

FORM ADV PART 2A DISCLOSURE BROCHURE

Pointer Financial Advisors, LLC

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<https://www.pointeradvisors.com>

March 21, 2024

This Form ADV Part 2A Disclosure Brochure ("Brochure") provides information about the qualifications and business practices of Pointer Financial Advisors LLC (hereinafter "Pointer Financial Advisors," or the "Firm," "we," "us," or similar designations). If you have any questions about the contents of the Brochure, please contact the Firm at 301-804-0250. The information in the Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

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

Pointer Financial Advisors LLC is an investment adviser registering with the SEC. Registration with the SEC or any state securities authority does not imply any level of skill or training.

Item 2. Material Changes

In this Item, Pointer Financial Advisors is required to discuss any material changes that have been made to the brochure since the last annual amendment. Since the initial filing of our firm's ADV Part 2A Brochure, on April 27, 2023, the following material changes have occurred:

Item # 1: Cover Page

- The United States Securities and Exchange Commission ("SEC") granted Pointer Financial Advisors registration as an investment adviser effective May 26, 2023.
- The Adviser's Business and Mailing Address was updated to 10500 Little Patuxent Parkway Suite 460 Columbia, MD 21044

Item # 4: Advisory Business

- As of June 20, 2023, the ownership Pointer Financial Advisors transferred from Christina Ruth Mudd to Timothy Nicholas Mudd. Mr. Mudd is currently the sole owner of Pointer Financial Advisors and its singular officer serving in these capacities: Chief Executive Officer ("CEO"), Chief Investment Officer ("CIO"), and Chief Compliance Officer ("CCO").
- Pointer Financial Advisors has implemented a website. The website is available at <https://www.pointeradvisors.com>.

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Item 4. Advisory Business

Description of Pointer Financial Advisors

Pointer Financial Advisors is organized as a limited liability company under the laws of the state of Maryland and inceptioned in April 2023. Pointer Financial Advisors is wholly owned by Timothy Nicholas Mudd.

Pointer Financial Advisors was launched to provide a broad range of investment advisory services to its clients. Pointer Financial Advisors offers a variety of advisory services, which include investment management services and financial planning services. Prior to the Firm's rendering of any of the foregoing advisory services, clients are required to enter into one or more written agreements with the Firm setting forth the relevant terms and conditions of the advisory relationship (the "Advisory Agreement").

While this Brochure generally describes the business of Pointer Financial Advisors, certain sections also discuss the activities of its Supervised Persons, which refer to the Firm's officers, partners, directors (or other persons occupying a similar status or performing similar functions), employees, and other persons who provide investment advice on the Firm's behalf and are subject to the Firm's supervision or control.

Description of Services

Investment Management and Wealth Management Services

Pointer Financial Advisors provides discretionary management services to its clients. Discretionary investment management services allow the Firm to implement its recommendations without prior consent from the client.

Pointer Financial Advisors primarily allocates client assets among various Common stocks, preferred stocks, convertible stocks, corporate bonds, government bonds, municipal bonds, mutual funds, and exchange traded funds. Portfolios are globally diversified to provide geographical diversification.

Where appropriate, the Firm also provides advice about any type of legacy position or other investment held in client portfolios. Clients can engage Pointer Financial Advisors to manage and/or advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance and annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans). In these situations, Pointer Financial Advisors directs or recommends the allocation of client assets among the various investment options available with the product. These assets are generally maintained at the underwriting insurance company, or the custodian designated by the product's sponsor.

Financial Planning Services

When desired by our clients, Pointer Financial Advisors provides certain financial planning services to its clients in the following areas, as appropriate for each client:

- Cash flow planning
- Retirement income planning
- Education funding planning
- Insurance [or risk management] planning
- Liability [or debt] planning
- Tax planning
- Estate planning
- Charitable planning

Pointer Financial Advisors provides such financial planning services as part of a bundled wealth management arrangement in conjunction with its investment management services if so desired by the client. Currently, Pointer Financial Advisors does not provide stand-alone financial planning services.

