

Eolas Capital LLC



10 Post Office Square, Suite 1102

Boston, MA 02109

(617) 468-4128

May 24, 2022

FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Eolas Capital LLC ("Eolas Capital"). If you have any questions about the contents of this brochure, please contact us at (617) 468-4128 or by email at des.macintyre@eolascapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC"), or by any state securities authority.

Registration with the SEC or with any state securities authority does not imply a certain level of skill or training.

Additional information about Eolas Capital LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Summary of Material Changes

The last update of this Brochure was October 8, 2021. Since the last brochure update, there have been no material changes, other than the following:

- Item 4 - Updates to the descriptions of Eolas Capital investment advisory services, including its proposed management of private collective investment funds currently in formation.
- Item 5 - Updates to the descriptions of Eolas Capital's fees relating to its proposed services, including those services as an investment manager to private collective investment funds currently in formation.
- Item 6 - Adds descriptions of Eolas Capital's proposed incentive fees and distributions and performance allocations relating to its services as an investment manager to private collective investment funds currently in formation or its proposed services, or the proposed services of one or more affiliates, as the general partner to private collective investment funds currently in formation.
- Item 10 - Adds descriptions of Eolas Securities, LLC, and certain general partners to private collective investment funds currently in formation whose assets Eolas Capital proposes to manage.

This Brochure, also known as Form ADV, Part 2A, has been prepared according to the state of Massachusetts and SEC rules relating to information that must be disclosed to clients and prospective clients of certain investment advisers, which includes Eolas Capital.

You may request a copy of the most recent version of this Brochure free of charge by contacting us at (617) 468-4128 or by email at des.macintyre@eolascapital.com. If you are a client of Eolas Capital, you will receive an updated Brochure (or a summary of any material changes since the Brochure's last annual update and information on how to request an updated Brochure) within 120 days of the close of Eolas Capital's fiscal year. Eolas Capital's fiscal year closes on June 30, which means that you usually will receive an updated Brochure or the summary of material changes by September 30 of the year. From time to time, we also may provide you with information that, as a client, could affect our advisory relationship with you.

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Item 4 - Advisory Business

Firm Description

Eolas Capital is a diversified global asset management firm. The firm focuses on providing investment advisory and other, non-investment advisory services to boutique asset and wealth managers in the United States and global asset managers seeking to expand into the US market (“Partner Managers”).

Ownership & Locations

Eolas Capital was founded in March 2021 and commenced operations in October 2021. The firm’s principal owners are Des Mac Intyre and with a significant minority shareholding held by Channel Capital Pty Ltd (“Channel Capital”), Sydney, Australia. Eolas Capital is headquartered in Boston, Massachusetts, USA.

Channel Capital is dedicated to partnering with, as well as building and supporting, a portfolio of Australian and non-Australian institutional investment managers. Channel Capital provides a range of services to those institutional investment managers, including working capital, trading and operational support, and solicitation services.

Description of Investment Advisory Services

Eolas Capital’s advisory services complement Channel Capital’s business by providing the following investment advisory and advisory-related services:

- Soliciting institutional investors on behalf of the Partner Managers subject to the terms and conditions of a solicitation agreement between Eolas Capital and the Partner Managers. These services are tailored to the needs of the institutional investors, with specific terms typically reflected in an investment management agreement between the institutional investor and a Partner Manager.
- Providing discretionary investment advisory services to certain onshore and offshore private collective investment funds (“Private Funds”) in which an Eolas Capital affiliate serves as the general partner (or in a similar capacity) and a Partner Manager serves as the investment sub-adviser. Each Private Fund will pursue an investment objective and strategy that corresponds to an investment strategy of a Partner Manager. These services are not typically tailored to the needs of individual Private Fund investors although Eolas Capital or an affiliate may enter into a “side letter” with a specific institutional investor, which may provide the investor with alternative fee, information and other rights as a Private Fund interest holder.

