

FLOW FOCUS LLC (DBA The Atlas Financial Group)

FORM CRS

This form provides a summary of the business practices and services provided by FLOW FOCUS LLC (DBA The Atlas Financial Group) ("AFG"). Should you have any questions about the contents of this form please do not hesitate to contact us at (786) 233-6233 or info@theatlasfinancialgroup.com. The information herein has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. The registration as an investment adviser does not imply a certain level of skill or training. Additional information about AFG, is also available on the Securities and Exchange Commission's website at www.adviserinfo.sec.gov

ITEM 1. INTRODUCTION

AFG is an investment adviser registered with the Securities and Exchange Commission (SEC). We offer discretionary and non-discretionary portfolio management services to our clients and prospective clients. Discretionary accounts provide AFG the authority to make investment decisions on behalf of the client. Non-discretionary accounts, on the other hand, leave the ultimate decision regarding the purchase or sale of investments solely on the client. AFG provides the following services to its clients: Investment Advisory, Portfolio Management, Business Consulting, Retirement Planning, Corporate and Administration services.

There are available free and simple tools you may utilize to inform yourself further and research our firm and/or our financial advisors. You may do so at Investor.gov/CRS, which also provides educational material about broker-dealers, investment advisers and investing. We encourage you to use these tools before you make an investment decision.

ITEM 2. RELATIONSHIPS AND SERVICES

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

The advisor's main approach is to use three levels of analysis: a) at a general level, top-down macroeconomic analysis, to determine general economic conditions and potential macroeconomic risks or opportunities worldwide; b) at a security level, fundamental and financial analysis to determine the attractiveness of a particular security; and c) to a lesser extent, for the execution of investment decisions, technical analysis to determine the timing of purchases or sales of selected securities. Clients may select one or more model portfolio strategies, according to their risk profile and investment objectives. Model Portfolios are managed on a discretionary basis by The Atlas Financial Group's Investment Committee, which develops the portfolio asset allocation, selects the underlying securities populating the respective model strategy and periodically rebalances the client's account to the original allocation. Based upon the client's financial needs and investment objectives, the financial advisor assists the client in selecting the appropriate strategy. Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 via the following link: <https://adviserinfo.sec.gov/firm/brochure/306849>.

As a retail investor, you may ask us the following questions to start a conversation about relationships and services: "Given my financial situation, should I choose an investment advisory service? Why or why not?" "How will you choose investment to recommend to me?"

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

ITEM 3. FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT

Q: What fees will I pay?

AFG offers advisory services for a fee that is set in and governed by the Advisory Agreement between you, as the Client, and AFG, as the Investment Advisor. The fees charged to each client are a function of the type of portfolio. These fees range from 0.50% to 2% per annum (payable on a quarterly basis, calculated as annual percentage divided by 365 days then multiplied by the Net Asset Value of the accounts under administration times the number of days in the quarter). For detailed information, refer to our Form ADV Part 2A, Items 5 and 6 via the following link: <https://adviserinfo.sec.gov/firm/brochure/306849>.

The fees charged to each client are a function of the type of portfolio. These fees range from 0.50% to 2% per annum (payable on a quarterly basis, calculated as annual percentage divided by 365 days then multiplied by the Net Asset Value of the accounts under administration times the number of days in the quarter). These fees may be negotiated by the advisor under unusual circumstances, at the sole discretion of the advisor. In certain circumstances, and at the sole discretion of the advisor, fees may be charged in arrears. In those cases, advisor will submit an invoice for advisory services to the client. These fees may be billed on a monthly or quarterly basis, as agreed with the client.

Investment vehicles managed by third parties, including mutual funds, closed end funds, ETF's and private funds and hedge funds, all charge their own fees, which will generally include a management fee, other fund expenses, and a possible distribution fee. These fees and expenses are described in each fund's prospectus. Additionally, custodians and broker dealers may charge additional transaction and service fees related to the services they provide; These are also separate. AFG does attempt to negotiate these fees as much as possible for the benefit of its clients. Some custodians and brokers charge may charge different fees, but also provide different levels of service. We will discuss with you the differences and choices available to you.

