

Item 1: Cover Page
Part 2A Appendix 1 of Form ADV: Wrap Fee Brochure
March 2020

Opus Wealth Wrap Program

Sponsored By:

Opus Wealth Partners, LLC
Doing business as:

Opus Wealth Management Group

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This brochure provides information about the qualifications and business practices of Opus Wealth Partners LLC, dba Opus Wealth Management Group. If you have any questions about the contents of this brochure, please contact us by telephone at (331) 777-9900. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Authority. Additional information about Opus Wealth Partners, LLC also is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD # 176525.

Please note that the use of the term "registered investment adviser" and description of Opus Wealth Management Group and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Material Changes

Opus Wealth Management Group is required to make clients aware of information that has changed since the last annual update to the Wrap Brochure and that may be important to them. Clients can then determine whether to review the brochure in its entirety or to contact us with questions about the changes.

Since filing the firm's most recent amendment to this brochure on March 2019, we have made the following changes:

- Item 4 (Advisory Services) has been updated to include disclosures relating to fees associated with mutual funds and exchange traded funds and associated conflicts.
- Item 6 (Other Fees or Expenses) has been updated to include disclosure relating to mutual fund share class policies and fee billing procedures.
- Item 7 (Brokerage Practices) has been updated to include disclosures relating to mutual fund exchange practices
- Item 7 (Custody) has been updated to include circumstances of custody that may be triggered with the use of third-party standing letters of authorization and referrals to a related custodian.
- Item 10 (Financial Information) has been updated to include information related to custody.

We will ensure that you receive a summary of material changes, if any, to this and subsequent disclosure brochures within 120 days after our fiscal year ends. Our fiscal year ends on December 31, so you will receive the summary of material changes, if any, no later than April 30 each year. At that time, we will also offer a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

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Item 4: Services, Fees and Compensation

We offer wrap fee programs as described in this Wrap Fee Program Brochure. Our wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc.

A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management and/or advice concerning selection of other advisers, and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). This results in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

Our Wrap Advisory Services

Wrap Asset Management:

We emphasize continuous and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange traded funds ("ETFs"), options, mutual funds and other public and private securities or investments. The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals, and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

Wrap Comprehensive Portfolio Management:

Our comprehensive portfolio management service encompasses asset management as well as providing financial planning/financial consulting to clients. It is designed to assist clients in meeting their financial goals through the use of financial investments. We conduct at least one, but sometimes more than one meeting (in person if possible, otherwise via telephone conference) with clients in order to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what we learn, we propose an investment approach to the client. We may propose an investment portfolio, consisting of exchange traded funds, mutual funds, individual stocks or bonds, or other securities. Upon the client's agreement to the proposed investment plan, we work with the client to establish or transfer investment accounts so that we can manage the client's portfolio. Once the relevant accounts are under our management, we review such accounts on a regular basis and at least quarterly. We may periodically rebalance or adjust client accounts under our management. If the client experiences any significant

changes to his/her financial or personal circumstances, the client must notify us so that we can consider such information in managing the client's investments.

Fee Schedule

The maximum annual advisory fee charged will not exceed 2.50%. The fee assessed each account will be detailed in the advisory agreement to be signed by the client. Fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last day of the previous quarter. Our fees are negotiable. Fees will be adjusted for deposits and withdrawals made during the quarter and will be deducted from your managed account. As part of this process, clients are made aware of the following:

- a) LPL Financial, LLC ("LPL") as the client's custodian sends statements at least quarterly showing all account disbursements, including the amount of the advisory fees paid to us;
- b) Clients provide authorization permitting LPL to deduct these fees;
- c) LPL calculates the advisory fees for all fee schedules and deducts them from the client's account(s).

Other Types of Fees & Expenses:

You may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm.

We do not recommend or offer the wrap program services of other providers. Our investment advisory representatives receive a portion of the advisory fee that you pay us, either directly as a percentage of your overall fee or as their salary from our firm. In cases where our investment advisory representatives are paid a percentage of your overall advisory fee, this may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, we may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement if your account is not actively traded.