As of the date of this brochure, Eolas Capital had entered into a solicitation agreement with each of two Partner Managers and is forming two Private Funds.

Assets Under Management

As of the date of this brochure, Eolas Capital did not manage any client assets on a continuous basis and did not have any discretionary or non-discretionary assets under management.

Item 5 - Fees and Compensation

Solicitation Fees

Eolas Capital is compensated by Partner Managers for the provision of client-solicitation services by way of a solicitation fee. Typically, the amount of solicitation fees received by Eolas Capital from any one Partner Manager is equal to an amount between 25 percent and 40 percent of the Partner Manager's gross investment management fees attributable to Eolas Capital-solicited clients. Eolas Capital-solicited clients are not assessed any fee for having been solicited by Eolas Capital on behalf of a Partner Manager. Solicitation fee rates and terms are negotiable with the Partner Manager.

The Partner Manager will provide reports to Eolas Capital, which will be used to calculate the fee. Eolas Capital will invoice the Partner Managers quarterly in arrears. Fees may be remitted by wire or check.

Upon request to terminate the solicitation agreement, Eolas Capital would terminate all solicitation activities. In accordance with the solicitation agreement, Eolas Capital shall collect fees in perpetuity on business they had solicited for the agreed term.

Private Funds

Eolas Capital receives a management fee for providing investment management services to Private Funds. Investment management fee rates charged by Eolas Capital are typically between 1 percent and 2 percent per annum of Private Fund net assets, calculated monthly and paid monthly in advance. Management fees received by Eolas Capital are used to pay the management fees of Partner Managers serving as sub-advisers to Eolas Capital. An affiliate of Eolas Capital which serves as the general partner (or in a comparable capacity) of a Private Fund also may receive performance allocations, incentive fees and carried interest. Partner Managers serving as sub-advisers to Eolas Capital also may receive a portion of any performance allocations, incentive fees or carried interest received by Eolas Capital or its affiliates. See Item 6 - Performance-Based Fees and Side-by-Side Management.

Fees and Client Expenses, Generally

All fees are agreed to prior to executing an investment management or advisory agreement with a Partner Manager and/or a Private Fund. Investment management agreements with Private Funds provide that the Private Fund's general partner may terminate such agreement prior to any subsequent increase in fees taking effect or on 60 days' prior written notice.

All investment management fees charged by Eolas Capital are exclusive of brokerage commissions, custody fees, transaction fees, and other related costs and expenses, which shall be the responsibility of the Private Fund. A Private Fund and its investors will incur various expenses

in addition to any management fees, incentive fees, performance allocations and carried interest, which are described in the Private Fund's offering documents. Those expenses include fund organizational and initial offering costs, and on-going expenses, such as legal, auditing, fund administration, transfer agency, custody, brokerage, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and transactions.

Item 6 - Performance-Based Fees and Side-By-Side Management

As an investment advisor to Private Funds, Eolas Capital or an affiliate, typically receives incentive-based fees, performance allocations, and carried interest, that is, fees and allocations that are based on a share of a capital gains or capital appreciation of a client's account. Eolas Capital typically shares with a Partner Manager a portion of those incentive-based fees and distributions and performance allocations that it receives.

Private Funds also may be managed side-by-side with private collective investment funds managed and sponsored by Channel Capital and sub-advised by a Partner Manager, or by a Partner Manager directly. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

A Partner Manager that manages a Private Fund concurrently with a private collective investment fund managed or sponsored by Channel Capital, a separately managed account or a private collective investment fund sponsored by the Partner Manager has an incentive to favor those funds and accounts for which it receives incentive-based fees and distributions and performance allocations. To address those conflicts of interest, investors eligible to invest in a private collective investment fund managed or sponsored by Channel Capital or a Partner Manager are not eligible to invest in a Private Fund.

Item 7 - Types of Clients

Eolas Capital clients are primarily Private Funds. Eolas Capital also solicits institutional investors on behalf of its Partner Managers. Eolas Capital does not solicit or provide investment advice to retail investors (that is, individuals and their legal representatives).

