

PART 2B OF FORM ADV
BROCHURE SUPPLEMENT
December, 31 2025

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Twin Focus Capital Partners, LLC

This Brochure supplement provides information about the financial professionals listed above that supplements the TwinFocus Capital Partners, LLC (“TwinFocus”) Form ADV Part 2A, the Brochure. Please contact John Pantekidis, Chief Compliance Officer if you did not receive the TwinFocus Brochure or if you have any questions about the contents of this Supplement. Additional information about the financial professionals listed above is available on the SEC’s website at www.adviserinfo.sec.gov.

www.twinfocus.com
| 617-720-4500

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Wesley Karger, CFA®*Co-Founder & Managing Partner*

Education:

- Boston University | B.A., Economics (*Cum Laude*) | 2000

Recent Business Background:

- Twin Focus Capital Partners, LLC | Managing Partner | June 2006 – Present
- UBS Financial Services Inc. | Financial Advisor | September 2003 – June 2006
- State Street Bank | Analyst | February 2000 – August 2003

Professional Designations:

- CFA®

Born:

- 1977

Contact Information:

- Phone: 617-720-4512
- Email: wk@twinfocus.com

Paul Karger, CFA®

Co-Founder & Managing Partner

Education:

- Boston University | B.S., Manufacturing | 2000

Recent Business Background:

- Twin Focus Capital Partners, LLC | Managing Partner | June 2006 – Present
- UBS Financial Services Inc. | Vice President | September 1999 – June 2006

Professional Designations:

- CFA®, CIMA®

Born:

- 1977

Contact Information:

- Phone: 617-720-4515
- Email: pk@twinfocus.com

John Pantekidis, JD, CFA®

Managing Partner, Chief Investment Officer, Chief Compliance Officer & General Counsel

Education:

- Boston University | LL.M., Law | 1994
- Boston University | JD., Law | 1993
- Boston University | B.A., Economics | 1990

Recent Business Background:

- Twin Focus Capital Partners, LLC | Partner, CIO & General Counsel | January 2007 – Present
- A.G. Edwards & Sons, Inc. | Financial Consultant | November 2003 – December 2006

Professional Designations

- CFA®

Born:

- 1967

Contact Information:

- Phone: 617-720-4517
- Email: jp@twinfocus.com

Laurence J.S. Grosbaum, CPA, CFA®

Partner & Managing Director, Portfolio Management, Analytics and Reporting

Education:

- State University of New York at Buffalo | B.S., Business Administration | 1991

Recent Business Background:

- Twin Focus Capital Partners, LLC | Managing Director, Portfolio Management, Analytics, and Reporting | June 2010 – Present
- Reed & Associates, CPAs | Senior Manager | February 2010 – June 2010
- State Street Corporation | Vice President | September 2006 – December 2008
- Grant Thornton | Senior Manager | January 2006 – September 2006

Professional Designations:

- CPA
- CFA®

Born:

- 1969

Contact Information:

- Phone: 617-720-4525
- Email: laurence.grosbaum@twinfocus.com

Jeffrey Heisler, PhD, CFA®

Partner & Managing Director, Investment Research

Education:

- New York University | PhD, Finance | 1995
- University of Chicago | MBA, Finance | 1986
- Union College | B.S., Mechanical Engineering | 1981

Recent Business Background:

- Twin Focus Capital Partners, LLC | Managing Director, Investment Research | March 2014 – Present
- The Colony Group | Market Strategist | February 2011 – February 2014
- Venus Capital Management | Chief Risk Officer | May 2009 – February 2011

Professional Designations:

- CFA®

Born:

- 1959

Contact Information:

- Phone: 617-720-4534
- Email: jeffrey.heisler@twinfocus.com

David A. Daglio, CFA[®], MBA*Global Investment Strategist***Education:**

- Rensselaer BS Mechanical Engineer. 1988
- NYU Stern School of Business, MBA 1996

Recent Business Background:

- BC-GUMPS | CEO and Founder | June 2022 – present
- Personal Sabbatical | January 2020 – June 2022
- BNY Mellon | CIO | January 1998 - January 2020.