Opus and its Advisory Representatives may include mutual funds and exchange traded funds, (ETFs) in asset management strategies. Opus's general policy is to purchase institutional share classes of those mutual funds that may be selected for a client's portfolio. The institutional share class generally has the lowest expense ratio and are less costly for a client to hold than Class A shares or other share classes that are eligible for purchase in an advisory account. The expense ratio is the annual fee that all mutual funds or ETFs charge their shareholders. It expresses the percentage of the assets deducted each fiscal year for fund expenses, including 12b-1 fees, management fees, administrative fees, operating costs, and all other asset-based costs incurred by the fund. Some fund families offer different classes of the same fund and one share class may have a lower expense ratio than another share class. The expenses come from the client assets which could impact the client's account performance. Mutual fund expense ratios are in addition to our fee and we do not receive any portion of these charges. Mutual funds that offer institutional share classes, advisory share classes and other

share classes with lower expense ratios are available to investors who meet specific eligibility requirements that are described in the mutual fund's prospectus or its statement of additional information. These eligibility requirements include, but may not be limited to, investments meeting certain minimum dollar amounts and accounts that the fund considers qualified fee-based programs. If an institutional share class is not available for the mutual fund selected, the adviser will endeavor to purchase the least expensive share class available for that particular mutual fund. However, the lowest-cost mutual fund share class for a particular fund may not be offered or available through specific types of Opus program accounts. Clients should never assume that they will be invested in the share class with the lowest possible expense ratio or cost.

In addition to reading this Brochure carefully, Opus urges clients to discuss with their advisor whether lower-cost share classes are appropriate and available in their particular program account in consideration of their expected investment holding periods, amounts invested, and anticipated trading frequency. Clients should also ask their advisor why the particular funds or other investments that will be purchased or held in their managed account are appropriate for them in consideration of their expected holding period, investment objective, risk tolerance, time horizon, financial condition, amount invested, trading frequency, the amount of advisory fee charged, whether the client will pay transactions charges for fund purchases and sales, whether clients will pay higher internal fund expenses in lieu of transactions charges that could adversely affect long-term performance, and relevant tax considerations. Your advisor may recommend, select, or continue to hold a fund share class that charges you higher internal expenses than other available share classes for the same fund. Further information regarding fees and charges assessed by a mutual fund is available in the appropriate mutual fund prospectus

Item 5: Account Requirements & Types of Clients

Types of clients we typically manage wrap fee accounts on behalf of, include:

- Individuals and High Net-Worth Individuals;
- Trusts, Estates or Charitable Organizations;
- Pension and Profit-Sharing Plans;
- Corporations, Limited Liability Companies and/or Other Business Types.

Item 6: Portfolio Manager Selection & Evaluation

Our firm and its related persons act as portfolio manager(s) for this wrap fee program. This may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services. Our related person portfolio managers are not subject to the same selection and review as outside portfolio managers that participate in the wrap fee program. This is because we have chosen not to utilize outside portfolio managers.

Advisory Business:

See Item 4 for information about our wrap fee advisory program. We offer individualized investment advice to clients utilizing our Wrap Comprehensive Portfolio Management service. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account.

Participation in Wrap Fee Programs:

Our wrap fee and non-wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc. We do not manage wrap fee accounts in a different fashion than non-wrap fee accounts.

Performance-Based Fees & Side-By-Side Management:

We do not charge performance fees to our clients.

Methods of Analysis, Investment Strategies & Risk of Loss:

We may use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Charting: In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.

Technical Analysis: We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis: In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-Term Purchases: When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell. Typically we employ this

sub-strategy when we believe the securities to be well valued; and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.

Short-Term Purchases: When utilizing this strategy, we may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Trading: We purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings.

Short Sales: We borrow shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed shares are then sold. On the agreed-upon future date, we buy the same stock and return the shares to the original owner. We engage in short selling based on our determination that the stock will go down in price after we have borrowed the shares. If we are correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

Margin Transactions: We will purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us to purchase stock without selling other holdings.

Option Writing: We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset. The two types of options are calls and puts. A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires. A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires.

Please Note: Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

Voting Client Securities:

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Account Product Suitability: Mutual Fund Share Class Considerations

Descriptions of Share Class Types- Shares of the same fund offer different shareholder rights and obligations, such as different fee and load charges. Common share classes are A (front-end load), B (deferred fees), C (no sales charge and a relatively high annual 12b-1 fee). Multi-class funds hold the same investment portfolio for all classes, and differ only in their surrounding fee structure.

