

*This brochure supplement provides information about Tamir Shabat, Managing Member and Chief Compliance Officer, that supplements the LPS Financial LLC brochure. You should have received a copy of that brochure. Please contact Tamir Shabat if you did not receive LPS Financial LLC's brochure or if you have any questions about the contents of this supplement.*

# LPS Financial LLC

## Form ADV Part 2B – Individual Disclosure Brochure

for

**Tamir Shabat**

Personal CRD Number: 4799909

Investment Adviser Representative

LPS Financial LLC  
2535 Victory Blvd.  
Staten Island, N.Y., 10314  
(212) -328-7876  
(212) 328-7876

UPDATED: 03/22/2021

Registration does not imply a certain level of skill or training.

## Item 2: Educational Background and Business Experience

Name: Tamir Shabat

Born: 1978

Education: Bachelor's Degree in Accounting, College of Staten Island, 2000

### Business Background:

01/2018 - Present	Managing Member, LPS Financial LLC
12/2020 - Present	Managing Member, Vessel Capital Management, LLCC
01/2020 - Present	Chief Compliance Officer LPS Financial LLC
01/2018 - 12/2018	Chief Compliance Officer LPS Financial LLC
05/2011 - Present	Co-Founder/Managing Partner, Insurance Agent Life 143 LLC
02/2012 - 12/2017	Registered Representative SA Stone Wealth Management Inc.
05/2010 - 03/2012	Registered Representative Synergy Investment Group, LLC

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Tamir Shabat is an owner of Life 143, LLC, an insurance company and is a licensed insurance agent. From time to time, he will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. LPS Financial LLC always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of LPS Financial LLC in such individual's outside capacity.

Tamir Shabat is also owner of BKS18, LLC, a personal holding company.

LPS Financial LLC had a material relationship with IKE Group LLC ("IKE"), a related entity in which Mr. Shabat is an owner. IKE had entered into a separate arrangement with an unaffiliated private equity venture capital fund ("private fund") for the participation of profits realized by high-net-worth LPS qualified clients (as defined under section 2(a)(51) under the Investment Company Act of 1940) the firm places with the private fund. This arrangement represents a conflict of interest because the firm has an incentive to place clients in or recommend this unrelated private fund investment to its clients based on the potential receipt of profits by its affiliate rather than on its clients' best interest to receive the best available investment opportunity. Therefore, the receipt of compensation by the related entity from the private fund can compromise the fiduciary duty and objectivity of the firm's investment decisions made on behalf of its clients. This conflict is mitigated by:

- disclosing the conflict to its clients prior to investing the client in the private fund,
- adopting policies and procedures to reasonably ensure that investments and recommendations are in the best interest of clients; and
- not charging clients a management fee who investment in the private fund based on the value of the private fund holding in the investing client's separate account and only assesses a management fee on the portion of its client's separate account that represents other investment products managed by the firm.

In May of 2020, the contractual relationship between IKE Group and the unaffiliated private equity venture capital fund Manager was terminated. In March of 2021, IKE Group filed its final tax return, and will be dissolved.

Tamir Shabat is an owner and Manager of Vessel Capital Management LLC. Vessel Capital Management LLC serves as the manager of a number of Delaware series limited liability companies operating as private equity funds under the brand "Vessel Capital

Partners.” LPS may recommend to certain accredited and qualified discretionary clients to invest in one or more of the VCP Funds. The recommending of a VCP Fund to LPS clients may create a conflict of interest because Vessel Capital Management entities owned and controlled by Mr. Shabat may receive income or profits as a result, and LPS clients may be subject to higher fees for investing in the VCP Funds than they might otherwise pay as LPS clients. The recommendations, therefore, can appear to be based on LPS’ interest in receiving higher fees rather than on the client’s interest to achieve his or her risk adjusted investment objective and goals. LPS diminishes this potential conflict of interest by not charging clients a separately managed account advisory fee in addition to the VCP Fund’s related advisory, management, and performance fees. Based on the clients’ desire to invest in VCP Funds, LPS recommends the VCP Funds only to clients who are accredited and/ or qualified (as defined by applicable federal securities laws).

#### Item 5: Additional Compensation

Tamir Shabat does not receive any economic benefit from someone who is not a client in exchange for providing clients advisory services through LPS Financial LLC.

Compensation for the activities of Life 143 LLC, IKE Group LLC (for which the final tax return has been filed) and for Vessel Capital Management LLC is described above.

#### Item 6: Supervision

As Chief Compliance Officer of LPS Financial LLC, Tamir Shabat supervises all duties and activities of the firm. Tamir Shabat adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm’s policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements. Tamir Shabat’s phone number is (212) 328-7876. He is supervised in his role as Chief Compliance Officer by Mr. Gaurav Lall, Managing Member of LPS.