



**Item 1 – Cover Page**

**FIRM BROCHURE  
PART 2A of FORM ADV, APPENDIX 1  
WRAP FEE PROGRAM**

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This brochure provides information about the qualifications and business practices of LPFG, LLC d.b.a. Landing Point Financial Group. If you have any questions regarding the contents of this brochure, please do not hesitate to contact us at (440) 361-7227. 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.

Landing Point Financial Group is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training. Additional information about Landing Point Financial Group is available on the SEC's website at <https://adviserinfo.sec.gov/>.

**March 13, 2024**

## **Item 2 – Material Changes**

Form ADV Part 2A requires registered investment advisers to amend their wrap fee program brochure when information becomes materially inaccurate. If there are any material changes to an adviser's wrap fee program brochure, the adviser is required to notify you and provide you with a description of the material changes. Landing Point Financial Group previously filed the annual update for this Brochure on January 29, 2024. Since that filing, the following material changes have occurred:

- **Item 1** – The firm changed its legal name to LPFG, LLC d.b.a Landing Point Financial Group.
- **Item 9** – Added disclosure related to firm personnel that are Certified Public Accountants (CPAs) and provide tax preparation and planning services on a standalone basis for an additional fee.

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## **Item 4 – Services, Fees, and Compensation**

LPFG, LLC Landing Point Financial Group (“Landing Point” or the “Firm”) is a limited liability company organized in the State of Ohio. Landing Point is an investment advisory firm registered with the United States Securities and Exchange Commission (“SEC”). The Firm has operated as an independent investment adviser since 2021 and is wholly owned by Joe Flinner.

The Landing Point Wrap Fee Program (the “Program”) is an investment advisory program sponsored by Landing Point. This Brochure describes the Program as it relates to clients receiving services through the Program. In addition to the Program, the Firm offers financial planning and consulting services on a standalone basis. Information about these services is contained in the Firm’s Form ADV Part 2A.

### **A. Description of the Program**

Landing Point provides investment management services as the sponsor and manager of the Program. The Program primarily utilizes registered mutual funds and exchange traded funds (ETFs), but also invests in equity securities, corporate bonds, REITS, fixed and variable annuities, insurance products and private investment vehicles, among others, if we determine such investments fit within a client’s objectives and are in the best interest of our clients. Landing Point is the sole portfolio manager in the Program. The Program is limited in its investment scope and may be utilized for only a portion of a client’s investable assets. Under the Program the client pays a single fee (“Program Fee”) for Landing Point’s investment advice, custody and commissions for securities transactions executed through the Program custodian/broker-dealer, as described below. See Additional Fees and Expenses below for information regarding fees and expenses not included in the Program Fee.

Prior to receiving services under the Program, clients are required to enter into a written agreement with Landing Point setting forth the relevant terms and conditions of the advisory relationship. Clients must also open a new securities brokerage account and complete a new account agreement with National Financial Services LLC and Fidelity Brokerage Services LLC (together with affiliates, “Fidelity”), which is a “qualified custodian” as that term is described in Rule 206(4)-2 of the Advisers Act or another brokerdealer that Landing Point approves under the Program (collectively “Financial Institutions”).

### **B. The Program Fee**

The Program Fee covers Landing Point’s advisory services, custody, and commissions for securities transactions effected through Fidelity. The number of transactions made in clients’ accounts, the size of the accounts, and the securities used to construct a portfolio, as well as the commissions charged for each transaction, determines the relative cost of the Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Participants in the Program may pay a higher or lower aggregate fee than if the investment management and brokerage services are purchased separately. Landing Point does not charge its clients higher advisory fees based on their trading activity, but clients should be aware that Landing Point may have an incentive to limit its trading activities in client accounts because Landing Point is charged for executed trades.

Cash Positions

At any specific point in time, depending upon perceived or anticipated market conditions or events (there being no guarantee that such anticipated market conditions/events will occur), Landing Point may maintain cash positions for defensive or other purposes. All cash positions (money markets, etc.) will be included as part of assets under management for purposes of calculating the Program Fee.

Additional Fees and Expenses

In addition to the Program Fee, clients will be responsible for transfer taxes, odd lot differentials, exchange fees, interest charges, ADR processing fees and any charges, taxes or other fees mandated by any federal, state or other applicable law, retirement plan account fees (where applicable), electronic fund and wire fees. Furthermore, Landing Point fees do not cover transaction fees or “trade away” fees imposed for trades placed away from Fidelity.

