

Item 1 - Cover Page



THREE POINTS FINANCIAL, INC.
Fee-Only, Tax Focused Financial Planning

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This Brochure provides information about the qualifications and business practices of Three Points Financial, Inc., also termed “TPF” within this brochure. If you have any questions about the contents of this Brochure, please contact us at: 719-495-7163 or email at mary@threepointsfinancial.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Three Points Financial, Inc. is an SEC- registered investment advisor. Registration of an investment advisor does not imply any level of skill or training. The oral and written communications of an advisor provide you with information about which you determine to hire or retain an advisor.

Additional information about Three Points Financial, Inc. is available on the SEC’s website at www.Adviserinfo.sec.gov.

Item 2 - Material Changes

Material Changes since the Last Update

The following changes have occurred since the Last Update of March 2, 2023:

- Update to ownership, removal of firm personnel, replacement of CCO, and other non-material changes are made herein.

Currently our Brochure may be requested by contacting Three Points Financial, Inc., Mary R. Alpers, 719-495-7163, mary@threepointsfinancial.com. Brochures are provided free of charge.

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Item 4 – Advisory Business

Three Points Financial, Inc. (“TPF”) is a fee-only comprehensive financial planning firm that specializes in providing comprehensive, tax-focused financial planning and investment advisory services to individuals and families. TPF was established as an S-Corporation in May 2006 (previous name-Alpers Financial Planning, Inc.)

Firm Ownership

Mary R. Alpers (CRD#4777789) is the sole owner.

Firm Description

TPF offers a wide range of financial services. Specifically, TPF distinguishes itself from traditional investment advisory firms by providing comprehensive services for clients that include investment analysis, strategies, and recommendations, retirement planning, tax and estate planning, risk management, business development, rental analysis, and more. TPF holds itself to a fiduciary standard, which means we act in utmost good faith in what we believe is in the best interest of each one of our clients. As fiduciary investment advisors, we are legally required to put your interests first. We do not sell insurance or investment products, and we do not accept commissions from any product recommendations we make to you. We do not pay referral or finder’s fees, nor do we accept such fees from other firms. TPF accepts non-discretionary trading authority for clients’ accounts. Non-discretionary authority requires TPF to obtain the Client’s prior approval of each specific transaction prior to executing investment trades, as well as for the selection and retention of sub-advisors to the account. TPF will act in accordance with a Statement of Investment Policy (or similar document used to establish the Client’s objectives and suitability) regardless of whether authority is discretionary or non-discretionary. TPF will only execute transactions for clients when specifically requested, approved, and authorized by clients in writing (via a fully executed limited power of attorney “LPOA”) for non-discretionary clients.

TPF and the Client will enter into an agreement which details the scope of the relationship and responsibilities of both TPF and the Client. Advice and services provided under the agreement are tailored to the stated objectives of the Client(s). TPF provides the following three types of services:

1. Open Retainer: An Open Retainer provides comprehensive fiduciary financial planning for a fixed fee. Clients will be asked to meet on a regular basis in the initial year, and two to four meetings are typically scheduled in subsequent years, depending on a client’s complexity, tax preparation, and client preference. After the first year, we renew the contract with an ongoing renewal automatic agreement, unless terminated by either the Client or TPF. In addition to scheduled meetings, additional face-to-face, e-mail and/or phone consultations are included at no additional charge. Our ongoing services provide reasonable availability to

the Client throughout the year. Additional face to face meetings requested by the Client beyond regularly scheduled meetings are accommodated into the schedule as needed and as is reasonable.

Initial Year of Open Retainer - Scheduled meeting topics are listed below. TPF will schedule meetings to cover those topics relevant to you, such as:

- Tax preparation (if included in contract)
- Budgeting and cash flow
- Goal Setting
- Tax planning
- Inventory/Analysis of client assets, including Rental Property(ies)
- Retirement planning
- Portfolio analysis
- Develop asset allocation strategies/recommendations
- Estate planning review
- Implementation of investment recommendations upon Client request
- Small business analysis
- Insurance analysis
- Education planning
- Analysis of employee benefits

Renewal Years of Open Retainer - Typical topics covered:

- Tax planning & Tax preparation, Including Ongoing Rental Analysis
- Goal setting review (as needed)
- Investment review/Rebalancing/Recommendations
- Retirement plan updates
- Review Estate Planning periodically
- Review Insurance periodically
- Other financial planning topics (namely change of residence, business analysis)

2. Limited Retainer: If an Open Retainer relationship is not desired or practical, Limited Retainer services are also offered. Limited Retainer services are narrower in scope and usually focus on one or more of the following areas but without comprehensive retainer services: goal setting, asset/liability analysis, tax planning, cash flow management, investment review, retirement planning, risk management, estate planning and record keeping. The service includes various client consultations as well as written and/or oral recommendations resulting from such consultations. The Limited Retainer does not constitute a comprehensive financial planning engagement and follow-up advice and/or implementation assistance is not

provided following the completion of the project. In a Limited Retainer, TPF does not execute recommendations on behalf of Clients in a Limited Retainer engagement. Clients are responsible, but under no obligation, to implement any recommendations made by TPF. Additionally, tax return preparation is not automatically included with the Limited Retainer, but may be purchased as part of this service, at the Client's request and based on TPF's availability during tax season. Clients who wish to upgrade to the Open Retainer option may receive credit toward Open Retainer fees for all amounts paid under Limited Retainer agreements for the past six months.

