changes to the charter and corporate structure.

Item 5 – Additional Compensation

Mr. Mauro has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Mauro serves as the Managing Partner and the Chief Compliance Officer of LiveLife Capital. Mr. Mauro can be reached at (978) 315-0230.

LiveLife Capital has implemented a Code of Ethics, an internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of LiveLife Capital. Further, LiveLife Capital is subject to regulatory oversight by various agencies. These agencies require registration by LiveLife Capital and its Supervised Persons. As a registered entity, LiveLife Capital is subject to examinations by regulators, which may be announced or unannounced. LiveLife Capital 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

Christopher R. Fisher, CFA
Managing Partner and Chief Investment Officer

Effective: April 9, 2019

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Christopher R. Fisher (CRD# 5258945) in addition to the information contained in the LiveLife Capital Partners LLC ("LiveLife Capital" or the "Advisor", CRD# 290008) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the LiveLife Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 315-0232 or at info@livelifecapital.com.

Additional information about Mr. Fisher is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5258945.

Item 2 – Educational Background and Business Experience

Christopher R. Fisher, born in 1984, is dedicated to advising Clients of LiveLife Capital as a Managing Partner and Chief Investment Officer. Mr. Fisher earned a Master of Science in Investment Management from Boston University - Questrom School of Business in 2013. Mr. Fisher also earned a Bachelor of Arts in East Asian Studies from Colgate University in 2006. Additional information regarding Mr. Fisher's employment history is included below.

Employment History:

Managing Partner and Chief Investment Officer, LiveLife Capital Partners LLC	10/2017 to Present
Associate, Bigelow Capital Securities	01/2016 to 05/2017
Senior Investment Analyst, Fidelity Investments	07/2014 to 12/2016
Analyst, Brown Brothers Harriman & Co.	11/2006 to 06/2014

Chartered Financial Analyst ("CFA®")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA® Institute. To earn the CFA® charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA® Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA® charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA® Institute Code of Ethics and Standards of Professional Conduct. CFA® is a trademark owned by CFA® Institute.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Fisher. Mr. Fisher 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. Fisher.

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. Fisher.***

However, we do encourage you to independently view the background of Mr. Fisher on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5258945.

Item 4 – Other Business Activities

LiveLife Capital Ventures

Mr. Fisher in his separate capacity is a Partner of LiveLife Capital Ventures, LLC ("LiveLife Capital Ventures") an affiliated company under common control with the Advisor. LiveLife Capital Ventures is an entity established for purposes of passively investing into private start-up companies. LiveLife Capital Ventures may invest into certain start-up companies which may be owned by Clients of the Advisor. Investments into start-up companies will not be contingent upon the utilization of the Advisor's services. Additionally, Client's will not be solicited to invest directly in LiveLife Capital Ventures or in the underlying start-up companies. Mr. Fisher spends approximately 1% of his time per month with LiveLife Capital Ventures.

Item 5 – Additional Compensation

Mr. Fisher has additional business activities where compensation is received that are detailed in Item 4 above.

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Item 6 – Supervision

Mr. Fisher serves as a Managing Partner and Chief Investment Officer of LiveLife Capital and is supervised by Shawn Mauro, the Chief Compliance Officer. Mr. Mauro can be reached at (978) 315-0232.

LiveLife Capital has implemented a Code of Ethics, an internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of LiveLife Capital. Further, LiveLife Capital is subject to regulatory oversight by various agencies. These agencies require registration by LiveLife Capital and its Supervised Persons. As a registered entity, LiveLife Capital is subject to examinations by regulators, which may be announced or unannounced. LiveLife Capital 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

**Susan R. Fechter
Director of Client Relations**

Effective: April 9, 2019

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Susan R. Fechter (CRD# 4098244) in addition to the information contained in the LiveLife Capital Partners LLC (“LiveLife Capital” or the “Advisor”, CRD# 290008) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the LiveLife Capital Disclosure Brochure or this Brochure Supplement, please contact us at (978) 315-0230 or at info@livelifecapital.com.

Additional information about Ms. Fechter is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4098244.

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Item 2 – Educational Background and Business Experience

Susan R. Fechter, born in 1972, is dedicated to advising Clients of LiveLife Capital as the Director of Client Relations. Ms. Fechter has no post high school education. Additional information regarding Ms. Fechter's employment history is included below.

Employment History:

Director of Client Relations, LiveLife Capital Partners LLC	10/2017 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	01/2019 to Present
Financial Advisor, Morgan Stanley Smith Barney	08/2008 to 10/2017
Client Associate, Merrill Lynch, Pierce, Fenner & Smith Incorporated	04/1997 to 08/2008

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Fechter. Ms. Fechter 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. Fechter.

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. Fechter.***

However, we do encourage you to independently view the background of Ms. Fechter on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4098244.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Ms. Fechter is also a registered representative of Purshe Kaplan Sterling Investments, Inc. ("PKS"). PKS is a registered broker-dealer (CRD# 35747), member FINRA, SIPC. In Ms. Fechter's separate capacity as a registered representative, Ms. Fechter will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Fechter. Neither the Advisor nor Ms. Fechter will earn ongoing investment advisory fees in connection with any products or services implemented in Ms. Fechter's separate capacity as a registered representative.

Item 5 – Additional Compensation

Ms. Fechter has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Fechter serves as the Director of Client Relations of LiveLife Capital and is supervised by Shawn Mauro, the Chief Compliance Officer. Mr. Mauro can be reached at (978) 315-0230.

LiveLife Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of LiveLife Capital. Further, LiveLife Capital is subject to regulatory oversight by various agencies. These agencies require registration by LiveLife Capital and its Supervised Persons. As a registered entity, LiveLife Capital is subject to examinations by regulators, which may be announced or unannounced. LiveLife Capital 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.

Privacy Policy

Effective: April 9, 2019

Our Commitment to You

LiveLife Capital Partners ("LiveLife Capital" 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. LiveLife Capital (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.

LiveLife Capital 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?

Driver's license number	Date of birth
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.

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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.

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 LiveLife Capital 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 LiveLife Capital 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 LiveLife Capital 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

State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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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 (978) 315-0230 or at info@livelifecapital.com.

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