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

Eolas Capital performs due diligence on potential Partner Managers prior to establishing a business relationship and/or a solicitation agreement. The due diligence process includes review of the following information, which is either publicly available or provided by the Partner Managers:

- Government records (e.g., Form ADV when available) and other regulatory filings;
- Business profile, including AUM and key investment strategies;
- Meetings with key personnel, including officers and portfolio manager;
- Marketing and other materials describing the Partner Manager's investment philosophy; process and performance (including peer rankings where appropriate
- Financial data.

In soliciting institutional investors, Eolas Capital is mindful of its Partner Manager's capabilities and attempts to match those capabilities to the requirements of institutional investors.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear.

Descriptions of the principal investment risks associated with the Private Funds are described in the Private Fund offering documents. Descriptions of the principal risks associated with the investment strategies associated with the Partner Manager strategies are provided by the Partner Manager.

Eolas Capital does not represent or guarantee that the services or methods of analysis of a Partner Manager can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Eolas Capital cannot offer any guarantees or promises that an investor's financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Item 9 - Disciplinary Information

Eolas Capital is required to disclose the facts of any legal or disciplinary events that are material to a Client's evaluation of its advisory business or the integrity of its management. Eolas Capital does not have any required disclosures under this item.

Item 10 - Other Financial Industry Activities and Affiliations

Other Businesses of Eolas Capital

Eolas Capital may take an economic interest in its Partner Managers by providing working capital, for which it receives a revenue share as compensation. Eolas Capital may offer to facilitate, on behalf of its Partner Managers, a range of operational support services using a choice-set approach. Eolas Capital provides or facilitates such services on a negotiated basis. The receipt of compensation for these services, may create a potential conflict of interest for Eolas Capital when the firm has provided working capital and is also acting as the solicitation agent for the Partner Manager. Eolas Capital manages this potential conflict by ensuring that the revenue share percentage is adjusted, and is reflective, of any compensation received under the terms of a solicitation agreement.

Material Relationships or Arrangements with Industry Participants

Eolas Securities LLC, a wholly owned subsidiary of Eolas Capital ("Eolas Securities"), is a member of INTE Securities LLC, a broker-dealer based in Boca Raton, Florida and registered with the SEC and a member of FINRA ("INTE Securities"). Neither Eolas Securities nor Eolas Capital nor Channel Capital controls INTE Securities.

Eolas Securities, through INTE Securities, provides placement agent services to Private Funds and private collective investment funds managed or sponsored by Channel Capital and/or Partner Managers. Certain employees of Eolas Capital who also are affiliated with Eolas Securities are

registered representatives of INTE Securities LLC, and they may receive transaction-based compensation in connection with these placement agent services.

Eolas Capital believes that the placement agent services provided by Eolas Securities/INTE Securities are complementary to Eolas Capital's solicitation services. Notwithstanding the complementary nature of the services, Eolas Capital may, from time to time have a financial incentive to recommend to an investor that it enter into a separately managed account with a Partner Manager rather than purchase the interests of a Private Fund to which Eolas Securities serves as placement agent, and vice versa.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Eolas Capital has adopted a Code of Ethics (the "Code") that establishes the standard of business conduct that all supervised persons of Eolas Capital must follow. Under the Code, Eolas Capital's supervised persons must, among other obligations, act consistently with Eolas Capital's fiduciary duties to its Clients. In addition, all of Eolas Capital's personnel are required to comply with applicable federal securities laws.

