



THIRD-PARTY FEE DISCLOSURE

Sorrento Pacific Financial, LLC ("SPF"), receives compensation and/or fees (also referred to as revenue sharing) from certain mutual fund families, insurance (fixed and variable product) providers and alternative investment (REIT/BDC/etc.) providers that sponsor, manage and/or promote the sale of certain products that are available to our customers. These payments include commissions, trailing commissions, fees and for certain product providers, revenue sharing payments made in connection with programs that support our marketing and sales force education and training efforts (referred to here as "Strategic Partners Program"). These relationships bring additional compensation to SPF, which is used to offset a variety of expenses, including but not limited to, marketing, training, educational presentations and other support. This additional compensation may create a potential conflict of interest as it may influence the selection of investments SPF and/or its Investment Representatives offer or recommend to investors. This disclosure is intended to provide you with an overview of the various types of compensation and/or fees SPF may receive. We encourage you to review this information in the entirety and contact us with any questions.

STRATEGIC PARTNERS PROGRAM

Strategic Partner Program participants (referred to as "Participating Sponsors" or "Strategic Partners") are listed below. Participating Sponsors pay SPF different amounts of revenue sharing and receive different levels of benefits for such payments. Some Participating Sponsors pay SPF more than others, however, those fees are not shared with Investment Representatives. An Investment Representative's compensation is the same regardless of whether the sale involves a Strategic Partner's product. In some cases, Participating Sponsors may pay additional marketing payments to SPF to cover fees to attend conferences or reimbursement of expenses for workshops or seminars. The payments made under the Strategic Partners Program are calculated based upon gross sales or assets under management and vary by product provider. SPF receives sales based revenue sharing only on commission-based business. Participating Sponsors may receive benefits such as Investment Representative contact lists, preferred placement on SPF's website, SPF support of product training and ability to participate in SPF's annual conference.



Mutual Fund Participating Sponsors

In addition to receiving sales commissions and other types of compensation, SPF receives asset-based and/or sales-based compensation from mutual fund Participating Sponsors. Such payments vary by mutual fund sponsor. SPF may receive payments from mutual fund sponsors under the Strategic Partners Program of up to 0.25% annually on sales. This compensation is not shared with Investment Representatives.

The following is a list of mutual fund sponsors that participate in SPF's Strategic Partners Program:

Franklin Templeton

Pacific Life

Transamerica

This list is subject to change.

Variable Annuity Participating Sponsors

In addition to receiving commissions, SPF receives sales-based compensation from variable annuity Participating Sponsors. SPF receives compensation on an annual basis of up to 0.25% on sales of variable annuity products. This compensation is not shared with Investment Representatives.

The following is a list of variable annuity sponsors that participate in SPF's Strategic Partners Program:

Allianz

AIG f/k/a SunAmerica

AXA

Brighthouse

Delaware Life

Global Atlantic f/k/a Forethought

Great American Life

GreatWest Life

Jackson National

Lincoln Financial

Mass Mutual

Nationwide

New York Life

Pacific Life

Protective Life

Prudential



Sammons/Midland
Transamerica

This list is subject to change.

Mutual Fund Retirement Platform Participating Sponsors

In addition to receiving commissions, SPF receives payments from sponsors of mutual fund retirement platforms. SPF receives compensation on an annual basis of up to 0.15% on sales or 0.04% on customer assets of mutual funds within these platforms. This compensation is not shared with Investment Representatives.

The following is a list of mutual fund retirement platforms sponsors that participate in SPF's Strategic Partners Program:

Sammons
Voya Financial

This list is subject to change.

Fixed Annuity and Fixed Index Annuity Participating Sponsors

In addition to receiving commissions, SPF receives payments from fixed and fixed index annuity Participating Sponsors. SPF receives compensation on an annual basis of up to 0.25% on sales of fixed annuity and fixed index annuity products. This compensation is not shared with Investment Representatives.

The following is a list of fixed annuity and fixed index annuity sponsors that participate in SPF's Strategic Partners Program:

Brighthouse Financial f/k/a MetLife
Global Atlantic f/k/a Forethought
Great American
Great West
Jackson National
Midland National
Nationwide
New York Life
One America
Pacific Life
Principal
Protective Life
Symetra
Western & Southern



This list is subject to change.

Alternative Investment Participating Sponsors

In addition to receiving commissions, SPF receives payments of up to 1.00% of sales on customer assets invested in alternative investment products, including but not limited to real estate investment trusts, business development companies and other '40 Act funds. This compensation is not shared with Investment Representatives.

