



**Item 1: Introduction:** SuperVision Partners LLC (“SuperVision”, “we” or the “Firm”) is a New York LLC that is a broker-dealer registered with the Securities and Exchange Commission (“SEC”), a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). The Firm is not an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for retail investors to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

**Item 2: Relationships and Services:** *What investment services and advice can you provide me?* We offer private placement brokerage services to individuals, trusts, pension plans, endowments, family offices and other experienced and qualified investors, including *retail investors*. We do not offer investment advisory services. Our services relate solely to the private placement of securities, including limited partnership and limited liability company interests, as well as other privately offered securities. We **do not** i) maintain brokerage accounts, ii) act as an investment adviser, iii) monitor investments, or iv) accept discretionary authority. Generally, we act solely as a finder, where we simply introduce qualified investors to appropriate investment opportunities without making a recommendation to invest. However, on some occasions, we **do** offer recommendations. When we make recommendations, Regulation BI requires us to do so solely in our client’s best interest. In either case, you will make the ultimate decision whether to invest, and you will be responsible for monitoring your investments after they are made. You should consult with your tax, legal and investment advisers in doing so. As a client of SuperVision, you must meet the minimum investment standards of the privately offered securities. We offer non-proprietary products, however we may have business relationships with the issuers of the recommended securities, as discussed in more detail below.

**Additional Information:** SuperVision is wholly owned by Compliance First LLC, a New York LLC (“Compliance First”). Compliance First is owned equally by Gregory Florio and James Leahy. Mr. Florio and Mr. Leahy are investment management attorneys and compliance consultants with over fifty years of cumulative experience. SuperVision is in the Orical Group of Companies, which also includes Orical LLC, an investment management compliance consulting firm (“Orical”), Florio Leahy LLP, an investment management law firm (“FL”) and Real World Compliance LLC, a compliance technology firm (“Real”) (collectively, the “Orical Group”). All companies in the Orical Group are under 100% common ownership and controlled by Mr. Florio and Mr. Leahy. SuperVision was formed on November 25, 2015 and its broker-dealer registration was made effective by the SEC on June 17, 2020. Private placements involve significant risks including total loss of principal. They are illiquid investments. Privately offered securities are not registered, and therefore, there is very little verifiable information available, which will hinder your and our due diligence efforts. In many instances, we and you may only be able to rely on information supplied by others, and therefore, the possibility of fraud or misleading statements being relied upon is great. In many instances, we may not be able to verify that the assets a private issuer says it owns actually exist, or that such assets are free and clear of any and all liens and are otherwise unencumbered. Such verification should be part of your due diligence. You should only invest if you are a sophisticated investor capable of evaluating the risk associated with your investments, and have in fact done so, and you are willing and able to bear the risk of i) the total loss of your investment, including the principal invested, and/or ii) not being able to liquidate the investments at a time of your choosing.

**Conversation Starter:** 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?

**Item 3: Fees, Costs, Conflicts, and Standard of Conduct:** *What fees will I pay?* The investments we introduce to you will charge you fees and expenses. Information regarding those fees and expenses will be made available to you by the companies you are considering for investment or their affiliates (your “Portfolio Companies”). Expenses and fees are determined by your agreement with the Portfolio Companies. Fees are typically determined as a percentage of what you invest or a share of the profits your investment generates. Fees and expenses will reduce your invested capital and any amount of money you make on your investments over time. You will pay fees and costs whether you make or lose money on your investments. Please make sure you review and understand what fees and costs you are paying. A summary of the principal fees and costs that can be incurred, include but are not limited to, management fees, transaction-based fees, other transactional fees and/or product level fees (“Fees”). Fees are assessed periodically. Fees can create a conflict of interest and incentivize us and/or the Portfolio Company to encourage you to increase your investment so we can receive greater Fees from you. As stated above, SuperVision does not maintain customer accounts and therefore does not receive transaction-based fee compensation.



Conversation Starter: 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? **If we provide you with a recommendation**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations we provide you. Below are some examples to help you understand what this means.

**Below is a list of some material conflicts of interest associated with SuperVision’s business; it is impossible to disclose all material conflicts of interest as they may change over time and with each potential investment. You should discuss the specific conflicts of interest associated with a particular investment with a Registered Representative of SuperVision.**

How do your financial professionals make money? **How we make money:** SuperVision and its Registered Representatives are compensated by you indirectly. We are commonly compensated by receiving either a portion of the fees that you pay to your Portfolio Companies (“Fee Sharing”) or by receiving a fee from the Portfolio Companies equal to a percentage of what you invest (“Commission”). Under Fee Sharing arrangements, SuperVision may receive 20% or more of the fees you pay to your Portfolio Companies. Under Commission arrangements, SuperVision may receive amounts equal to between 5% and 10% of the amount you invest. SuperVision may also be granted equity interest, or other interest in the Portfolio Companies you invest in in return for the introduction of you to Portfolio Companies. Fee Sharing arrangements will not increase the fees you pay to Portfolio Companies. However, Commissions may be charged to you or be deducted from your invested amount unless otherwise disclosed to you in writing.

Additional Information: You will pay fees and costs 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.

Our Relationship with Your Portfolio Companies: In some cases, Portfolio Companies will be clients of Orical, FL and/or Real (“Orical Clients”). Therefore, affiliates of SuperVision will receive fees for legal, compliance and/or technology services provided to such Portfolio Companies. Such relationships will incentivize us to introduce you to, or recommend, investments in such Portfolio Companies.

Restrictions on what we can tell you about Portfolio Companies: We owe a duty of confidentiality to Portfolio Companies that are Orical Clients, and therefore, we may not be able to share with you, confidential information regarding such Portfolio Companies, even if such information is materially adverse to the value of your investment. SuperVision has adopted Written Supervisory Procedures designed to ensure that introductions and recommendations are made only to Portfolio Companies that are suitable for you and that no conflict of interest prevents us from doing so.

Conversation Starter: How might your conflicts of interest affect me, and how will you address them?

**Item 4: Disciplinary History:** Do you or your financial professionals have legal or disciplinary history? Yes. Please visit [Investor.gov/CRS](https://investor.gov/CRS) for a free tool to research the Firm and our financial professionals.

Conversation Starter: As a financial professional, do you have any disciplinary history? For what type of conduct?

**Item 5: Additional Information:** You can find additional information about our services by contacting our Firm’s main office line at (212) 257-5790. Additionally, you may request up-to-date information and a copy of the most current version of this relationship summary by emailing Gregory Florio, our Chief Compliance Officer, at [gflorio@supervisionpartners.com](mailto:gflorio@supervisionpartners.com). Current versions of this form are available on the firm’s website, <https://supervisionpartners.com> and filed with FINRA upon update.

Conversation Starter: 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?