A

Funds that have lower investment minimums and carry a front-load to pay the advisors' sales commission. This charge comes right off the top of the investment. A shares are usually the most cost-effective for long term investors who are using a commission-based broker to transact. Typically, the maximum front load is between 4% and 5.75%, the maximum deferred load is zero, the maximum 12b-1 fee is between 0 and 50 bps and the investment minimum is \$2,500 or less.

Adv

Funds typically purchased through advisors, but generally requiring a higher minimum investment. Known as Adv Advisor. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is between 0 and 50 bps, and the investment minimum is \$2,500 or less.

B

Funds that have lower investment minimums and carry a deferred-load sales charge, also called a surrender charge. B shares are typically not the most economical choice because their expense ratios that are paid year after year are typically higher than A shares. An investor may pay a charge when selling shares of the fund if they are redeemed before specified time periods, typically within five years. The sales charge decreases with the time invested such that the surrender charge is higher in year one than it is in year five. Typically, the maximum front load is 0%, the maximum deferred load is between 4% and 5%, the maximum 12b-1 fee is between 75 and 100 bps, and the investment minimum is \$2,500 or less.

C

Funds that have lower investment minimums and carry a level-load structure. This sales charge is typically a recurring fee of 1% that is used on an annual basis to compensate advisors. C shares do not include a front-end sales charge, but their expense ratio is typically higher than B shares. Typically, the maximum front load is 0% and occasionally 1%, the maximum deferred load is 1% and occasionally 0%, the maximum 12b-1 fees is between 75 and 100 bps, and the investment minimum is \$2,500 or less.

D

Funds that have lower investment minimums and carry a level-load structure. This sales charge is typically a recurring fee of 1% that is used on an annual basis to compensate advisors. D shares are typically carried by broker-sold fund shops. These are usually no load shares that are available through larger mutual fund providers such as TD Ameritrade. Although there are no front-end or back-end loads with D shares, an investor will typically be charged a transaction fee to buy into this share class. Typically, the maximum front load is 0%, the maximum deferred load is 0% and occasionally 1%, the maximum 12b-1 fee is 0% and occasionally between 1 and 50 bps, and the investment minimum is \$2,000 or more.

Inst

Funds typically purchased by large institutional buyers, such as pension plans. These share classes are typically only offered to investors who invest \$1 million or more. Invariably, institutional shares have the lowest expenses in the mutual fund universe. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is 0%, and the investment minimum is \$25,000 or more. Also known as I or Y shares.

Inv

Investor share classes can be purchased by individual investors, so there is usually no front or deferred load charged. However, investment minimums may be slightly higher. Also known as Investor or Investment. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is sometimes 0% and sometimes between 1bp and 25 bps, and the investment minimum is \$10,000 or less.

M

Typically, M shares carry lower front-end loads than A shares and are available to investors with larger initial investments. Typically, the maximum front load is either 0% or between 1% and 3.5%, the maximum deferred load is 0%, the maximum 12b-1 fee is sometimes 0% and sometimes between 25 bps and 100 bps, and the investment minimum is \$50,000 or more.

N

Typically, N shares are available to investors with larger initial investments. Many also charge a 12b-1 fee. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is between 25 and 50 bps, and the investment minimum is \$50,000 or more. No Load Funds without front- or back-end sales charges. Purchased directly by investors or through advisors. The typical no-load fund does not carry any letters after its name, though no-load share classes are sometimes tagged as “retail” or “investor” shares. No-load means an investor will not pay a broker to buy and sell their shares, they are able to execute the trades on their own. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is between 0 and 100 bps, and the investment minimum is \$2,500 or less.

Other

Funds not elsewhere classified. This category contains fewer than 5% of all U.S. funds. Also known as most other share class letters. The maximum front load, the maximum deferred load, the maximum 12b-1 fee, and the investment minimum all vary widely.

R (Retirement)

Funds available through retirement plans. R share classes are purchased by retirement plan participants, usually without any sales loads. The fees that these funds charge range widely. Some R shares are ultra-low-cost, while others bundle in the record-keeping and other administrative costs associated with running the plan. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is between 25 and 50 bps, and the investment minimum varies. Also known as K and J shares.