In performing financial planning services, Pointer Financial Advisors is not required to verify any information received from the client or from the client's other professionals (e.g., attorneys, accountants) and is expressly authorized to rely on such information. Pointer Financial Advisors recommends certain clients engage the Firm for additional related services and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists for the Firm to recommend that clients engage the Firm to provide (or continue to provide) additional services for compensation, including investment management services. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by Pointer Financial Advisors under a financial planning engagement. Clients are advised that it remains their responsibility to promptly notify the Firm of any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising the Firm's recommendations and/or services.

Tailoring of Advisory Services

Pointer Financial Advisors tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that advisory services are rendered in a manner consistent with those needs and objectives. The Firm consults with clients on an initial and ongoing basis to assess their specific investment objectives, income needs, risk tolerance, time horizon, liquidity constraints, tax situation, and other factors relevant to the management of their portfolios. Clients are advised to promptly notify the Firm if there are changes in their financial situation or if they wish to place any limitations on the management of their portfolios. Clients can impose reasonable restrictions or mandates on the management of their accounts if the Firm determines, in its sole discretion, the conditions would not materially impact the performance of a management strategy or prove overly burdensome to the Firm's management efforts.

Wrap Fee Programs

Pointer Financial Advisors does not offer advisory services through a wrap fee program.

Regulatory Assets Under Management

As of the date of this filing, Pointer Financial Advisors manages \$ 111,879,752 on a discretionary basis.

Item 5. Fees & Compensation

Advisory Fees

Pointer Financial Advisors offers investment management and Wealth Management services for an annual fee (“management fee”) based on the amount of assets under the Firm’s management based on a fee schedule reflected in the client’s advisory agreement. This management fee varies among clients and can be up to 1.25% of assets under management per year, depending upon, among other things, the size of a client’s portfolio. The Firm may charge clients an equivalent or lower rate for assets advised by the Firm that are held away from the primary custodian.

Pointer Financial Advisors can, in its sole discretion, negotiate to charge lesser fees based upon certain criteria, such as the overall scope of services to be provided to the client, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing/legacy client relationship, account retention, and pro bono activities.

The management fee is charged quarterly in advance based upon the market value of the assets being managed as of the last day of the previous quarter. If an engagement commences on a day other than the first day of a quarter, advisory fees are prorated for such quarter based on the number of days during such quarter for which advisory services were rendered by the Firm to the client. If an engagement terminates on a day other than the last day of a quarter, unearned fees are prorated for such quarter based on the number of days during the quarter for which advisory services were rendered, and any unearned fees are refunded to the client.

Direct Fee Debit

Clients provide the Firm with the authority to directly debit their accounts for payment of its investment management/wealth management fees. The Financial Institutions that act as the qualified custodian for client accounts, from which the Firm retains the authority to directly deduct fees, have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to Pointer Financial Advisors.

Additional Fees and Expenses

In addition to the management fees paid to Pointer Financial Advisors, clients also incur certain charges imposed by third parties, such as Independent Managers, fund managers, broker-dealers, custodians, trust companies, banks, and other financial institutions (collectively “Financial Institutions”). These additional charges include, among others, securities brokerage commissions; mark-ups and mark-downs on transactions in fixed-income securities; other transaction costs; custodial fees; reporting charges; charges imposed directly by a mutual fund or ETF in a client’s account, as disclosed in the fund’s prospectus (e.g., fund management fees, distribution fees, and other fund expenses); deferred sales charges; odd-lot differentials; transfer taxes; wire transfer and electronic fund fees; and other fees and taxes on brokerage accounts and securities transactions.

Item 6. Performance-Based Fees & Side-by-Side Management

Pointer Financial Advisors does not provide any services for a performance-based fee (i.e., a fee based on a share of capital gains or capital appreciation of a client’s assets).

Item 7. Types of Clients

Types of Clients

Pointer Financial Advisors offers investment management services to individuals, corporate entities, plan assets, trusts, estates, charitable organizations and family businesses.

Minimum Account Requirements

As a condition for starting and maintaining an investment advisory relationship with the Firm, the Firm generally imposes a minimum annual fee of \$4,000 for services. The Firm, in its sole discretion, can elect to waive this minimum annual fee requirement. For example, the Firm may waive the minimum for clients that appear to have significant potential for increasing your assets under our advisement.