Clients or prospective clients may obtain a copy of the Code by contacting Eolas Capital. The Code covers an array of policies relating to:

- Fiduciary Duty Standards
- Code of Ethics Compliance and Administration
- Guidelines for Professional Standards
- Identification and Resolution of Certain Conflicts of Interests
- Personal Trading Policies
- Sanctions and Reporting Violations
- Insider Trading Policies
- Gifts and Entertainment
- Advisory Services to Government Entities (Pay-To-Play)

New employees are required to acknowledge at the time of hiring and annually thereafter their understanding and commitment to said policies and procedures. Employees who fail to comply with the requirements of the Code, and the related policies and procedures, may be subject to disciplinary actions, up to and including termination of employment and/or personal liability, as permitted by law.

The Code also sets forth the standard of ethical and professional business conduct policies and procedures with respect to the fiduciary obligations for certain directors, officers and employees of Eolas Capital (each, an "Associated Person") and addressing potential conflict of interest. As Eolas Capital becomes aware of any potential or actual conflicts of interest, such conflicts will be resolved on a case-by-case basis considering the interests of its Clients in accordance with the policies of the Code, other Eolas Capital's compliance policies and procedures and applicable regulations. To mitigate and resolve such conflicts the Code' requires reporting of potential conflicts of interests by Associated Persons to the Chief Compliance Officer, preclearance of certain personal investment transactions by the Chief Compliance Officer, restrictions placed on

Associated Persons on the acceptance and provision of gifts and entertainment, a review of potential conflicts associated with Eolas Capital's affiliate Channel Capital, service providers, Partner Managers, government officials and approval of outside business activities that may conflict with Eolas Capital's business activities and its Client's interests.

Furthermore, Associated Persons are required to initially and annually complete and deliver to the Chief Compliance Officer an "Associated Person Conflicts of Interest Questionnaire" as set forth in the Code. If the Chief Compliance Officer identifies one or more potential conflicts of interest, the Chief Compliance Officer will conduct a further review for possible mitigation, approval, and other resolutions including eliminating the conflict where necessary.

Item 12 - Brokerage Practices

Eolas Capital does not engage broker-dealers or custodians to execute or trades for any client account. Partner Managers are responsible for selecting all broker-dealers (including Private Fund prime brokers) and in accordance with their broker/custodian selection processes. Information relating to a Partner Manager's broker/custodian selection process is available from the Partner Manager.

Research and Other Soft Dollar Benefits

Eolas Capital does not participate in soft-dollar arrangements and does not receive benefits or cash compensation from any trading counterparty or broker-dealer.

Brokerage for Client Referrals

Eolas Capital does not receive client referrals from any trading counterparty or broker-dealer in exchange for cash or other compensation, such as brokerage services or research.

Aggregated Trading and Directed Brokerage

Eolas Capital does not execute trades and, therefore, does not aggregate trades or have any directed brokerage arrangements.

Item 13 - Review of Accounts

Eolas Capital provides periodic review of all Partner Managers similar to the onboarding due diligence described in Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss. This review process also includes a review of those Partner Managers serving as sub-advisers to a Private Fund.

Item 14 - Client Referrals and Other Compensation

Eolas Capital, as a solicitor, identifies and introduces institutional investors to Partner Managers offering investment management services that meet the institution's needs.

As stated under Item 5: Fees and Compensation, Eolas Capital is compensated for its solicitation services by way of a solicitation fee.

Eolas Capital will work with its Partner Managers to have them amend their Form ADV Part 2 to reflect Eolas Capital's appointment as solicitor and include all required disclosures.

Eolas Capital will distribute a copy of its Form ADV Part 2; the Partner Manager's Form ADV Part 2, its Solicitor's Disclosure Agreement and the state of Massachusetts Table of Fees For Services to each institution prior to solicitation occurring. For reference, the Eolas Capital does not solicit retail investors.

Item 15 - Custody

To comply with state and federal law, each Private Fund, among other things, maintains its assets at a bank or broker-dealer, it prepares audited annual financial statements, and it distributes those statements to Private Fund investors.

Eolas Capital does not have custody of the assets of any other persons.

