

Strength Capital Partners, LLC

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This brochure provides information about the qualifications and business practices of Strength Capital Partners, LLC. If you have any questions about the contents of this brochure, please contact us at 248-593-5800 or mark@strengthcapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Strength Capital Partners, LLC also is available on the SEC's website at www.adviserinfo.sec.gov

We are a registered investment adviser with the SEC. Our registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, is information you use to evaluate us (and other advisers) which are factors in your decision to hire us or to continue to maintain a mutually beneficial relationship.

Item 2: Material Changes

Since the last amendment to this brochure, we have amended the brochure to disclose that our current operations consist of evaluating and recommending the purchase of a controlling position in companies through the formation of collective acquisition vehicles.

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Item 4: Advisory Business

Strength Capital Partners, LLC evaluates and recommends the purchase of a controlling position in companies through the formation of collective acquisition vehicles (each a “Holding Company” and, collectively, the “Holding Companies”). Occasionally, a Holding Company may purchase a minority position in a company instead of a controlling position. The Holding Companies currently consist of DTM Holdings, LLC; SCP Safety, LLC; Universal Holdco, LLC; SCP TBI LLC; Americlean Holdings, LLC; SCP ESP, LLC; CalCo Holdings, LLC; RWS Holdings LLC; and Truesdell Holding Co.

In connection with the Holding Companies, Strength Capital Partners, LLC may enter into a management assistance services agreement with the controlled company pursuant to which Strength Capital Partners renders general corporate management assistance and advice on strategy, organization, corporate finance, business investment and the general operation of the business of the company and its subsidiaries (referred to herein as “Consulting Services”).

The total assets under management of the Holding Companies is \$129,374,000 as of December 31, 2020. As of December 31, 2020, we did not manage any assets on a non-discretionary basis.

We have been in business since June, 2000. Our principal owners are Mark McCammon and Michael Bergeron.

Item 5: Fees and Compensation

With regard to Consulting Services, we charge a quarterly service fee equal to up to three percent (3.0%) of a company’s EBITDA, subject to an agreed to minimum.

Item 6: Performance-Based Fees and Side-by-Side Management

We do not charge advisory fees based on a share of the capital appreciation of the securities in a client account (so called performance based fees) at this time.

We do not currently manage accounts other than the Holding Companies. If we managed other accounts, the side-by-side management of both the Holding Companies and other accounts might raise potential conflicts of interest. We have developed policies and procedures reasonably designed to mitigate these conflicts should they arise.

Item 7: Types of Clients

As noted above, we evaluate and recommend the purchase of a controlling position in companies through the formation of collective acquisition vehicles. In connection with these Holding Companies, we generally enter into a management assistance services agreement with the controlled company pursuant to which we render consulting services.

Item 8: Method of Analysis, Investment Strategies and Risk of Loss

We have a fundamental approach to our securities analysis, relying on the inspection of corporate activities as an information source. When implementing our investment advice given to clients, our investment strategy involves long-term purchases. Please note that investing in securities does include the risk of loss that a client should be prepared to bear.

In the past decade financial markets throughout the world have experienced increased volatility, depressed valuations, decreased liquidity and heightened uncertainty. A rise in protectionist trade policies, slowing global economic growth, risks associated with pandemic and epidemic diseases (such as SARS-CoV-2, which causes coronavirus disease 2019, or COVID-19), risks associated with the United Kingdom's departure from the European Union, the risk of trade disputes, and the possibility of changes to some international trade agreements, could negatively affect the value of companies in which we invest, in ways that cannot necessarily be foreseen at the present time. Recently, pandemics and other widespread public health emergencies, including outbreaks of infectious diseases such as SARS, H1N1/09 flu, avian flu, ebola and the current outbreak of COVID-19, have and are resulting in market volatility and disruption, and future such emergencies have the potential to materially and adversely impact

economic production and activity in ways that are impossible to predict, all of which may negatively impact the value of the companies in which we invest.

Item 9: Disciplinary Information

There have been no disciplinary actions against us or any of our principals or employees within the last ten years by any domestic, foreign or military court; the SEC, any other federal regulatory agency; any state regulatory agency or any foreign financial regulatory authority; or any self-regulatory organization (SRO).

Item 10: Other Financial Industry Activities and Affiliations

We do not have financial industry activities outside of our advisory business described herein. We do not have financial industry affiliations.

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

We have adopted a Code of Ethics and Professional Standards (the “Code”) for avoiding prohibited acts and designed to eliminate potential conflicts of interest. The Code works in conjunction with our written Statement of Policy and Procedures (the “Statement”) designed to detect and prevent insider trading and to govern personal securities trading. Such statement, among other things, forbids any member or employee from trading, either personally or on behalf of others, on material non-public information or communicating material non-public information to others in violation of the law (i.e. insider trading).

We, our principals and employees, may buy or sell securities that we also recommend to our clients. Therefore, our Code sets forth our policy that clients’ interests are always placed ahead of our personal interests. Our policy requires our personnel to do their buying and selling after transactions have been completed for clients and includes procedures requiring all of our principals and employees to report their personal securities transactions to the designated supervisor on a periodic basis. We

believe that the Code and Statement designed to detect and prevent insider trading and to govern personal securities trading are appropriate to prevent or eliminate potential conflicts of interest situations between us, our employees and our clients. However, clients should be aware that no set of rules can possibly anticipate or relieve all potential conflicts. We will provide a copy of their Code of Ethics to any client or prospective client upon request.

Item 12: Brokerage Practices

We determine in which companies we want to make a majority investment or a significant minority investment. We then form the collective acquisition vehicles, and we effect the purchase of the securities of the target companies.

Item 13: Review of Accounts

Our Portfolio Manager and sole reviewer, Mark R. McCammon, continually reviews all of our client accounts in light of individual client needs. All accounts have a very detailed review on a quarterly basis.

Item 14: Client Referrals and Other Compensation

We do not directly nor indirectly compensate any person for client referrals.

Item 15: Custody

We do not maintain physical custody of client assets. However, we are considered to have “constructive” custody of the Holding Companies’ assets.

The investors in a Holding Company receive annual audited financial statements within 120 days of the Holding Company’s fiscal year end. Investors also receive quarterly statements directly from us which describe the performance of the Holding Company. Investors should review such statements carefully.

Item 16: Investment Discretion

We determine in which companies we want to make a majority investment or a significant minority investment. Once the investment is made we have dispositive power regarding the investment, subject to the charter documents and offering documents for each Holding Company.

Item 17: Voting Client Securities

We do not vote proxies on behalf of our clients.

Item 18: Financial Information

There are no financial issues that are likely to impair our ability to meet our contractual commitments to clients.