Item 8. Methods of Analysis, Investment Strategies, & Risk of Investment Loss

Investing in securities involves a risk of loss that clients should be prepared to bear. There is no guarantee that any specific investment or strategy will be profitable for a particular client.

Methods of Analysis and Investment Strategies

Pointer Financial Advisors’ investment methodology begins with strategic allocation of client assets based on the risk profile of the client and the client’s investment objectives and other financial circumstances. This strategic allocation begins with the construction of a baseline portfolio which is then customized to meet the client’s individual objectives and financial circumstances. Portfolios are rebalanced periodically to meet each client’s investment objectives.

When recommending individual investments to clients, the Firm typically employs fundamental analysis, which involves an evaluation of the fundamental financial condition and competitive position of a particular fund or issuer. For Pointer Financial Advisors, this process typically involves an analysis of an issuer's management team, investment strategies, style drift, past performance, reputation and financial strength in relation to the asset class concentrations and risk exposures of the Firm's model asset allocations. A substantial risk in relying upon fundamental analysis is that while the overall health and position of a company may be good, evolving market conditions may negatively impact the security. The Firm will analyze, where appropriate, the issuer's income statements, cash flow statements, and balance sheets. Pointer Financial Advisors, in assessing individual securities, seeks investment opportunities for investors that offer superior companies at reasonable valuations.

Risk of Loss

The following list of risk factors does not purport to be a complete enumeration or explanation of the risks involved with respect to Pointer Financial Advisors' investment management activities.

General Economic Conditions

A client's portfolio could be adversely affected from time to time by such matters as changes in general economic, industrial and international conditions, changes in tax laws, prices and cost and other factors of a general nature that are beyond the control of the Firm. Geopolitical and other events (e.g., war or terrorism) may disrupt securities markets and adversely affect global economies and markets, thereby decreasing the value of an account's investments. Sudden or significant changes in the supply or prices of commodities or other economic inputs such as oil may have material and unexpected effects on both global securities markets and individual countries, regions, sectors, companies, or industries, which could significantly reduce the value of an account's investments. War, terrorism and related geopolitical events have led, and in the future may lead, to increased short-term market volatility and may have adverse long-term effects on U.S. and world economies and markets generally.

Market Risks

Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Pointer Financial Advisors' recommendations and/or investment decisions will depend to a great extent upon the future course of price movements of equity securities and other investments.

Volatility Risks

The prices and values of investments can be highly volatile and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

Interest-Rate Risks

Interest rates may fluctuate significantly, causing price volatility with respect to securities or instruments held by clients.

Cash-Management Risks

The Firm is authorized to invest some of a client's assets temporarily in money market funds or other similar types of investments, during which time an advisory account may be prevented from achieving its investment objective.

Mutual Funds and ETFs

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to actual NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for index-based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro-rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 20,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Equity-Related Securities and Instruments

The Firm will take positions in common stocks of U.S. and non-U.S. issuers traded on national securities exchanges and over-the-counter markets. The value of equity securities varies in response to many factors. These factors include, without limitation, factors specific to an issuer and factors specific to the industry in which the issuer participates. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments, and the stock prices of such companies may suffer a decline in response. In addition, equity securities are subject to stock risk, which is the risk that stock prices historically

rise and fall in periodic cycles. U.S. and non-U.S. stock markets have experienced periods of substantial price volatility in the past and may do so again in the future. In addition, investments in small-capitalization, mid-capitalization, and financially distressed companies may be subject to more abrupt or erratic price movements and may lack sufficient market liquidity, and these issuers often face greater business risks.

Fixed Income Securities

Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations. Additionally, the value of fixed-income securities is impacted by factors such as interest rates as well as market and economic factors.