Item 16 - Investment Discretion

With respect to the Private Funds, Eolas Capital is delegated discretionary management over the Private Fund's assets. However, Eolas Capital sub-delegates all investment discretion over a Private Fund's portfolio to one or more Partner Managers. Eolas Capital currently does not provide discretionary or non-discretionary portfolio management to any other person.

Item 17 - Voting Client Securities

With respect to all securities held by a Private Fund, Eolas Capital delegates all proxy voting to Partner Managers, each of which has its proxy voting policies if required by law, and to vote proxies in accordance with those policies. Eolas Capital currently does not vote any proxies for any other person.

Item 18 - Financial Information

Eolas Capital does not have any financial condition or impairment that would prevent it from meeting its contractual commitments to any client.

Eolas Capital does not take physical custody of client funds or securities, or serve as trustee or signatory for Clients, and it does not require the prepayment of more than \$500 in fees six or more months in advance. Therefore, Eolas Capital is not required to include a financial statement with this brochure.

Eolas Capital has not filed a bankruptcy petition at any time in the past ten years.

Item 19 - Requirements for State Registered Advisors

Refer to the Part(s) 2B for background information about Eolas Capital's principal executive officers, management personnel and those giving advice on behalf of Eolas Capital.

In addition to acting as a solicitor agent for Partner Managers, Eolas Capital may take an economic interest in its Partner Managers by providing working capital, for which it receives a revenue share as compensation. Eolas Capital may offer to facilitate, on behalf of its Partner Managers, a range of operational support services using a choice-set approach. Eolas Capital provides such services on a negotiated or cost pass-through basis. For information on the other business activities and the approximate amount of time advisory representatives spend on that business refer to Item 10 - Other Financial Industry Activities and Affiliations.

Eolas Capital is compensated for advisory services with performance-based fees and other incentive compensation. Refer to the Item 6 - Performance-Based Fees and Side-By-Side Management .

Neither Eolas Capital, nor any of its management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings, or administrative proceedings.

Neither Eolas Capital, nor any of its management persons have a material relationship or arrangement with any issuer of securities.

Item 20 - Additional Information

Class Action Lawsuits

Eolas Capital does not determine if securities held by a client are the subject of a class action lawsuit or whether a client is eligible to participate in class action settlements or litigation, nor does Eolas Capital initiate or participate in litigation to recover damages on a client's behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by a client.

Information on Disciplinary History and Registration

Massachusetts Residents - Pursuant to 950 CMR12.205 (8)(d), the disciplinary history, if any, of all investment advisers and their representatives may be obtained by calling The Massachusetts Securities Division at (617) 727-3548.

James D. Mac Intyre

Eolas Capital LLC

**Ten Post Office Square
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Telephone: 617-468-4128

May 24, 2022

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about James D. Mac Intyre that supplements the Eolas Capital LLC brochure. You should have received a copy of that brochure. Contact us at 617-46-4128 if you did not receive Eolas Capital LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about James D. Mac Intyre (CRD # 4739791) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

James D. Mac Intyre

Year of Birth: 1966

Formal Education After High School:

- University of Exeter (UK), MPHIL Business Studies, 1995
- University College Dublin (Ireland), BA Economics, 1988

Business Background:

- Eolas Capital LLC, Managing Director & Chief Investment Officer/Solicitor, 3/2021 - Present
- INTE Securities LLC, Registered Representative, 3/2022 - Present
- BNY Mellon Investment Management (North America), Chairman & CEO, 7/2017 - 2/2021
- Unemployed, 4/2017 - 7/2017
- Bridgewater Associates, Head of Investment Process Oversight, 3/2016 - 4/2017
- Standish Mellon Asset Management, Chairman & CEO (Various other roles), 1/2005 - 11/2015

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. James D. Mac Intyre has no required disclosures under this item.

Item 4 Other Business Activities

James D. Mac Intyre is a Registered Representative with INTE Securities LLC. INTE Securities LLC is a diversified financial services company engaged in the sale of specialized investment products. While at the present Mr. Mac Intyre is not currently engaged in any business activity, should he proceed with a sale of products he may be entitled to receive compensation from INTE for the sale of securities products.