The firm may choose to recommend and invest its advisory clients in affiliated or unaffiliated Private Funds or Hedge Funds, that may be managed, advised or co-advised by the firm or an affiliated entity and for which the Advisor may be compensated directly or indirectly.

Under certain circumstances, and at the sole discretion of the advisor, negotiated fees may differ from what is stated above.

All clients should review both the fees charged by the firm for its advisory services, any fees charged by the investment funds that are part of the investment portfolio advised by the firm, including fees related to the firm's sponsored pooled investment vehicles, and finally the schedule of fees that are charged by the brokers or custodian to fully understand the total fees to be paid. It is important to note that you will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time.

A client may pay more or less fees than similar clients depending on the particular circumstances of the client, size, additional or

differing levels of servicing or as otherwise agreed with specific clients. Clients that negotiate fees, including a flat fee, may end up paying a higher fee than that set forth above as a result of fluctuations in the client's assets under management and account performance.

As a retail investor, you may ask a financial professional the following questions to start a conversation about the impact of fees and costs to your investments: "Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?"

Q. "What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?"

When we act as your investment adviser, we must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money may create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. The following are some potential conflicts: We may recommend that you invest in our sponsored pooled investment vehicles or use a third-party money manager ("MM") which may share with us the advisory fees you pay the MM. Our compensation may differ significantly depending upon the proportion of your account that is invested in the firm's sponsored pooled investment vehicles or MMs with which we have fee sharing agreement. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend these services and investment vehicles. You are not obligated, contractually or otherwise, to use the services of any MM we recommend. In some cases, we may refer clients in need of additional services and products including but not retirement and estate planning services or other services. We have specific arrangements with such third parties whereby we, or an affiliated entity, may be compensated for the referral in the form of bonuses, a percentage of premiums, profit sharing and/or other remuneration. Please be advised that because of these referral arrangements we have an incentive to recommend these additional products and services as well as the specific vendors with we have a referral relationship. You are under no obligation to purchase insurance, planning or any other similar services.

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

To address and mitigate potential conflicts of interests, AFG has developed written policies and a Code of Ethics. We will notify you in case additional conflicts ever arise. Refer to our Form ADV Part 2A via the following link: https://files.adviserinfo.sec.gov/IAPD/Content/Common/crd_iapd_Brochure.aspx?BRCHR_VRSN_ID=850548 to help you understand what conflicts exist.

Q. How do your financial professionals make money?

AFG's compensation for investment professionals is based on individual arrangements with each employee. Our Advisors may receive a fixed salary, a variable compensation based on their assets under management and the advisory fees charged to our clients or a combination of both.

ITEM 4. DISCIPLINARY HISTORY

Q. Do your financial professionals have legal or disciplinary history?

Yes, Mr. Luis Alayo-Riera does have reportable legal and disciplinary history that are material to a client's evaluation of our advisory business or the integrity of our management. Disciplinary history can be found on FINRA's BrokerCheck system at www.finra.org/brokercheck and/or the SEC's website at www.adviserinfo.sec.gov. You may find detailed information by typing the representative's name and downloading the full report, read under "Disclosure Event Details". Additional information about this Form CRS is available at investor.gov/crs.

***As a retail investor, you may ask a financial professional the following question to start a conversation:
As a financial professional, do you have any disciplinary history? For what type of conduct?***

ITEM 5. ADDITIONAL INFORMATION

You can find additional information about your investment advisory services and request a copy of the relationship summary by contacting us at (786) 233-6233 or info@theatlasfinancialgroup.com. You can also find additional information about AFG on the SEC's website at www.adviserinfo.sec.gov.

As a retail investor, you may ask a financial professional the following question to start a conversation about contacts and complaints: "Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?"