Assets Under Management

As of December 31, 2023, TPF had approximately \$119,187,967 in non-discretionary assets under management.

Item 5 – Fees and Compensation

Open Retainer

Initial and Renewal Open Retainers: \$10,000 - \$75,000

Fees are calculated upon contract initiation, payable quarterly, in advance. Fees are calculated based on the Client(s) total income, assets, and overall complexity of the Client's financial situation. Infrequent and occasional fee adjustments will occur. We do not charge specifically for assets under management.

Add-ons, credits, and miscellaneous adjustments: A charge of \$350.00 is assessed for each amended tax return prepared, if applicable. A charge of up to \$250.00 per return is assessed for additional tax returns prepared for dependents of the client. Any credits or adjustments will be determined in the sole discretion of Advisor.

Limited Retainer

Flat fee Limited Retainers are due in full at the beginning of the engagement or payable quarterly depending upon the scope of the Limited Retainer. In no event will TPF collect more than \$1,200.00 more than six months in advance of service provided from any Client.

Annual Limited Retainer (2 meetings/year): \$5,000 - \$15,000.

One-time Project-Oriented Limited Retainer: \$5,000 - \$15,000.

In addition to TPF's fee, clients may incur certain other fees and charges to implement the Advisor's recommendations. Additional charges and fees will be imposed by custodians, brokers, third party investment and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. Mutual funds and exchange traded funds also

charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to TPF's fee. TPF seeks the best investment recommendations for the Client, including avoiding recommending investments with excessive fees and high internal costs.

Fees are generally not negotiable. The Client may terminate an engagement by providing written notice within five days of signing a retainer agreement and will receive a return of all fees. After that time, either party may terminate an agreement, without penalty, at any time upon 30 days written notice. Any prepaid but unearned fees will be promptly refunded by TPF. Any fees that have been earned but not yet paid by Client will be due and payable. Whether fees have been earned or unearned will be determined in TPF's sole discretion.

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

TPF does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

TPF provides financial planning and investment advisory services primarily to individuals and couples. We offer different services based on the complexity of each client's situation, including clients with small businesses and high net worth clients. As discussed above, your chosen relationship agreement and fee will be based upon your individual circumstances.

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

The cornerstone of TPF's investment strategy is disciplined asset allocation. Within the context of a comprehensive financial plan, TPF believes that proper asset allocation is a primary determinant of investment performance.

The main sources of information TPF may rely upon when researching and analyzing securities will include traditional research materials such as financial newspapers and magazines, annual reports, prospectuses, filings with the SEC, as well as research materials prepared by others, company press releases and corporate rating services. TPF also subscribes to various professional publications deemed to be consistent and supportive of TPF's investment philosophy.

Moreover, TPF approaches investment portfolio analysis and implementation based on internal factors such as a client's tax situation, overall risk tolerance, current financial situation, and personal goals and aspirations. After identifying these items, a client's portfolio will be structured around individual needs.

In general, TPF recommends no-load mutual funds (i.e., mutual funds that have no sales fees), exchange traded funds, U.S. government securities, money market accounts, certificates of deposit, and individual bonds (corporate, agency and municipal). However, while providing investment advice, TPF may address issues related to other types of assets including those that you already own. Any other products that may be deemed appropriate for you will be discussed, based upon your goals, needs and objectives. TPF is a Dimensional Funds Approved Advisor. DFA Dimensional offers institutional class, no-load passively invested mutual funds. Investing in securities involves risk of loss that clients should be prepared to bear. While TPF will use its best judgment and good faith efforts in rendering services to a client, not every investment decision or recommendation made by TPF will be profitable. TPF cannot warrant or guarantee any level of account performance, or that an account will be profitable over time. The Client assumes all market risk involved and understands that investment decisions are subject to various market, currency, economic, political, and business risks.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of TPF or the integrity of TPF management. TPF has no information to disclose applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Neither TPF nor any of its management persons are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. Neither TPF nor any of its management persons is registered or applying to become registered as a future commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of such.

TPF is affiliated with the Alliance of Comprehensive Planners (ACP). This non-profit, member-owned organization provides training and support through an alliance of fee-only comprehensive financial advisors. As a member of ACP, TPF has the right to use proprietary products and systems designed by ACP. ACP provides ongoing training in the form of conferences and services produced by collaborative efforts of the fee-only financial advisors.

TPF is also affiliated with the National Association Financial Advisors (NAPFA), which requires that their members are fee-only.