Cybersecurity Risks

The information and technology systems of Pointer Financial Advisors and key service providers to the Firm and its clients may be vulnerable to potential damage or interruption from computer viruses; network failures; computer and telecommunication failures; infiltration by unauthorized persons and security breaches; usage errors by their respective professionals; power outages; and catastrophic events such as fires, tornadoes, floods, hurricanes, and earthquakes. Although the Firm has implemented various measures designed to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time, or cease to function properly, it may be necessary for the Firm to make a significant investment to fix or replace them and to seek to remedy the effect of these issues. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in the operations of the Firm or its clients' accounts and result in a failure to maintain the security, confidentiality, or privacy of sensitive data, including personal information.

COVID-19

This outbreak of COVID-19, or any future epidemic or pandemic similar to COVID-19, SARS, H1N1/09 flu or MERS, could have a significant adverse impact on a client's investments, could adversely affect a client's ability to meet its investment objectives, and could result in significant losses to a client. The extent of the impact of any outbreak on a client's investment performance depend on many factors, including the duration and scope of such outbreak, the development and distribution of treatments and vaccines for viruses such as COVID-19, the extent of its disruption to important global, regional and local supply chains and economic markets, and the impact of such outbreak on overall supply and demand, investor liquidity, consumer confidence and levels of economic activity, all of which are highly uncertain and cannot be predicted.

Key Man Risk

Pointer Financial Advisors is a small firm led by Timothy Nicholas Mudd, who as CEO and CIO is responsible for performing and overseeing several key functions including: (i) development of investment strategies and new product offerings; (ii) business development and client engagement; (iii) supervision of personnel; (iv) trading and research; and (v) operational risk assessments and service provider selection/monitoring. This fact of course leads to "key man risk," or the risk that something could happen to Mr. Mudd that negatively affects your portfolio and, in more severe situations, disrupt the continuation of firm services. To address key man risk,

the Firm has undertaken succession planning yet investors should also consider that the composition of personnel within an organization may change over time or a firm may cease operations due to loss of key personnel (or “Key Person Event”). When a Key Person Event occurs, there is a risk that new personnel or a successor organization may achieve less success than their predecessors.

Item 9. Disciplinary Information

Pointer Financial Advisors does not have any disciplinary actions to report in response to this item.

Item 10. Other Financial Industry Activities & Affiliations

Pointer Financial Advisors does not have any other financial industry affiliations to report in response to this Item.

Item 11. Code of Ethics, Participation or Interest in Client Transactions, & Personal Trading

Pointer Financial Advisors has adopted a code of ethics in compliance with applicable securities laws ("Code of Ethics") that sets forth the standards of conduct expected of its Supervised Persons. Pointer Financial Advisors' Code of Ethics contains written policies reasonably designed to prevent certain unlawful practices such as the use of material non-public information by the Firm or any of its Supervised Persons and the trading by the same of securities ahead of clients in order to take advantage of pending orders.

The Code of Ethics also requires certain of Pointer Financial Advisors' personnel to report their personal securities holdings and transactions and obtain pre-approval of certain investments (e.g., initial public offerings, limited offerings). However, the Firm's Supervised Persons are permitted to buy or sell securities that it also recommends to clients if done in a fair and equitable manner that is consistent with the Firm's policies and procedures. This Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by certain personnel to be completed without any appreciable impact on the markets of such securities. Therefore, under limited circumstances, exceptions may be made to the policies stated below.

When the Firm is engaging in or considering a transaction in any security on behalf of a client, no Supervised Person with access to this information may knowingly effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household) a transaction in that security unless:

- the transaction has been completed;
- the transaction for the Supervised Person is completed as part of a batch trade with clients; or
- a decision has been made not to engage in the transaction for the client.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments; (iii) shares issued by money market funds; and (iv) shares issued by other unaffiliated open-end mutual funds.

Clients and prospective clients may contact Pointer Financial Advisors to request a copy of its Code of Ethics.

Item 12. Brokerage Practices

Recommendation of Broker-Dealers and Custodians for Client Transactions

Pointer Financial Advisors recommends that clients utilize the custody, brokerage, and clearing services of Charles Schwab & Co., Inc., through its Schwab Advisor Services division ("Schwab") for investment management accounts. The final decision to custody assets with

Schwab is at the discretion of the client, including those accounts under ERISA or IRA rules and regulations, in which case the client is acting as either the plan sponsor or IRA account holder. Pointer Financial Advisors is independently owned and operated and not affiliated with Schwab. Schwab provides Pointer Financial Advisors with access to its institutional trading and custody services, which are typically not available to retail investors.