Wrap Fee for Investment Management Services

Landing Point charges an annual Program Fee that is agreed upon with each client and set forth in an agreement executed by Landing Point and the client, which is typically based on a percentage of the value of assets under management. An asset-based Program Fee for the initial month shall be paid, on a pro rata basis, in arrears, based on the value of the net billable assets under management at the end of such initial month. For subsequent months, the Program Fee shall be paid, in advance, based on the asset value of the client’s accounts as of the last business day of the preceding month as provided by third-party sources, such as pricing services, custodians, fund administrators, and client-provided sources.

Landing Point charges a maximum Program Fee of 1.8% of assets under management to clients enrolled in the wrap fee program.

Notwithstanding the foregoing, Landing Point and the client may choose to negotiate a Program Fee that varies from the terms and conditions described above. Factors upon which a different Program Fee may be based include, but are not limited to, the size and nature of the relationship, the services rendered, the nature and complexity of the products and investments involved, time commitments, and travel requirements. In addition, some legacy clients may be grandfathered under the fee schedules as listed in their individual account agreements in effect at the time they became a client, which may result in fees higher or lower than those listed above. The Program Fee charged by the Firm will apply to all of the client’s assets in the Program, unless specifically excluded in the client agreement. Although Landing Point believes that its fees are competitive, clients should understand that lower fees for comparable services may be available from other sources and firms.

The investment advisory agreement between Landing Point and the client may be terminated at will by either Landing Point or the client upon written notice. Landing Point does not impose termination fees when the client terminates the investment advisory relationship, except when agreed upon in advance.

Payment of Fees

Landing Point generally deducts the Program Fee from a client’s investment account(s) held at his/her custodian. Upon engaging Landing Point to manage such account(s), a client grants Landing Point this limited authority through a written instruction to the custodian of his/her account(s). The client is

responsible for verifying the accuracy of the calculation of the advisory fee; the custodian will not determine whether the fee is accurate or properly calculated. A client may utilize the same procedure for financial planning or consulting fees if the client has investment accounts held at a custodian.

Although clients generally are required to have their investment advisory fees deducted from their accounts, in some cases, Landing Point will directly bill a client for program fees if it determines that such billing arrangement is appropriate given the circumstances, which direct billing may include the issuance of an invoice to the client.

The custodian of the client's accounts provides each client with a statement, at least quarterly, indicating separate line items for all amounts disbursed from the client's account(s), including any fees paid directly to Landing Point. Clients may make additions to and withdrawals from their account at any time, subject to Landing Point's right to terminate an account. Additions may be in cash or securities provided that the Firm reserves the right to liquidate transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets at any time on notice to Landing Point, subject to the usual and customary securities settlement procedures. However, the Firm generally designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. Landing Point may consult with its clients about the options and implications of transferring securities. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, short-term redemption fees, fees assessed at the mutual fund level (e.g. contingent deferred sales charges) and/or tax ramifications which are not covered under the Program Fee.

### **C. Compensation for Recommending the Program**

Landing Point does not have any arrangements where it receives an economic benefit from a third party for recommending the Program.

## **Item 5 – Account Requirements and Types of Clients**

Landing Point offers investment advisory services to individuals, including high net worth individuals. Landing Point does not impose a minimum portfolio size or a minimum initial investment to open a Program account. However, Landing Point does reserve the right to accept or decline a potential client for any reason in its sole discretion.

## **Item 6 – Portfolio Manager Selection and Evaluation**

The Program does not currently select other advisers in addition to Landing Point, which is the only portfolio manager for the Program.

### **A. Advisory Services Offered by Landing Point**

Landing Point provides holistic and personalized financial planning and discretionary investment advisory services to individuals, high net worth individuals, charitable organizations, and small businesses. In addition to the Program, Landing Point provides the following advisory services.

Investment Management Services

Landing Point offers investment management services on a discretionary basis. All investment advice provided is customized to each client's investment objectives and financial needs. Landing Point tailors its advisory services to meet the needs of its individual clients and seeks to ensure, on a continuous basis, that client portfolios are managed in a manner consistent with those needs and objectives. Landing Point consults with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios. The information provided by the client, together with any other information relating to the client's overall financial circumstances, will be used by Landing Point to determine the appropriate portfolio asset allocation and investment strategy for the client. Clients are advised to promptly notify Landing Point if there are changes in their financial situation.