Eolas Capital is a solicitor only and does not provide portfolio management services and financial advice in this capacity. Therefore, Mr. Mac Intyre would not be making recommendation as an Investment Adviser Representative of Eolas related to securities or insurance products offered by INTE Securities LLC as part of an investment portfolio.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Mac Intyre's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation, Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Eolas Capital LLC's firm brochure for

additional disclosures on this topic.

Item 6 Supervision

Alexander Brian Over, Director & Head of Distribution of Eolas Capital LLC, supervises the activities of James D. Mac Intyre. Alexander Over can be reached at 617-468-4128.

Item 7 Requirements for State Registered Advisers

James D. Mac Intyre does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

Alexander Brian Over

Eolas Capital LLC

**Ten Post Office Square
Suite 1102
Boston, MA 02109**

Telephone: 617-468-4128

May 24, 2021

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Alexander Brian Over that supplements the Eolas Capital LLC brochure. You should have received a copy of that brochure. Contact us at 617-468-4128 if you did not receive Eolas Capital LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Alexander Brian Over (CRD # 5504083) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Alexander Brian Over

Year of Birth: 1960

Formal Education After High School:

- City of London University, Diploma in Accountancy, 1981

Business Background:

- Eolas Capital LLC, Director/ Head of Distribution / Solicitor, 4/2021 - Present
- INTE Securities LLC, Registered Representative, 7/2021 - Present
- BNY Mellon Securities Corporation, Registered Representative, 12/2013 - 3/2021
- Mellon Investments Corporation LLC , EVP, Head of Global Distribution, 1/2021 - 2/2021
- Mellon Investments Corporation LLC, EVP, Head of Global Distribution, 5/2019 - 4/2019
- Mellon Investments Corporation LLC, EVP, Head of Global Distribution, 2/2018 - 4/2019
- Standish Mellon Asset Management LLC, MD, Global Head of Distribution, 2/2008 - 1/2018

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Alexander Brian Over has no required disclosures under this item.

Item 4 Other Business Activities

Alexander Brian Over is a Registered Representative with INTE Securities LLC. INTE Securities LLC is a diversified financial services company engaged in the sale of specialized investment products. While at the present Mr. Over is not currently engaged in any business activity, should he proceed with a sale of products he may be entitled to receive compensation from INTE for the sale of securities products.

Eolas Capital is a solicitor only and does not provide portfolio management services and financial advice in this capacity. Therefore, Mr. Over would not be making recommendation as an Investment Adviser Representative of Eolas related to securities or insurance products offered by INTE Securities LLC as part of an investment portfolio.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Over's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation, Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Eolas Capital LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

James D. Mac Intyre, Managing Director & Chief Investment Officer of Eolas Capital LLC, supervises the activities of Alexander Brian Over. James Mac Intyre can be reached at 617-468-4128.

Item 7 Requirements for State Registered Advisers

Alexander Brian Over does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

Kristen Fontaine

Eolas Capital LLC

**Ten Post Office Square
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Telephone: 617-468-4128

May 24, 2022

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Kristen Fontaine that supplements the Eolas Capital LLC brochure. You should have received a copy of that brochure. Contact us at 617-468-4128 if you did not receive Eolas Capital LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Kristen Fontaine (CRD # 5455706) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Kristen Fontaine

Year of Birth: 1978

Formal Education After High School:

- Assumption University, BA Marketing, 2001

Business Background:

- Eolas Capital LLC, Director, Head of Consultant Relations/Solicitor, 10/2021 - Present
- INTE Securities LLC, Registered Representative, 2/2022 - Present
- BNY Mellon Securities Corporation, Registered Representative, 12/2008 - 10/2021
- Mellon Investments Corporation, Director, Global Consultant Relations, 2/2018 - 9/2021
- The Bank of New York Mellon, Bank Officer , 5/2009 - 9/2021
- Mellon Capital Management, Vice President, Global Consultant Relations, 1/2009 - 1/2018

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Ms. Kristen Fontaine has no required disclosures under this item.