Factors which Pointer Financial Advisors considers in recommending Schwab or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research, and service. Schwab enables the Firm to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Schwab may be higher or lower than those charged by other Financial Institutions.

The commissions paid by Pointer Financial Advisors clients to Schwab comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where Pointer Financial Advisors determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Pointer Financial Advisors seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

Consistent with obtaining best execution, brokerage transactions are directed to certain broker-dealers in return for investment research products and/or services that assist Pointer Financial Advisors in its investment decision-making process. Such research will be used to service all of the Firm's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services, as well as the allocation of the benefit of such investment research products and/or services, poses a conflict of interest because Pointer Financial Advisors does not have to produce or pay for the products or services.

Pointer Financial Advisors periodically and systematically reviews its policies and procedures regarding its recommendation of Financial Institutions in light of its duty to obtain best execution.

Software and Support Provided by Financial Institutions

Pointer Financial Advisors receives without cost from Schwab administrative support, computer software, and related systems support, as well as other third-party support as further described below (together "Support"), which allow Pointer Financial Advisors to better monitor client accounts maintained at Schwab and otherwise conduct its business. Pointer Financial Advisors receives the Support without cost because the Firm renders investment management services to clients that maintain assets at Schwab. The Support is not provided in connection with securities. Clients should be aware that Pointer Financial Advisors receipt of economic benefits such as the Support from a broker-dealer creates a conflict of interest since these benefits may influence the Firm's choice of broker-dealer over another that does not furnish similar software,

systems support, or services. In fulfilling its duties to its clients, Pointer Financial Advisors endeavors at all times to put the interests of its clients first and has determined that the recommendation of Schwab is in the best interest of clients and satisfies the Firm's duty to seek best execution.

Specifically, Pointer Financial Advisors receives the following benefits from Schwab: (i) receipt of duplicate client confirmations and bundled duplicate statements; (ii) access to a trading desk that exclusively services its institutional traders; (iii) access to block trading, which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and (iv) access to an electronic communication network for client order entry and account information.

These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Nonetheless, this arrangement creates a conflict of interest, as it provides an incentive for the Firm to recommend Schwab's services to its clients in order to continue receiving such services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research (including that in the form of advice, analyses, and reports), and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to the Firm other products and services that benefit the Firm but may not benefit its clients' accounts. These benefits may include national, regional, or Firm-specific educational events organized and/or sponsored by Schwab.

Other potential benefits may include occasional business entertainment of Pointer Financial Advisors personnel by Schwab personnel, including meals, invitations to sporting events (including golf tournaments), and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist Pointer Financial Advisors in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information, and other market data; facilitate payment of the Firm's fees from its clients' accounts; and assist with back-office training and support functions, recordkeeping, and client reporting. Many of these services generally may be used to service all or some substantial number of the Firm's accounts, including accounts not maintained at Schwab.

Schwab also makes available to Pointer Financial Advisors other services intended to help the Firm manage and further develop its business enterprise. These services may include

professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance, and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to the Firm by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to the Firm. Although, as a fiduciary, Pointer Financial Advisors endeavors to act in its clients' best interests, the Firm's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefits received and not solely on the nature, cost, or quality of custody and brokerage services provided by Schwab, which creates a potential conflict of interest.

Client Referrals from Brokers

Pointer Financial Advisors does not consider, in selecting or recommending broker-dealers, whether the Firm receives client referrals from the broker-dealer.

Directed Brokerage

Pointer Financial Advisors does not permit clients to direct brokerage transactions to be executed with brokers of the client's choosing.

Trade Aggregation

Transactions for each client will generally be effected independently, unless Pointer Financial Advisors decides to purchase or sell the same securities for several clients at approximately the same time. Pointer Financial Advisors may (but is not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the Firm's clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and allocated among Pointer Financial Advisors' clients pro rata in relation to the purchase and sale orders placed for each client on any given day. To the extent that the Firm determines to aggregate client orders for the purchase or sale of securities, including securities in which Pointer Financial Advisors' Supervised Persons may invest, the Firm does so in accordance with applicable rules promulgated under the Investment Advisers Act of 1940 and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. Pointer Financial Advisors does not receive any additional compensation or remuneration as a result of the aggregation.

