

# **LEVATUS LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: August 7, 2017**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of LEVATUS LLC (“LEVATUS” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (781) 249-1249.

LEVATUS 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 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 LEVATUS to assist you in determining whether to retain the Advisor.

Additional information about LEVATUS and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 287811.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of LEVATUS. For convenience, we have combined these documents into a single disclose document.

LEVATUS 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. LEVATUS 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 Advisor is transitioning from registration with the U.S. Securities and Exchange Commission ("SEC") to registration with Commonwealth of Massachusetts.

### 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](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 287811. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (781) 249-1249.

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#### LEVATUS LLC

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## Item 3 – Table of Contents

<b>Item 1 – Cover Page .....</b>	<b>1</b>
<b>Item 2 – Material Changes .....</b>	<b>2</b>
<b>Item 3 – Table of Contents .....</b>	<b>3</b>
<b>Item 4 – Advisory Services .....</b>	<b>4</b>
A. Firm Information .....	4
B. Advisory Services Offered .....	4
C. Client Account Management .....	5
D. Wrap Fee Programs .....	5
E. Assets Under Management .....	5
<b>Item 5 – Fees and Compensation .....</b>	<b>5</b>
A. Fees for Advisory Services .....	5
B. Fee Billing .....	6
C. Other Fees and Expenses .....	6
D. Advance Payment of Fees and Termination .....	6
E. Compensation for Sales of Securities .....	6
<b>Item 6 – Performance-Based Fees and Side-By-Side Management .....</b>	<b>7</b>
<b>Item 7 – Types of Clients .....</b>	<b>7</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>7</b>
A. Methods of Analysis .....	7
B. Risk of Loss .....	7
<b>Item 9 – Disciplinary Information .....</b>	<b>8</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations .....</b>	<b>9</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b>	<b>9</b>
A. Code of Ethics .....	9
B. Personal Trading with Material Interest .....	9
C. Personal Trading in Same Securities as Clients .....	9
D. Personal Trading at Same Time as Client .....	9
<b>Item 12 – Brokerage Practices .....</b>	<b>9</b>
A. Recommendation of Custodian[s] .....	9
B. Aggregating and Allocating Trades .....	10
<b>Item 13 – Review of Accounts .....</b>	<b>10</b>
A. Frequency of Reviews .....	10
B. Causes for Reviews .....	10
C. Review Reports .....	10
<b>Item 14 - Client Referrals and Other Compensation .....</b>	<b>11</b>
A. Compensation Received by LEVATUS .....	11
B. Client Referrals from Solicitors .....	11
<b>Item 15 – Custody .....</b>	<b>11</b>
<b>Item 16 – Investment Discretion .....</b>	<b>12</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>12</b>
<b>Item 18 – Financial Information .....</b>	<b>12</b>
<b>Item 19 – Requirements for State Registered Advisors .....</b>	<b>12</b>
A. Educational Background and Business Experience of Principal Officer .....	12
B. Other Business Activities of Principal Officer .....	12
C. Performance Fee Calculations .....	12
D. Disciplinary Information .....	12
E. Material Relationships with Issuers of Securities .....	13
<b>Form ADV Part 2B – Brochure Supplement .....</b>	<b>14</b>
<b>Privacy Policy .....</b>	<b>16</b>

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### LEVATUS LLC

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

LEVATUS LLC (“LEVATUS” 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 Commonwealth of Massachusetts. LEVATUS was founded in March 2017 as The Nexus Partnership LLC. In July 2017, The Advisor amended its name to LEVATUS. The Advisor is owned by the Nexus Group LLC and operated by Susan E. Dahl (Managing Member and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by LEVATUS.

### **B. Advisory Services Offered**

LEVATUS offers advisory services to individuals, high net worth individuals, trusts, and estates in the Commonwealth of Massachusetts (each referred to as a “Client”).

#### Wealth Management Services

LEVATUS provides Clients with wealth management services, which generally includes a broad range of comprehensive financial planning and consulting services in connection with discretionary management of investment portfolios. These services are described below.

#### Investment Management Services

LEVATUS provides investment advisory solutions for its Clients. LEVATUS will make investment recommendations only after discussions with Clients on their investment goals and objectives as well as risk tolerance and financial situation. After a thorough discussion with the Client, LEVATUS constructs a portfolio for each client which will consist of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. LEVATUS may also utilize individual stocks, bonds, or options contracts if it is in the Client’s best interest. For certain Clients, the Advisor may utilize real estate investment trusts or alternative investment depending on the Client’s risk profile. The Advisor may retain certain types of investments based on a Client’s legacy portfolio construction.

LEVATUS’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. LEVATUS 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.