S

S shares are former no-load share classes that have been closed to new investors. If an investor would like to buy into one of those funds for the first time, they will have to go through a broker and opt for the A,

B, or C share class. S share classes are similar to no load funds in that there is usually no front or deferred load charged. However, investment minimums may be slightly higher. Typically, the maximum front load is 0%, the maximum deferred load is 0%, the maximum 12b-1 fee is 0%, and the investment minimum is \$2,000 or more. Also known as Z shares.

T

Typically, T shares carry lower front-end loads than A shares and are available to investors with larger initial investments. Typically, the maximum front load is 0% but sometimes between 3% and 4.75%, the maximum deferred load is 0%, the maximum 12b-1 fee is sometimes 0% and sometimes between 25 bps and 50 bps, and the investment minimum is \$2,000 or more. T shares have a standard, maximum sales charge across all fund categories of 2.5% and a 0.25% 12b-1 fee.

Opus and its Advisory Representatives typically include mutual funds and exchange traded funds, (ETFs) in asset management strategies. Advisory Representatives associated with the firm are charged with knowing the share classes available and associated expenses for those funds offered to firm advisory clients through various advisory programs and platforms. Advisory Representatives are responsible for assessing total costs, including expenses to clients in order to ensure that funds purchased on behalf of clients are in the best interests of those clients given clients' stated investment objectives. Full and complete analysis and disclosures regarding mutual fund purchases, even within advisory programs and platforms is required.

Opus's general policy is to purchase institutional share classes of those mutual funds that may be selected for a client's portfolio. The institutional share class generally has the lowest expense ratio and are less costly for a client to hold than Class A shares or other share classes that are eligible for purchase in an advisory account. The expense ratio is the annual fee that all mutual funds or ETFs charge their shareholders. It expresses the percentage of the assets deducted each fiscal year for fund expenses, including 12b-1 fees, management fees, administrative fees, operating costs, and all other asset-based costs incurred by the fund. Some fund families offer different classes of the same fund and one share class may have a lower expense ratio than another share class. The expenses come from the client assets which could impact the client's account performance. Mutual fund expense ratios are in addition to the firm's advisory and the firm does not receive any portion of these charges. Mutual funds that offer institutional share classes, advisory share classes and other share classes with lower expense ratios are available to investors who meet specific eligibility requirements that are described in the mutual fund's prospectus or its statement of additional information. These eligibility requirements include, but may not be limited to, investments meeting certain minimum dollar amounts and accounts that the fund considers qualified fee-based programs. If an institutional share class is not available for the mutual fund selected, the advisory representative will endeavor to purchase the least expensive share class available for that particular mutual fund. However, the lowest-cost mutual fund share class for a particular fund may not be offered or available through specific types of LFAS program accounts.

In addition to reading the firm's Part Form ADV and Part 2A Brochure carefully, Opus will encourage advisory representatives to discuss with clients whether lower-cost share classes are appropriate and available in their particular program account in consideration of their expected investment holding periods, amounts invested, and anticipated trading frequency. Advisory representatives are expected to discuss with clients why the particular funds or other investments that will be purchased or held in their managed account are appropriate for them in consideration of their expected holding period, investment objective, risk tolerance, time horizon, financial condition, amount invested, trading frequency, the

amount of advisory fee charged, whether the client will pay transactions charges for fund purchases and sales, whether clients will pay higher internal fund expenses in lieu of transactions charges that could adversely affect long-term performance, and relevant tax considerations.

The Firm's CCO or delegated personnel will include periodic reviews of mutual fund share class holdings at all firm custodians to ensure that lowest share classes are selected in the best interest of advisory clients. Share class conversions shall systematically be facilitated as a result of such sweeps and exceptional items will be noted.

Item 7: Brokerage Practices

Mutual Fund Exchange Policies

In some instances, in order to facilitate mutual fund allocations for certain mutual fund families through LPL Financial advisory platforms with minimal transaction costs, the firm may initially purchase money market funds and promptly (within the next business day) reallocate to those funds that are deemed to be suitable for a client's stated investment objectives and goals. This practice is intended to reduce transaction costs associated with multiple purchases within the same mutual fund family in furtherance of a client's stated investment objectives. While this practice is intended to reduce transaction costs, it presents a conflict of interest as the initial money market purchase may not itself be consistent with a client's stated investment objective. Moreover, in the event Opus vs a client is responsible for transaction costs (i.e. wrap account), Opus may be incentivized to engage in this practice in order to reduce transaction costs that it is paying itself. Opus will mitigate this conflict by assessing at a client level, whether this practice is in the best interest of the client relative to transaction costs and in the event, is deemed to be within the client's best interest, will ensure that reallocations occur no later than the next business day following initial purchase of the mutual fund.