Professional Designations:

- CFA[®]

Born:

- 1966

Contact Information:

- Phone: 617-720-4528
- Email: david.daglio@twinfoocus.com

Professional Designations

This Summary of Professional Designations is provided to assist you in evaluating the professional designations and minimum requirements of our investment professionals who hold these designations.

CFP®: CERTIFIED FINANCIAL PLANNER™

A CERTIFIED FINANCIAL PLANNER™ is a professional designation issued by the Certified Financial Planner Board of Standards, Inc. Candidates for the CFP® designation are tested on over 100 topics in the following areas: financial planning, insurance, investment planning and retirement and estate planning. A CERTIFIED FINANCIAL PLANNER™ is qualified to give financial advice and make financial decisions for individuals seeking their expertise. A CERTIFIED FINANCIAL PLANNER™ must participate in continuing education, including ethics training, to maintain his or her certification.

CPA: Certified Public Accountant

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services.

CFA: Chartered Financial Analyst

The CFA® charter is a credential awarded by the CFA Institute to individuals who meet its education, examination, sponsorship, experience and ethics requirements. To earn a CFA® charter, eligible candidates must have four years of qualified investment work experience, become a member of the CFA Institute, adhere to the Code of Ethics and Standards of Professional Conduct on an ongoing basis, and complete the CFA® program, which requires the passage of three separate six-hour examinations. Topics tested by the CFA Institute include ethical standards, quantitative methods, economics, financial reporting, corporate finance, equities, fixed income, derivatives, alternative investments, and portfolio management.

CAIA: Chartered Alternative Investment Analyst

The Chartered Alternative Investment Analyst (CAIA®) designation is awarded by the CAIA Association to investment professionals who demonstrate expertise in alternative investments. To earn the CAIA designation, candidates must complete a two-level examination program that covers topics such as hedge funds, private equity, real assets, structured products, derivatives, portfolio management, and risk management. Candidates must also meet professional experience requirements and agree to adhere to the CAIA Association's Member Agreement and Professional Conduct Statement. CAIA charterholders are required to maintain membership in the CAIA Association and comply with ongoing ethical and professional standards.

Certified Investment Management Analyst® (CIMA®)

The CIMA certification, administered through Investment Management Consultants Association (IMCA), signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass a Qualification Examination, successfully complete a one-week classroom education program, pass a Certification Examination, and have an acceptable regulatory history. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification.

Series 65 License:

Series 65 is a securities license issued by the North American Securities Administrators Association (NASAA) that is administered by FINRA, which allows individuals to serve as investment advisors. Candidates who passed the Series 65 exam were tested on the following areas: laws, regulations, ethics, and investment products.

Series 66 License:

Series 66 is a securities license issued by the North American Securities Administrators Association (NASAA) that allows an individual the right to register as an investment advisor representative and/or securities agent. Candidates who pass the Series 66 exam also meet the requirements of the Series 63 and 65 exams.

Item 3. Disciplinary Information

TwinFocus is required to disclose information regarding any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised persons identified at Item 2. TwinFocus has no information to disclose in response to this Item.

Item 4. Other Business Activities

Paul Karger serves as a member of the Board of Directors of MPM Asset Management LLC, a venture capital investment management firm. In connection with this role, Mr. Karger receives compensation of approximately \$25,000 per year. MPM Asset Management LLC was founded by a TwinFocus client, and certain TwinFocus clients are investors in investment funds managed by MPM Asset Management LLC. Mr. Karger's service on the board creates a potential conflict of interest because he receives compensation from an organization whose investment funds may be held in client portfolios. TwinFocus has adopted policies designed to address this potential conflict, including requiring Mr. Karger to recuse himself from decisions relating to investments in MPM Asset Management LLC funds where appropriate.

Item 5. Additional Compensation

TwinFocus is required to disclose information regarding any arrangement under which the supervised persons identified at Item 2 receive an economic benefit from someone other than a client for providing investment advisory services. The supervised persons discussed herein generally receive compensation solely in connection with investment advisory services they provide to advisory clients, including private funds sponsored by TwinFocus or an affiliate, except as disclosed above under Item 4. **Item 6. Supervision**

The supervised persons identified above are supervised by the firm's principals, including Wesley Karger and Paul Karger. The firm's principals supervise one another through ongoing oversight, trade supervision, compliance monitoring, periodic performance evaluations, staff meetings, and direct communication.