Item 13. Reviews of Accounts

Account Reviews

An investment adviser representative conducts ongoing reviews of each client's portfolio as part of the Firm's investment management services. An investment adviser representative will conduct a review of each client's accounts generally on a quarterly basis to ensure that the

Firm's investment recommendations continue to be suitable for the client, given the client's investment objectives and financial circumstances.

Account Statements and Reports

Clients are provided with transaction confirmation notices and regular summary account statements directly from the Financial Institutions where their assets are custodied. From time-to-time or as otherwise requested, clients may also receive written or electronic reports from Pointer Financial Advisors and/or an outside service provider, which contain certain account and/or market-related information, such as an inventory of account holdings or account performance. Clients should carefully review the statements sent directly by the custodian or broker-dealer and compare them to the reports received from Pointer Financial Advisors.

Item 14. Client Referrals & Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Please see a description of economic benefits received by the Firm in Item 12 above.

Compensation for Client Referrals

Pointer Financial Advisors does not currently compensate third parties for client referrals.

Item 15. Custody

Pointer Financial Advisors is deemed to have custody of client funds and securities solely because the Firm is authorized to deduct its advisory fees directly from client accounts.

As such, Pointer Financial Advisors is required to comply with the requirements set forth in the Custody Rule under the Advisers Act which requires, among other things, that client funds and securities be maintained with a qualified custodian. The custodians or broker-dealers that serve as qualified custodians on behalf of Pointer Financial Advisors' clients have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account, including the amount of advisory fees paid directly to Pointer Financial Advisors. In addition, as discussed in Item 13 above, Pointer Financial Advisors may also send periodic supplemental reports to clients. Clients should carefully review the statements sent directly by the custodian or broker-dealer and compare them to the reports received from Pointer Financial Advisors.

Item 16. Investment Discretion

Pointer Financial Advisors is given discretionary authority to manage each client's account. Pointer Financial Advisors is considered to exercise investment discretion over a client's account if it can effect and/or direct transactions in client accounts without first seeking client consent. Pointer Financial Advisors is given this authority through a limited power-of-attorney included in the Advisory Agreement with the client. Clients may request a limitation on this

authority (such as certain securities not to be bought or sold). Pointer Financial Advisors takes discretion over the following activities:

- The securities to be purchased or sold;
- The amount of securities to be purchased or sold; and
- When transactions are done.

Item 17. Voting Client Securities (Proxy Voting)

Pointer Financial Advisors accepts the authority to vote a client's securities (i.e., proxies) on their behalf. When Pointer Financial Advisors accepts such responsibility, it will only cast proxy votes in a manner consistent with the best interest of its clients. Absent special circumstances, which are fully-described in the Firm's Proxy Voting Policies and Procedures, all proxies will be voted consistent with guidelines established and described in Pointer Financial Advisors' Proxy Voting Policies and Procedures, as they may be amended from time-to-time. Clients may contact Pointer Financial Advisors at the mailing address or phone number on the cover of this Brochure to request information about how the Firm voted proxies for that client's securities or to get a copy of the Firm's Proxy Voting Policies and Procedures. A brief summary of Pointer Financial Advisors' Proxy Voting Policies and Procedures is as follows:

- The Firm generally votes with management so long as management's proposals are in the best interests of our clients and are consistent with our clients' investment objectives; and
- With respect to conflicts of interest, our Firm will disclose the conflict to our clients and, where deemed necessary, abstain from voting the proxy. .

Item 18. Financial Information

Pointer Financial Advisors does not have any financial condition or impairment that would prevent the Firm from meeting its contractual commitments to clients. The Firm does not take physical custody of client funds or securities or serve as trustee or signatory for client accounts, and it does not require the prepayment of more than \$1,200 in fees six or more months in advance.

The Firm has not filed a bankruptcy petition at any time in the past ten years.