Landing Point primarily allocates client assets among various mutual funds, exchange-traded funds ("ETFs"), individual debt and equity securities, and independent investment managers ("External Managers") in accordance with their stated investment objectives.

Landing Point may further recommend to clients that all or a portion of their investment portfolio be managed on a discretionary basis by one or more unaffiliated money managers or investment platforms ("External Managers"). The client may be required to enter into a separate agreement with the External Manager(s), which will set forth the terms and conditions of the client's engagement of the External Manager. Landing Point generally renders services to the client relative to the discretionary selection of External Managers. Landing Point also assists in establishing the client's investment objectives for the assets managed by External Managers, monitors and reviews the account performance and defines any restrictions on the account. The investment management fees charged by the designated External Managers, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are exclusive of, and in addition to, the annual advisory fee charged by Landing Point.

Financial Planning and Consulting Services

Landing Point offers personal comprehensive financial planning services to set forth goals, objectives and implementation strategies for the client over the long-term. Depending upon individual client requirements, the comprehensive financial plan will include recommendations and or all of the following:

- |                                                               |                                                           |
|---------------------------------------------------------------|-----------------------------------------------------------|
| <input checked="" type="checkbox"/> Business Planning         | <input checked="" type="checkbox"/> Retirement Planning   |
| <input checked="" type="checkbox"/> Cash Flow Forecasting     | <input checked="" type="checkbox"/> Risk Management       |
| <input checked="" type="checkbox"/> Trust and Estate Planning | <input checked="" type="checkbox"/> Charitable Giving     |
| <input checked="" type="checkbox"/> Financial Reporting       | <input checked="" type="checkbox"/> Distribution Planning |
| <input checked="" type="checkbox"/> Investment Consulting     | <input checked="" type="checkbox"/> Tax Planning          |
| <input checked="" type="checkbox"/> Insurance Planning        | <input checked="" type="checkbox"/> Manager Due Diligence |

Landing Point prepares and provides the financial planning client with a written comprehensive financial plan and performs quarterly, semi-annual or annual reviews of the plan with the client, dependent on the client's needs in accordance with the financial planning agreement. Clients should notify us promptly anytime there is a change in their financial situation, goals, objectives, or needs and/or if there is any change to the financial information initially provided to us.

Clients are under no obligation to implement any of the recommendations provided in their written financial plan. However, should a client decide to proceed with the implementation of the investment recommendations then the client can either have Landing Point implement those recommendations or utilize the services of any investment adviser or broker-dealer of their choice. Landing Point may recommend 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 if clients engage Landing Point or its affiliates to provide additional services for compensation.

Landing Point cannot provide any guarantees or promises that a client's financial goals and objectives will be met.

**B. Client Tailored Advisory Services**

Clients may impose reasonable restrictions on the management of their accounts if Landing Point determines, in its sole discretion, that the conditions would not materially impact the performance of a management strategy or prove overly burdensome for Landing Point's management efforts.

**C. The Program**

As described above, Landing Point is the primary portfolio manager of the Program. Landing Point may manage client assets in the Program differently than those assets maintained in other client accounts. The Program primarily utilizes registered mutual funds and exchange traded funds (ETFs), but may invest in equity securities, corporate bonds, REITS, fixed and variable annuities, insurance products and private investment vehicles, among others.

**D. Performance-Based Fees and Side-By-Side Management**

Landing Point does not charge performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. 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. Landing Point's fees are calculated as described in Item 5 above.

**E. Methods of Analysis, Investment Strategies, and Risk of Loss**

Methods of Analysis, Investment Strategies

Landing Point employs various tools and materials in its analysis of investments for the Program. Security analysis methods include fundamental analysis of a security's historical and present data, as well as relevant information regarding the issuer, such as management, competitive advantages, competitors and markets. In addition, Landing Point reviews various market and economic data in determining the securities utilized for the Program.

Risk of Loss

Investing in securities involves a significant risk of loss which clients should be prepared to bear. Landing Point's investment recommendations are subject to various market, currency, economic, political and business risks, and such investment decisions will not always be profitable. Clients should be aware that there may be a loss or depreciation to the value of the client's Program account. There can be no assurance

that the client's or the Program's investment objectives will be obtained and no inference to the contrary should be made.