LEVATUS evaluates and selects investments for inclusion in Client portfolios after discussing an investment strategy with the Client. LEVATUS may recommend, on occasion, redistributing investment allocations to diversify the portfolio. LEVATUS 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. LEVATUS may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will LEVATUS accept or maintain custody of a Client’s funds or securities, except for authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client wealth management agreement. Please see Item 12 – Brokerage Practices.

#### Financial Planning Services

LEVATUS will typically provide comprehensive financial planning and consulting services to Clients as a component of its comprehensive wealth management services, pursuant to a written wealth management

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agreement. These services cover several areas of a Client's financial situation, depending on their goals, objectives and financial condition. Generally, such financial planning will be tailored to each Client's needs including, but not limited to investment planning, retirement planning, personal savings and education savings.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

LEVATUS may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. The Advisor will coordinate with these specialists in order to provide a comprehensive approach to the wealth management services. For certain engagements, the Advisor may also provide a written summary of the Client's financial situation, observations, and recommendations.

### **C. Client Account Management**

Prior to engaging LEVATUS to provide advisory services, each Client is required to enter into a wealth management agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

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

### **D. Wrap Fee Programs**

LEVATUS does not manage or place Client assets into a wrap fee program. Wealth management services are provided directly by LEVATUS.

### **E. Assets Under Management**

LEVATUS is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2017 fiscal year end. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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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 a written agreement with the Advisor.

### **A. Fees for Advisory Services**

#### Wealth Management Services

Wealth management fees are paid quarterly, in advance, pursuant to the terms of the agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Wealth management fees range from 1.25% to 0.50% 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.

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The wealth management 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 discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by LEVATUS will be independently valued by the designated Custodian. LEVATUS will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

## **B. Fee Billing**

### Wealth Management Services

Wealth management 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 each time a fee is directly deducted, 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 LEVATUS at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management 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 LEVATUS to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than LEVATUS, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer. The fees charged by LEVATUS are separate and distinct from these custodial and execution fees.

In addition, all fees paid to LEVATUS for wealth management services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of LEVATUS, but would not receive the services provided by LEVATUS 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 LEVATUS 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**

### Wealth Management Services

LEVATUS is compensated for its services in advance of the quarter in which advisory services are rendered. Either party may terminate the wealth management agreement by providing advance written notice to the other party. In addition, the Client may terminate the wealth management 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 wealth management fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior approval.

## **E. Compensation for Sales of Securities**

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LEVATUS does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the wealth management fees noted above.

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

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

LEVATUS 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**

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

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

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### **A. Methods of Analysis**

LEVATUS primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from LEVATUS 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 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”.

As noted above, LEVATUS generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. LEVATUS 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, LEVATUS 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. LEVATUS 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. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the potential speculative components of the Advisor's strategy:

#### Mutual Funds and Exchange-traded Funds (ETFs)

The performance of mutual funds and ETFs are subject to market risk, including the possible loss of principal. The value of the mutual funds or ETFs will fluctuate with the value of the underlying securities that make up the fund.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

#### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

**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**

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**There are no legal, regulatory or disciplinary events involving LEVATUS or any of its management persons.** LEVATUS 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 on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 287811.



## Item 10 – Other Financial Industry Activities and Affiliations

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The sole business of LEVATUS and Susan E. Dahl (Managing Member and Chief Compliance Officer) is to provide advisory services to its Clients. Neither LEVATUS nor its advisory personnel are involved in other business endeavors. LEVATUS does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

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

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### A. Code of Ethics

LEVATUS has implemented a Code of Ethics (the "Code") that defines our fiduciary commitment to each Client. This Code applies to all persons associated with LEVATUS (our "Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. LEVATUS and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of LEVATUS' 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 (781) 249-1249.

### B. Personal Trading with Material Interest

LEVATUS allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. LEVATUS 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. LEVATUS does not have a material interest in any securities traded in Client accounts.

### C. Personal Trading in Same Securities as Clients

LEVATUS 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 that 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 LEVATUS by conducting a coordinated review of the accounts of Supervised Persons and the accounts of the Clients. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### D. Personal Trading at Same Time as Client

While LEVATUS 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 LEVATUS, or any Supervised Person of LEVATUS, transact in any security to the detriment of any Client.**

## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

LEVATUS does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize LEVATUS to direct trades to this Custodian as agreed in the wealth management agreement. Further, LEVATUS does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

While LEVATUS does not have the discretionary authority to select a custodian, LEVATUS will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's qualified custodian. LEVATUS will maintain 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 LEVATUS:

**1. Soft Dollars** - Soft dollars are revenue programs offered by custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. LEVATUS does not participate in soft dollar programs sponsored or offered by any broker-dealer-custodian. However, the Advisor does receive certain economic benefits from Schwab as detailed in Item 14 below.