Fee Audits

The fee billing process for accounts custodied at LPL has been automated. Fees are automatically calculated and then reviewed by Operations personnel prior to deduction of fees from client accounts. Manual adjustments to calculated fees are only required in unusual situations such as an account being opened, closed, or changed between the report date and billing date, or other similar circumstances. All such adjustments and fee waivers are documented in the fee calculation module as the adjustments are made.

It is the policy of Opus that all of its management fees are authorized by the client to be automatically deducted from the client's accounts. Exceptions to this policy must be approved by the CCO and firm executive management.

When opening an account, the firm's operations personnel is responsible for documenting an approved fee ID code that corresponds to the client's annual fee schedule as it appears on the client agreement or fee schedule. If a new fee schedule and corresponding fee ID is required to match the schedule shown on the client agreement, operations must ensure the proposed new fee schedule is within the stated fee range according to the Opus Form ADV documents. Fees that fall outside of the Opus approved fee schedule must be approved by the CCO. Once approved, the new fee schedule and fee ID code are entered into the fee calculation system.

The Compliance Department is responsible for reviewing different disclosure documents provided to clients to ensure fee information is consistent across all documents. Such documents include the Form ADV brochures and client agreements.

Operations personnel are responsible for checking all fee-billing information, delivering instructions to account custodians, and reconciling fees paid by custodians to the amounts billed on the invoices. When using the LPL Financial advisory programs or any program where the custodian or third party does the fee calculation and fee billing on behalf of LFAS, the Compliance Department will audit the accuracy of the fees that are calculated and charged to the client on behalf of the firm. The following steps will be taken to verify the accuracy of the fees charged:

The Compliance team will perform a periodic audit sampling of client fees to verify the accuracy of the fee calculations and charges.

If it is determined that there are potential errors, the Operations Manager will contact the custodian of the account to have the potential errors investigated. If necessary, errors will then be corrected.

All fee-audit sampling records and fee error correction records will be maintained in a centralized file (either electronic or hard copy).

Custody

Custody, as it applies to investment advisers, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Opus does not take physical custody of your funds or securities. However, Opus is deemed to have custody of client funds and securities whenever Opus is given the authority to have fees deducted directly from client accounts or if Opus facilitates or executes your requests for third party standing letters of authorization that enable Opus to change the timing of the amount of the transfer upon your request. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

Opus has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. **Clients should carefully review those statements and are urged to compare the statements against reports received directly from Opus.** When clients have questions about their account statements, they should contact Opus or the qualified custodian preparing the statement.

Item 8: Client Information Provided to Portfolio Manager(s)

Our firm communicates with your portfolio manager(s) on a regular basis as needed (daily, weekly, monthly, etc) to ensure your most current investment goals and objectives are understood by your portfolio manager(s). In most cases, we will communicate such information as part of our regular investment management duties. Nevertheless, we will also communicate information to your portfolio manager(s) when you ask us to, when market or economic conditions make it prudent to do so, etc.

Item 9 Client Contact with Portfolio Manager(s)

Clients are always free to directly contact their portfolio manager(s) with any questions or concerns they have about their portfolios or other matters.

Item 10: Additional Information

Disciplinary Information

We have determined that our firm and management have no disciplinary information to disclose.

Financial Industry Activities & Affiliations

Representatives of our firm are registered representatives of LPL Financial, LLC member FINRA/SIPC. They may offer products and receive normal and customary commissions as a result of these transactions. A conflict of interest may arise as these commissionable securities sales may create an incentive to recommend products based on the compensation they may earn.

Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

An investment adviser is considered a fiduciary and our firm has a fiduciary duty to all clients. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided upon request.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a preclearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts¹. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates. Upon employment

¹ For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics.

Neither our firm nor a related person recommends to clients, or buys or sells for client accounts, securities in which our firm or a related person has a material financial interest. Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day. If related persons' accounts are included in a block trade, our related persons' accounts will be traded in the same manner every time.

Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics.

