We are Halo Securities, LLC (“Halo”), a limited purpose broker-dealer that is registered with the U.S Securities and Exchange Commission (“SEC”) and a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (SIPC). We are an affiliate of Halo Investing, Inc., a structured notes platform provider.

Brokerage services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing. Our firm and financial professionals’ registration information are also publicly available on Investor.gov or https://brokercheck.finra.org/.

What investment services and advice can you provide me?

• We do not provide conventional securities brokerage services. We do not sell stocks, bonds, mutual funds or, any other conventional investment products beside annuities and 529 plans.
• Our primary business activity is providing RIAs access to our proprietary platform for the purchase of structured notes for their clients. This business activity does not involve individual investors.
• We also offer the sale of private placement securities to certain clients. There typically is a minimum investment for these offerings. In this capacity, we work as a selling agent with issuers to sell those offerings to individual investors. Because of the risk associated with private placement investments, we only offer private placement investments to “accredited investors” who have the financial means to afford those risks. Please refer to the offering memorandum for specific limitations.
• We enter into selling agreements with annuity and 529 providers and offer those products. We make recommendations to retail investors who are referred to us by an RIA.

Below is a description of how we serve you as a broker-dealer related to this:

○ We recommend fixed, fixed index, registered index-linked and variable annuities.
○ We recommend 529 plans if this is part of your overall financial plans.
○ Our recommendation is limited to products for which we have a selling agreement.
○ When making recommendations, we consider your investment profile, and we complete the transactions you decide you make. You make the ultimate decision whether to buy or sell any investment.
○ We are not a fiduciary with respect to the recommendations and do not maintain a fiduciary relationship with you.
○ We do not make investment decisions for you or provide ongoing investment advice, monitor your investment, or hold customer accounts or assets.

Conversation Starter: Ask your financial professional

• Given my financial situation, should I choose a brokerage service? Why or why not?
• How will you choose investments to recommend to me?
• What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?
What fees will I pay?

- **Private Placements**: We are paid a commission which is typically calculated as a percentage of the amount you invest. In some cases, we are paid a periodic monitoring fee that is a percentage of your investment and drawn from ongoing cash distributions made by the investment partnership to investors. The specific amount to be paid to us is disclosed in the private placement memorandum (“PPM”) associated with each private placement investment.
  
  - You should carefully review the PPM because it not only discloses our compensation, but it also describes the project being funded by the private placement, how the funds invested will be used, and the risk associated with the investment.
  
  - In some instances, we may be paid a portion of the fees charged by the manager of the project underlying the private placement investment. A description of any such payment to us will be disclosed in the PPM. None of these fees are charged to you.

- **529 Plans**: For some 529 plans, you will pay a commission that is percentage of the amount invested. Some plans impose internal operating fees. You will pay fees and costs to the 529 plan provider if you choose to invest additional monies. We indirectly receive some of these fees and costs at times as payment for our services.

- **Annuities**: For some annuities, you will pay a sales charge that is a percentage of the amount invested. You will also incur additional fees if you select optional features or benefits, and you will pay fees referred to as “surrender” or contingent deferred sales charges if you sell within the stated period of time. There might be other fees that the insurance companies can impose to you.

You will pay fees whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

**Conversation Starter: Ask your financial professional**

- Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

- We are compensated directly by you and/or indirectly from the investments made on your behalf.
- You maybe be charged a commission or sales charge on every transaction. Since we receive compensation on every transaction, we have an incentive to encourage you to purchase more investment products.
- We have arrangements with product sponsors, insurance carriers and/or issuers under which we receive payments based on sales of their products. The fact that we receive compensation from one product sponsor than another creates an incentive for us to recommend certain investments to you or to restrict the investment products that we offer.
- We and our financial professionals receive payments from sponsors or insurance carriers of investment products, such as 529 plan providers, annuities and private placement issuers that we use to promote our services, provide information to customer and prospective customers, and pay for expenses that we incur in seeking or retaining customers.
- Both our financial professionals and our firm receive a portion of the compensation that you pay to the third-party product provider. The type and amount of compensation varies by product type (mutual funds, annuities, etc.), by the size of the investment, and by the services provided. Compensation for financial professional usually includes:
  - Up-front or deferred commissions, sales charges or placement fees.
  - Ongoing compensation for products, such as the 529 plans mutual funds (12b-1 fees) and annuities.
How do you your financial professionals make money?

- Our annuity directors are registered financial professionals who facilitate the purchase of insurance carrier products. They are compensated with a base salary and a commission from the sale of the annuity.
- The financial professionals that offer 529 plans are being compensated through the purchase of new investments. They will also receive a portion of the ongoing fees that we receive from sponsors of those investments (12b-1 fees for mutual funds).
- For private placements, the financial professional receives commissions for the execution of sales in privately offered securities based on the structure laid out in the PPM. The compensation structure for every offering may be different.

Do you or your financial professionals have legal or disciplinary history?

- Yes. You may research the firm or your financial professional’s history at the SEC at https://www.investor.gov/CRS or FINRA at https://brokercheck.finra.org/

Additional Information

- For additional information about our services, visit https://www.haloinvesting.com

Conversation starter: Ask your financial professional

- As a financial professional, do you have any disciplinary history. For what type of conduct?

Conversation starter: Ask your financial professional

- Who is my primary contact person?
- Is he or she a representative of an investment adviser or a broker dealer?
- Who can I talk to if I have concerns about how this person is treating me?