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

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

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. LEVATUS will execute its transactions through an unaffiliated broker-dealer selected by the Client. LEVATUS may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer 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.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Susan E. Dahl, Chief Compliance Officer of LEVATUS. Formal reviews are generally conducted at least annually or more or less 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 or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify LEVATUS 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 trustee or Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic

access to 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**

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### **A. Compensation Received by LEVATUS**

LEVATUS is a fee-only advisory firm, that is compensated solely by its Clients and not from any investment product. LEVATUS does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. LEVATUS may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, LEVATUS may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

LEVATUS has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like LEVATUS. As a registered investment advisor participating on the Schwab Advisor Services platform, LEVATUS 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, but not all services provided by Schwab will benefit Clients. Clients should be aware, however, that the receipt of economic benefits from any 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 LEVATUS that may not benefit the Client, including: educational conferences and events 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. LEVATUS believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

### **B. Client Referrals from Solicitors**

LEVATUS does not engage paid solicitors for Client referrals.

## **Item 15 – Custody**

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LEVATUS 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 LEVATUS to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by LEVATUS to ensure accuracy, as the Custodian does not perform this review. For more information

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

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## Item 16 – Investment Discretion

LEVATUS 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 LEVATUS. 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 a wealth management agreement containing all applicable limitations to such authority. All discretionary trades made by LEVATUS will be in accordance with each Client's investment objectives and goals.

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## Item 17 – Voting Client Securities

LEVATUS 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.

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## Item 18 – Financial Information

Neither LEVATUS, nor its management, have any adverse financial situations that would reasonably impair the ability of LEVATUS to meet all obligations to its Clients. Neither LEVATUS, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. LEVATUS is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

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## Item 19 – Requirements for State Registered Advisors

### A. Educational Background and Business Experience of Principal Officer

The Managing Member and Chief Compliance Officer of LEVATUS is Susan E. Dahl. Information regarding the formal education and background of Ms. Dahl is included in Item 2 of the Part 2B below.

### B. Other Business Activities of Principal Officer

Ms. Dahl is dedicated to the investment advisory activities of LEVATUS' Clients. Ms. Dahl does not have any other business activities.

### C. Performance Fee Calculations

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

### D. Disciplinary Information

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

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. Dahl.***

However, we do encourage you to independently view the background of Ms. Dahl on the Investment Adviser

Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 1784216. Additionally, disciplinary information for Ms. Dahl can be obtained by contacting the Massachusetts Securities Division at (617) 727-3548.

**E. Material Relationships with Issuers of Securities**

Neither LEVATUS nor Ms. Dahl have any relationships or arrangements with issuers of securities.

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# **Form ADV Part 2B – Brochure Supplement**

**for**

**Susan E. Dahl  
Managing Member and Chief Compliance Officer**

**Effective: August 7, 2017**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Susan E. Dahl (CRD# 1784216) in addition to the information contained in the LEVATUS LLC (“LEVATUS” or the “Advisor”, CRD# 287811) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the LEVATUS Disclosure Brochure or this Brochure Supplement, please contact us at (781) 249-1249.

Additional information about Ms. Dahl is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 1784216.

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## Item 2 – Educational Background and Business Experience

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Susan E. Dahl, born in 1965, is dedicated to advising Clients of LEVATUS as the Managing Member and Chief Compliance Officer. Ms. Dahl also earned a Bachelor of Arts in Government from Colby College in 1987. Additional information regarding Ms. Dahl's employment history is included below.

### Employment History:

Managing Member, LEVATUS LLC	02/2017 to Present
Managing Director, Chief Investment Officer, Bainco International Investors LLC	03/2009 to 03/2017
Partner, Newbury Street Capital LP	03/2009 to 12/2016

## Item 3 – Disciplinary Information

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

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. Dahl.***

However, we do encourage you to independently view the background of Ms. Dahl on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 1784216.

## Item 4 – Other Business Activities

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Ms. Dahl is dedicated to the investment advisory activities of LEVATUS' Clients. Ms. Dahl does not have any other business activities.

## Item 5 – Additional Compensation

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Ms. Dahl is dedicated to the investment advisory activities of LEVATUS' Clients. Ms. Dahl does not receive any additional forms of compensation.

## Item 6 – Supervision

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Ms. Dahl serves as the Managing Member and Chief Compliance Officer of LEVATUS. Ms. Dahl can be reached at (781) 249-1249.



## Privacy Policy

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Effective: August 7, 2017

### Our Commitment to You

LEVATUS LLC ("LEVATUS" 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. LEVATUS (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.

LEVATUS 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?
<b>Servicing our Clients</b> 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
<b>Marketing Purposes</b> LEVATUS 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 LEVATUS or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> 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
<b>Information About Former Clients</b> LEVATUS 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 (781) 249-1249.