Generally, the market value of equity stocks will fluctuate with market conditions, and small- stock prices generally will fluctuate more than large-stock prices. The market value of fixed income securities will generally fluctuate inversely with interest rates and other market conditions prior to maturity. Fixed income securities are obligations of the issuer to make payments of principal and/or interest on future dates, and include, among other securities: bonds, notes and debentures issued by corporations; debt securities issued or guaranteed by the U.S. government or one of its agencies or instrumentalities, or by a non-U.S. government or one of its agencies or instrumentalities; municipal securities; and mortgage-backed and asset- backed securities. These securities may pay fixed, variable, or floating rates of interest, and may include zero coupon obligations and inflation-linked fixed income securities. The value of longer duration fixed income securities will generally fluctuate more than shorter duration fixed income securities. Investments in overseas markets also pose special risks, including currency fluctuation and political risks, and it may be more volatile than that of a U.S. only investment. Such risks are generally intensified for investments in emerging markets. In addition, there is no assurance that a ETF will achieve its investment objective. Past performance of investments is no guarantee of future results.

Additional risks involved in the securities recommended/utilized by Landing Point as part of the Program include, among others:

- *Stock market risk*, which is the chance that stock prices overall will decline. The market value of equity securities will generally fluctuate with market conditions. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. Prices of equity securities tend to fluctuate over the short term as a result of factors affecting the individual companies, industries or the securities market as a whole. Equity securities generally have greater price volatility than fixed income securities.
- *Sector risk*, which is the chance that significant problems will affect a particular sector, or that returns from that sector will trail returns from the overall stock market. Daily fluctuations in specific market sectors are often more extreme than fluctuations in the overall market.
- *Issuer risk*, which is the risk that the value of a security will decline for reasons directly related to the issuer, such as management performance, financial leverage, and reduced demand for the issuer's goods or services.
- *Non-diversification risk*, which is the risk of focusing investments in a small number of issuers, industries or foreign currencies, including being more susceptible to risks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be.
- *Value investing risk*, which is the risk that value stocks not increase in price, not issue the anticipated stock dividends, or decline in price, either because the market fails to recognize the stock's intrinsic value, or because the expected value was misgauged. If the market does not recognize that the securities are undervalued, the prices of those securities might not appreciate as anticipated. They also may decline in price even though in theory they are already undervalued. Value stocks are typically less volatile than growth stocks, but may lag behind growth stocks in an up market.

- *Smaller company risk*, which is the risk that the value of securities issued by a smaller company will go up or down, sometimes rapidly and unpredictably as compared to more widely held securities. Investments in smaller companies are subject to greater levels of credit, market and issuer risk.
- *Foreign (non-U.S.) investment risk*, which is the risk that investing in foreign securities result in the portfolio experiencing more rapid and extreme changes in value than a portfolio that invests exclusively in securities of U.S. companies. Risks associated with investing in foreign securities include fluctuations in the exchange rates of foreign currencies that may affect the U.S. dollar value of a security, the possibility of substantial price volatility as a result of political and economic instability in the foreign country, less public information about issuers of securities, different securities regulation, different accounting, auditing and financial reporting standards and less liquidity than in the U.S. markets.
- *Interest rate risk*, which is the chance that prices of fixed income securities decline because of rising interest rates. Similarly, the income from fixed income securities may decline because of falling interest rates.
- *Credit risk*, which is the chance that an issuer of a fixed income security will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that fixed income security to decline.
- *Exchange Traded Fund (ETF) risk*, which is the risk of an investment in an ETF, including the possible loss of principal. ETFs typically trade on a securities exchange and the prices of their shares fluctuate throughout the day based on supply and demand, which may not correlate to their net asset values. Although ETF shares will be listed on an exchange, there can be no guarantee that an active trading market will develop or continue. Owning an ETF generally reflects the risks of owning the underlying securities it is designed to track. ETFs are also subject to secondary market trading risks. In addition, an ETF may not replicate exactly the performance of the index it seeks to track for a number of reasons, including transaction costs incurred by the ETF, the temporary unavailability of certain securities in the secondary market, or discrepancies between the ETF and the index with respect to weighting of securities or number of securities held.
- *Management risk*, which is the risk that the investment techniques and risk analyses applied by Landing Point may not produce the desired results and that legislative, regulatory, or tax developments, affect the investment techniques available to Landing Point. There is no guarantee that a client's investment objectives will be achieved.
- *Real estate risk*, which is the risk that an investor's investments in Real Estate Investment Trusts ("REITs") or real estate-linked derivative instruments will subject the investor to risks similar to those associated with direct ownership of real estate, including losses from casualty or condemnation, and changes in local and general economic conditions, supply and demand, interest rates, zoning laws, regulatory limitations on rents, property taxes and operating expenses. An investment in REITs or real estate-linked derivative instruments subject the investor to management and tax risks.
- *Investment companies ("Mutual Funds") risk*, when an investor invests in mutual funds, the investor will bear additional expenses based on his/her pro rata share of the mutual fund's operating expenses,

including the management fees. The risk of owning a mutual fund generally reflects the risks of owning the underlying investments the mutual fund holds.