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

TPF seeks to avoid material conflicts of interest. Accordingly, neither TPF nor its investment adviser representatives nor its team members receive any third party direct monetary

compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

However, some additional services and non-direct monetary or other forms of compensation may be offered and provided to TPF because of its relationships with custodian(s) and/or providers of mutual fund products. For example, TPF's representatives and employees may be invited to attend educational conferences and/or entertainment events sponsored by such brokerage firms or custodians or mutual fund companies. TPF believes that the services and benefits provided to it by brokerage firms (custodians) and mutual fund providers do not materially affect the investment management recommendations made to clients. However, in the interest of full disclosure of any potential conflicts of interest, we discuss the possible conflicts herein.

Although TPF believes that its business methodologies, ethics rules, and adopted policies are appropriate to eliminate potential material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain, clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. In any event, TPF will disclose to advisory clients any material conflict of interest relating to TPF, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Our Code of Ethics

TPF has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons of TPF must acknowledge the terms of the Code of Ethics annually, or as amended.

Participation or Interest in Client Transactions and Personal Trading

TPF does not currently participate in securities in which it has a material financial interest. TPF and its related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which the firm or its related persons has a material financial interest.

TPF or individuals associated with TPF may buy and sell some of the same securities for its own account that TPF buys and sells for its clients. In some cases, TPF may buy or sell securities for its own account for reasons not related to the strategies adopted by the TPF's clients. The Code of Ethics is designed to ensure that the personal securities transactions will

not interfere with making decisions in the best interest of advisory clients while at the same time, allowing employees to invest for their own accounts.

In such cases a potential conflict exists between the interests of the TPF and employees of TPF and the interests of the client. In order to eliminate the potential for conflict in these circumstances, it is the policy of TPF that any such trading activity will be limited to widely held publicly traded stocks, government securities, mutual funds or exchange traded funds. Certain classes of securities, such as open-ended mutual funds, are designated as exempt transactions, meaning employees may trade these without prior permission because such trades would not materially interfere with the best interest of TPF's clients.

TPF will disclose to advisory clients any material conflict of interest relating to TPF, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Item 12 – Brokerage Practices

TPF does not use its discretion when recommending a broker-dealer. Clients are not obligated to effect transactions through any broker-dealer recommended by TPF. When recommending a broker-dealer TPF will comply with its fiduciary duty to obtain best execution and with the Securities Exchange Act of 1934, and will consider such relevant factors as:

- Price
- The broker-dealers' facilities, reliability, and financial responsibility
- The ability of the broker-dealer to effect transactions, particularly with regard to such aspects as timing, order size and execution of order
- The research and related brokerage services provided by such broker or dealer to AFP, notwithstanding that the account may not be the direct or exclusive beneficiary of such services; and
- Any other factors the Advisor considers to be relevant.

Item 13 - Review of Accounts

Mary R. Alpers is responsible for reviewing and providing recommendations for client accounts. For ongoing retainer clients, factors triggering a review may include significant changes in your financial condition, changes in the fundamentals of the companies or entities issuing securities, price fluctuations and significant economic or industry developments, and periodic rebalancing of investment assets. Reviews occur on an annual or more frequent basis. Clients in a Limited Retainer engagement typically do not receive reviews. Clients are urged to contact TPF for a review of any prior recommendations when changes occur to their situation. If you maintain any brokerage account(s), your custodian will provide a statement

at least quarterly which includes a list of all assets held in the account, asset values, and all transactions affecting the account assets, including any additions or withdrawals.

Item 14 - Client Referrals and Other Compensation

TPF is a fee-only financial planning firm and does not sell insurance or investment products, nor does it accept commissions because of any product recommendations. TPF does not pay referral or finder's fees, nor does it accept such fees from other firms.

Item 15 - Custody

TPF does not have custody over client funds and securities. Clients will receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains the Client's investment assets. TPF urges all clients to carefully review such statements and compare such official custodial records to any statements that we may provide to you. TPF may also provide clients with periodic reports on their accounts. These reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For those client accounts for which TPF maintains a standing letter of authorization (SLOA) on file with a qualified custodian to send funds or securities to a third party, TPF is deemed to have constructive custody. The Firm follows the safeguards noted in the SEC's No-Action Letter of February 21, 2017, and therefore is not subject to a surprise annual audit.

Item 16 - Investment Discretion

TPF does not have discretionary authority over the Client's accounts. TPF accepts non-discretionary authority which requires TPF to obtain the Client's prior approval of each specific transaction prior to executing investment recommendations, as well as for the selection and retention of sub-advisors to the account. TPF will act in accordance with a Statement of Investment Policy. TPF will only execute transactions for clients when specifically requested and authorized by the Client in writing (and via a fully executed limited power of attorney "LPOA"). In some cases, the Client is in charge of implementing all recommendations.

Item 17 – Voting Client Securities

TPF does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for all securities maintained in client portfolios. At the request of a Client, TPF may provide advice to clients regarding the Clients' voting of proxies.

Item 18 – Financial Information

Registered Investment Advisors are required to provide you with certain financial information or disclosures about their financial condition. TPF has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of bankruptcy proceedings. TPF does not require prepayment of more than \$1,200 in fees per client, six months or more in advance.