Item 4 Other Business Activities

Kristen Fontaine is a Registered Representative with INTE Securities LLC. INTE Securities LLC is a diversified financial services company engaged in the sale of specialized investment products. While at the present Ms. Fontaine is not currently engaged in any business activity, should she proceed with a sale of products she may be entitled to receive compensation from INTE for the sale of securities products.

Eolas Capital is a solicitor only and does not provide portfolio management services and financial advice in this capacity. Therefore, Ms. Fontaine would not be making recommendation as an Investment Adviser Representative of Eolas related to securities or insurance products offered by INTE Securities LLC as part of an investment portfolio.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Ms. Fontaine's receipt of additional compensation as a result of her other business activities.

Also, refer to the *Fees and Compensation, Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Eolas Capital LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by Eolas Capital LLC, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Alex Over, Director, Head of Distribution

Supervisor phone number: 617-468-4128

Item 7 Requirements for State Registered Advisers

Kristen Fontaine does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

McKenzie Jones, CFA

Eolas Capital LLC

**Ten Post Office Square
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May 24, 2022

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about McKenzie Jones that supplements the Eolas Capital LLC brochure. You should have received a copy of that brochure. Contact us at 617-468-4128 if you did not receive Eolas Capital LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about McKenzie Jones (CRD # 6675296) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

McKenzie Jones, CFA

Year of Birth: 1993

Formal Education After High School:

- Trinity College, BA Economics and Classics, 2015

Business Background:

- Eolas Capital LLC, Director of Institutional Sales/Solicitor, 11/2021 - Present
- INTE Securities LLC, Registered Representative, 2/2022 - Present
- ISO Hospitality, LLC , Co-Owner, 6/2021 - Present
- Newton, Institutional Business Development , 9/2021 - 10/2021
- MBSC Securities Corporation, Institutional Business Development, 5/2016 - 10/2021
- Mellon Investments Corporation, Institutional Business Development, 2/2018 - 8/2021
- Standish Mellon Asset Management, Business Development Analyst, 5/2017 - 2/2018
- BNY Mellon, 6/2015 Sales Support Analyst; 5/2016 Registered Representative, 6/2015 - 5/2017

Certifications: **CFA**

The Chartered Financial Analyst (CFA®) and Certification Mark (collectively, the "CFA marks") are professional certification marks granted in the United States and internationally by the CFA Institute.

The Chartered Financial Analyst® (CFA®) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 150,000 CFA charter holders working in more than 140 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own;
- Maintain independence and objectivity;
- Act with integrity;
- Maintain and improve their professional competence; and
- Disclose conflicts of interest and legal matters.

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates

report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA charter, visit www.cfainstitute.org

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Ms. McKenzie Jones has no required disclosures under this item.

Item 4 Other Business Activities

McKenzie Jones is a Registered Representative with INTE Securities LLC. INTE Securities LLC is a diversified financial services company engaged in the sale of specialized investment products. While at the present Ms. Jones is not currently engaged in any business activity, should she proceed with a sale of products she may be entitled to receive compensation from INTE for the sale of securities products.

Eolas Capital is a solicitor only and does not provide portfolio management services and financial advice in this capacity. Therefore, Ms. Jones would not be making recommendation as an Investment Adviser Representative of Eolas related to securities or insurance products offered by INTE Securities LLC as part of an investment portfolio.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Ms. Jones' receipt of additional compensation as a result of her other business activities.

Also, refer to the *Fees and Compensation, Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Eolas Capital LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by Eolas Capital LLC, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Alex Over, Director, Head of Distribution

Supervisor phone number: 617-468-4128

Item 7 Requirements for State Registered Advisers

McKenzie Jones does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