- *Commodity risk*, generally commodity prices fluctuate for many reasons, including changes in market and economic conditions or political circumstances (especially of key energy-producing and consuming countries), the impact of weather on demand, levels of domestic production and imported commodities, energy conservation, domestic and foreign governmental regulation (agricultural, trade, fiscal, monetary and exchange control), international politics, policies of OPEC, taxation and the availability of local, intrastate and interstate transportation systems and the emotions of the marketplace. The risk of loss in trading commodities can be substantial.
- *Cybersecurity risk*, which is the risk related to unauthorized access to the systems and networks of Landing Point and its service providers. The computer systems, networks and devices used by Landing Point and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach. Cybersecurity breaches can include unauthorized access to systems, networks or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow or otherwise disrupt operations, business processes or website access or functionality. Cybersecurity breaches cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or other compliance costs; as well as the inadvertent release of confidential information. Similar adverse consequences could result from cybersecurity breaches affecting issues of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers and other financial institutions; and other parties. In addition, substantial costs may be incurred by those entities in order to prevent any cybersecurity breaches in the future.
- *Alternative investments/private funds risk*, investing in alternative investments is speculative, not suitable for all clients, and intended for experienced and sophisticated investors who are willing to bear the high economic risks of the investment, which can include:
  - loss of all or a substantial portion of the investment due to leveraging, short-selling or other speculative investment practices;
  - lack of liquidity in that there may be no secondary market for the investment and none expected to develop;
  - volatility of returns;
  - restrictions on transferring interests in the investment;
  - potential lack of diversification and resulting higher risk due to concentration of trading authority when a single adviser is utilized;
  - absence of information regarding valuations and pricing;
  - delays in tax reporting;
  - less regulation and higher fees than mutual funds;
  - risks associated with the operations, personnel, and processes of the manager of the funds investing in alternative investments.
- *Closed-end funds risk*, Closed-end funds typically use a high degree of leverage. They may be diversified or non-diversified. Risks associated with closed-end fund investments include liquidity risk, credit risk, volatility and the risk of magnified losses resulting from the use of leverage. Additionally, closed-end funds may trade below their net asset value.

Clients are advised that they should only commit assets for management in the Program that can be invested for the long term, that volatility from investing can occur, and that all investing is subject to risk. Landing Point does not guarantee the future performance of a client's portfolio, as investing in securities involves the risk of loss that clients should be prepared to bear.

Past performance of a security or a fund is not necessarily indicative of future performance or risk of loss.

#### Use of External Managers

Landing Point may select certain External Managers to manage a portion of its clients' assets. In these situations, the success of such recommendations relies to a great extent on the External Managers' ability to successfully implement their investment strategies. In addition, Landing Point generally may not have the ability to supervise the External Managers on a day-to-day basis.

#### **F. Voting Client Securities**

Landing Point does not accept the authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for all and any securities maintained in client Program portfolios.

### **Item 7 – Client Information Provided to Portfolio Managers**

Landing Point is the primary portfolio manager under the Program. Clients participating in the Program also grant Landing Point the authority to discuss certain non-public information with the External Managers that may be engaged to manage their accounts. Depending upon the specific arrangement, the Firm may be authorized to disclose various personal information including, without limitation: names, phone numbers, addresses, social security numbers, tax identification numbers and account numbers. Landing Point may also share certain information related to its clients' financial positions and investment objectives in an effort to ensure that the External Managers' investment decisions remain aligned with its clients' best interests. This information is communicated on an initial and ongoing basis, or as otherwise necessary to the management of its clients' portfolios.

### **Item 8 – Client Contact with Portfolio Managers**

Landing Point is the primary portfolio manager under the program. No restrictions are placed on a client's ability to contact or consult with Landing Point. Clients can generally contact the External Managers managing their portfolios through Landing Point by providing the Firm with written request and identification of the questions or issues to be discussed with the External Managers. After receiving the client's written request, Landing Point, at its sole discretion, may contact the External Managers for the client or arrange for the External Managers and the client to communicate directly.