The following alternative investment sponsors participate in SPF's Strategic Partners Program:

CIM f/k/a Cole Capital
Griffin Capital
Hines Securities

This list is subject to change.

THIRD-PARTY INVESTMENT ADVISORS

SPF receives compensation from certain Third-Party Advisors to assist in paying for ongoing marketing and sales support activities including, but not limited to, training, educational meetings, due diligence reviews, and day-to-day marketing and/or promotional activities. Not all Third Party Advisors pay such compensation. Participating Third Party Advisors may change over time. Current participating Third-Party Advisors are:

AssetMark
Morningstar
SEI

This list is subject to change.

The compensation arrangements vary, and may generally be structured as follows:

- A stated percentage of gross sales up to .05% of net sales with the Third-Party Advisor.
- A stated percentage of assets under management up to .03% of assets under management with the Third Party Advisor.
- A minimum flat fee, fixed payment up to \$60,000.
- A combination of the above.



A potential conflict of interest may exist where SPF receives such compensation because there may be an incentive to recommend these Third Party Advisors over other investment opportunities in order to generate additional revenue for the firm. However, our Investment Advisor Representatives are not required to recommend any Third Party Advisor providing additional compensation, nor do they directly share in any of this compensation.

OTHER COMPENSATION

SPF Investment Representatives may receive additional compensation from product sponsors however, such compensation is not tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives, including services for identifying prospects.

Product sponsors may also pay for, or reimburse SPF, for the costs associated with education or training events that may be attended by SPF advisors and for SPF-sponsored conferences and events.

PERSHING AND QUASAR CLEARING RELATIONSHIPS

Pershing and Quasar are the clearing firms for SPF's brokerage business. Due to this business relationship, Pershing and Quasar may share with SPF a portion of the commissions and fees you may pay to Pershing or Quasar. The following is a brief description of some of the revenue items received from Pershing.

Pershing receives revenue from money market funds and deposit sweeps, and shares that revenue with SPF for money market funds/deposit sweeps made available to you for cash sweeps in your brokerage account. SPF Representatives do not receive any part of this revenue.

Pershing receives shareholder servicing fees from certain mutual fund sponsors as part of their FundVest NTF (No Transaction Fee) program, shares a portion of these fees with SPF and does not charge SPF a ticket charge. SPF Investment Representatives do not receive any part of this revenue.

Pershing charges brokerage fees including account transfer fees, IRA custodial and termination fees, paper confirm statement fees, and inactive (custodial) account fees. Portions of these fees may be shared with SPF. Representatives do not receive any part of the revenue generated by these fees.

Quasar receives service fees from mutual fund companies and shares some of



these fees with SPF. Representatives do not receive any part of the revenue generated by these fees.

CASH SWEEP & MONEY MARKET SWEEP

SPF offers the Dreyfus insured deposit program through Pershing, LLC (“Pershing”). The Dreyfus Insured Deposit Program is a bank deposit “sweep” program that can provide daily interest income and FDIC insurance on balances up to \$2.5 million.

SPF receives compensation from Pershing through the DIDP equal to a percentage of the average daily deposit balance. For additional information on the DIDP, please see the DIDP disclosure booklet available from your Investment Representative. This compensation is retained by SPF and is not shared with Investment Representatives.

The DIDP program provides FDIC insurance and payment rates based on the interest rate environment as well as based on total account balance. For accounts not eligible for the DIDP, cash balances are invested in a money market fund. The money market mutual fund automatic cash sweep program sweeps uninvested cash daily into taxable or tax-exempt money market funds offered by The Dreyfus Corporation and other investment managers. SPF may receive compensation of up to 0.60% of the assets invested in The Dreyfus Corporation money market funds. This compensation is retained by SPF and is not shared with Investment Representatives.

INSURANCE MARKETING ORGANIZATIONS

SPF receives compensation from Insurance Marketing Organizations (“IMOs”) based on sales of insurance products from product providers represented by the IMOs, that assists representatives with life insurance and fixed annuity products. This compensation to SPF is used to offset a variety of expenses, including but not limited to, marketing, training, educational presentations and other support. This compensation is not shared with Investment Representatives.

OTHER FEE DISCLOSURES

Other fee disclosures related to our investment advisory business can be found in SPF’s Form ADV, available at <http://www.spfdisclosure.com>.