Review of Accounts

We review accounts on an annual basis for our Wrap Asset Management and Wrap Comprehensive Portfolio Management clients. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Our Financial Advisors or Portfolio Managers will conduct reviews. We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc. We do not provide written reports to clients, unless asked to do so. Verbal reports to clients take place on at least an annual basis when we meet with clients who subscribe to our Wrap Comprehensive Portfolio Management service.

Investment or Brokerage Discretion

We provide discretionary portfolio management services where the investment advice provided is custom tailored to meet the needs and investment objectives of each client. Accordingly, we are authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include the determination of securities to be purchased/sold and the amount of securities to be purchased/sold. We do not have discretionary authority over the broker or dealer to be used.

Suggestion of Brokers to Clients

We shall recommend LPL. LPL is the broker-dealer with which our representatives are also associated. As a result of the individual association of our representatives with LPL, we are generally required to utilize the brokerage/custodial services of LPL for investment advisory accounts. Our general policies relative to the execution of client securities brokerage transactions are as follows:

Execution of Brokerage Transactions (when applicable)

In seeking “best execution”, the determinative factor is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution. LPL also takes into consideration the full range of a broker-dealer's services including execution capability, commission rates, and responsiveness. Although LPL will seek competitive commission rates, it may not necessarily obtain the lowest possible commission rates for all account transactions.

Over-the-Counter (OTC) securities transactions are generally effected based on two (2) separate broker-dealers: (1) a “dealer” or “principal” acting as market-maker; and (2) the executing broker-dealer that acts in an agency capacity. Dealers executing principal transactions typically include a mark-up/down, which is included in the offer or bid price of the securities purchased or sold. In addition to the dealer mark-up/down, the client may also incur the transaction fee imposed by the executing broker-dealer. We do not receive any portion of the dealer markup/down or the executing broker-dealer transaction fee.

Transactions for each client account will be effected independently. We individually review each client's account and place trades accordingly. Despite being purchased or sold at approximately the same time all clients' transactions will incur individual transaction fees.

Additional Compensation

We may receive from LPL or a mutual fund company, without cost and/or at a discount non soft dollar support services and/or products, to assist us to better monitor and service client accounts maintained at such institutions. Included within the support services we may receive investment related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by us to assist us in our investment advisory business operations.

We also receive an economic benefit from LPL in the form of a loan, which is forgiven if we meet certain conditions in terms of maintaining a relationship with LPL. Please see detailed discussion of the conditions and potential conflicts of interest in Item 12 of ADV Part 2A.

Our clients do not pay more for investment transactions effected and/or assets maintained at LPL as result of this arrangement. There is no commitment made by us to LPL or any other institution as a result of the above arrangement.

In order to help facilitate the transition of Opus Wealth Management Group clients to LPL Financial's custodial platform, our Investment Adviser Representatives (“IARs”) received transition support from LPL Financial in the form of a five-year forgivable loan. The amount of the upfront loan represents a substantial payment and forgiveness of the loan and accrued interest is contingent upon the IARs' continued association with LPL Financial as a registered representative for the duration of the loan. Although the loan does not require that our IARs maintain a certain level of client assets with LPL Financial, this presents a conflict of interest in that our IARs have a financial incentive to

maintain a relationship with LPL Financial in order to benefit by having the loan forgiven. However, to the extent that our IARs recommend that clients use LPL Financial, it is because the IARs believe that it is in the clients' best interests to do so based on the quality and pricing of the execution, benefits of an integrated platform for brokerage and advisory accounts, and other services provided by LPL Financial.

Referral Fees

We do not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940.

Financial Information

Our firm is not required to provide financial information in this Brochure because we do not require the prepayment of more than \$1,200 in fees and six or more months in advance and we do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients. Our firm has never been the subject of a bankruptcy proceeding.

Opus does not take custody except under two conditions which are deemed to be custody by the SEC in light of our authority and ability to transfer funds.

- (1) Opus is deemed to have custody because of our ability to deduct advisory fees from your account. You will receive a statement at least quarterly directly from the account custodian reflecting the deduction of fees. Authorization to deduct fees is incorporated into the Investment Advisory Agreement executed between yourself and Opus.
- (2) Opus is also deemed to have custody if you establish a standing letter of authorization to direct us to transfer funds or securities from your account to a specified third party and you give us the authorization to change the timing and/or the amount of the transfer.