## **Item 9 – Additional Information**

### **A. Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of the adviser and the integrity of the adviser's management. Landing Point has no information applicable to this Item.

### **B. Other Financial Industry Activities and Affiliations**

#### **Related Accountants**

Certain supervised persons of the Firm are Certified Public Accountants (CPAs) and provide tax preparation and planning services to clients on a standalone basis for an additional fee. This creates a conflict of interest since the Firm and its representatives have an incentive to recommend the services of these CPAs in order to generate additional revenue for the Firm. Landing Point addresses this conflict by disclosure to clients and requiring clients to execute a separate contract if they choose to engage the CPAs for tax preparation and planning services.

### **C. Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading**

Landing Point has a Code of Ethics (the "Code") which requires Landing Point's employees ("supervised persons") to comply with their legal obligations and fulfill the fiduciary duties owed to the Firm's clients. Among other things, the Code of Ethics sets forth policies and procedures related to conflicts of interest, outside business activities, gifts and entertainment, compliance with insider trading laws and policies and procedures governing personal securities trading by supervised persons.

Personal securities transactions of supervised persons present potential conflicts of interest with the price obtained in client securities transactions or the investment opportunity available to clients. The Code addresses these potential conflicts by prohibiting securities trades that would breach a fiduciary duty to a client and requiring, with certain exceptions, supervised persons to report their personal securities holdings and transactions to Landing Point for review by the Firm's Chief Compliance Officer. The Code also requires supervised persons to obtain pre-approval of certain investments, including initial public offerings and limited offerings.

Landing Point will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **D. Review of Accounts**

While Program accounts are monitored on an ongoing basis, Landing Point's investment adviser representatives seek to have at least one annual meeting with each client to conduct a formal review of the clients' Program, and other, accounts. Program accounts are reviewed for consistency with the Program strategy and other parameters set forth for the account and to determine if any adjustments need to be made.

Other Reviews and Triggering Factors

In addition to the periodic reviews described above, reviews may be triggered by changes in a Program account holder's personal, tax or financial status. Other events that may trigger a review of an account are material changes in market conditions as well as macroeconomic and company- specific events. Clients are encouraged to notify Landing Point of any changes in his/her personal financial situation that might affect his/her investment needs, objectives, or time horizon.

Regular Reports

Written brokerage statements are generated no less than quarterly and are sent directly from the qualified custodian. These reports list the Program account positions, activity in the account over the covered period, and other related information. Clients are also sent confirmations following each brokerage account transaction unless confirmations have been waived.

Landing Point may also determine to provide account statements and other reporting to clients on a periodic basis. Landing Point also provides account reports during client meetings.

Clients are urged to carefully review all custodial account statements and compare them to any statements and reports provided by Landing Point. Landing Point statements and reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

**E. Client Referrals and Other Compensation**Economic Benefits Provided by Third Parties for Advice Rendered to Clients

Landing Point does not receive benefits from third parties for providing investment advice to clients.

Compensation to Non-Supervised Persons for Client Referrals

Landing Point may enter into agreements with individuals and organizations, some of whom may be affiliated or unaffiliated with Landing Point for the referral of clients to us. All such agreements will be in writing and comply with the applicable state and federal regulations. If a client is introduced to Landing Point by a solicitor, Landing Point will pay that solicitor a fee in accordance with the applicable federal and state securities law requirements. While the specific terms of each agreement may differ, generally, the compensation will be based upon Landing Point's engagement of new clients and the retention of those clients and would be calculated using a varying percentage of the fees paid to Landing Point by such clients until the account is closed by written authorization from the client. Any such fee shall be paid solely from Landing Point's fees, and shall not result in any additional charge to the client.

Each prospective client who is referred to Landing Point under such an arrangement will receive disclosure in accordance with the requirements of Rule 206(4)-1 under the Advisers Act. In any case, applicable state laws may require these persons to become licensed either as representatives of Landing Point or as an independent investment adviser.

**F. Financial Information**

Landing Point is not required to disclose any financial information pursuant to this item due to the following:

- a) Landing Point does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance of rendering services;
- b) Landing Point is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts; and
- c) Landing Point has never been the subject of a bankruptcy petition.