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FORM ADV PART 2 BROCHURE

This brochure provides information about the qualifications and business practices of Winning Points Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 800.950.9112. 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.

Additional information about Winning Points Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Winning Points Advisors, LLC is 118077

Winning Points Advisors, LLC 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.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated February 22, 2013, the Adviser has filed to become a federally registered investment adviser, and has filed to become investment adviser to a registered investment company, the WP Large Cap Income Plus Fund.

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Item 4 Advisory Business

Description of Services and Fees

Winning Points Advisors, LLC is a registered investment adviser based in Boca Raton, Florida. We are organized as a limited liability company under the laws of the State of Florida. We have been providing investment advisory services since 1990. Charles S. Stoll, Charles P. Stoll and Georges A. Stoll are the principal owners of our firm. Currently, we offer the following investment advisory services, which are personalized to each client:

- Asset Management Services, Including Management of Registered Investment Company Assets
- Financial Planning Services
- Selection of Other Advisers

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our" and "us" refer to Winning Points Advisors, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

Asset Management Services

Our firm provides discretionary and non-discretionary asset management services where the investment advice provided is custom tailored to meet your needs and investment objectives. Our firm also manages a registered investment company, the WP Large Cap Income Plus Fund. Accordingly, where we maintain discretion, we are authorized by you, in writing, to perform various advisory functions, at your expense, without further approval from you. Such functions may include making all investment decisions on the securities purchased or sold and the amount of securities to be purchased or sold. Once your portfolio is constructed, we will provide ongoing supervision and re-balancing of your portfolio as changes in market conditions and your circumstances may require. Where we enter into a non-discretionary arrangement with you, we will obtain your specific approval prior to the execution of a trade.

The annual fee for our portfolio management services is billed quarterly in arrears based on the average ending asset balances on a monthly basis. Fees will be assessed pro rata in the event the portfolio management agreement is executed at any time other than the first day of a calendar quarter. On an annualized basis, our fee for portfolio management services, subject to negotiation depending on your financial position and the scope of the contracted services is based on the following tiered fee schedule [the management fee for the WP Large Cap Income Plus Fund is 1.35%]:

Assets Under Management	Annual Fee*
\$0 to \$1,000,000	2.00%
\$1,000,001 to \$5,000,000	1.50%
\$5,000,001 to \$7,500,000	1.00%
\$7,500,001 and over	0.85%

*Related accounts may be aggregated for fee calculations, to the extent permitted by law. The fees and minimum account size is subject to negotiation.

Payment of fees will be made by the qualified, independent custodian holding your funds and securities provided that the following requirements are met:

- You provide written authorization permitting the fees to be paid directly from your account held by the custodian. Our firm does not have access to your funds for payment of fees without your consent in writing.
- It is disclosed to you that it is your responsibility to verify the accuracy of the fee calculation and that the custodian will not determine whether the fee is properly calculated.
- We will send an invoice to the custodian indicating only the amount of the fee to be paid by the custodian.
- The custodian agrees to send you a statement, at least quarterly, indicating all amounts dispersed from the account including the amount of the advisory fee paid directly to us.

In our sole discretion, we may allow accounts of members of the same household to be aggregated for the purpose of determining the advisory fee. We may allow such aggregation, for example, where we service accounts on behalf of minor children of current Clients, individual and joint accounts for a spouse, smaller accounts attached to a larger Client relationship, and other types of related accounts. This consolidation practice is designed to allow you the benefit of an increased asset total, which could potentially cause the account to be assessed a reduced advisory fee based on the breakpoints available in our fee schedule as previously stated. At our sole discretion, we may offset our advisory fees to the extent our Associated Persons earn commissions in their separate capacities as insurance agents.

Our firm shall never have custody of any of your funds or securities, as the services of an independent qualified custodian will be used for these asset management services. The fees charged are calculated as described above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds in your account.

Either party, upon 30 days written notice to the other, may terminate the management agreement. The management fee will be pro-rated for the quarter in which the cancellation notice was given, inclusive of the 30-day notice period and any earned, unpaid fees will be due and payable.

Financial Planning Services

Our firm engages in broad-based and structured financial planning. Such planning services typically involve providing a variety of services, principally advisory in nature, to you regarding the management of your financial resources based upon an analysis of your individual needs.

We also use a macro-economic approach to financial planning with a graphical overview. By incorporating multiple areas of finances into one system, we enable you to view how each area of personal finances works in conjunction with the other areas of personal finances. When viewed from this approach, inefficiencies may be determined. Individual areas of the planning process may be improved and as a result, you are better served. By combining this graphical overview approach with improved methods of saving, distributing and conserving assets, our planning process may lead to an overall increase in efficiency and effectiveness concerning money decisions for you, your family and heirs.

The process typically begins with an initial complementary consultation during which the various services provided by our firm are explained. If during or after the initial consultation, you decide to engage us for financial planning services, pertinent information about your personal and financial circumstances and objectives is collected. As required, we will conduct follow-up interviews for the

purpose of reviewing and/or collecting financial data. Once such information has been studied and analyzed, a written financial plan--designed to achieve your expressed financial goals and objectives--is produced and presented to you.

In some cases you may only require advice on a single aspect of the management of your financial resources. If that is the case we offer financial plans in a modular format that address only those specific areas of interest or concern, depending on your unique circumstances.

Financial planning services may be rendered in the areas of retirement planning, financial planning, personal tax and cash flow planning, estate planning, insurance planning, divorce planning, college planning, and compensation and benefits planning, among others.

Our firm utilizes the following financial planning and consulting fee schedule:

- Fixed Fees - We charge a fixed fee for broad based and structured financial planning services that ranges between \$350 and \$3,500. One-half of the estimated fee is payable upon signing the financial planning agreement with the balance due on completion of the contracted services. In no event will we charge \$500 or more six or more months in advance of services rendered.
- Hourly Fees - We charge an hourly fee of up to \$350 for individual consulting related services. The entire fee is payable at the end of the consultation. After a consultation has been conducted, the fee will not be refundable.

When the scope of the financial planning and/or consulting services has been agreed upon, a determination will be made as to applicable fee. The final fee, subject to negotiation, is directly dependent upon the facts and circumstances of your financial situation and the complexity of the financial plan or consulting service(s) requested.

Financial plans are based on your financial situation at the time the plan is presented and are based on financial information disclosed by you to our firm. You are advised that certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. We cannot offer any guarantees or promises that your financial goals and objectives will be met. If and when your financial situation, goals, objectives, or needs change, you must notify us promptly.

We reserve the right to determine whether the financial planning and/or consulting fees will be waived or offset by the advisory fees and/or additional compensation earned (commissions for securities and insurance related transactions) in the implementation process. The scope and complexity of the financial planning services that were provided will determine the waiver or offset of the fee.

You are free to act on our recommendations by placing securities transactions with any brokerage firm of your choice. You are under no obligation to act on our financial planning recommendations. Moreover, if you elect to act on any of the recommendations, you are under no obligation to implement the financial plan through an Associated Person of our firm.

Either party may terminate the agreement by providing written notice to the other. Upon termination, any prepaid fees will be prorated to the date of termination and unearned fees will be returned to you.

Recommendation of Independent Advisers

We may refer you to various third-party investment money managers ("TPMM") for asset management services. All TPMMs to whom we may refer you to must be registered investment advisers with the Securities and Exchange Commission or the appropriate state authority(ies).

After gathering information about your financial situation and investment objectives, an Associated Person of our firm may assist you in selecting a particular third-party adviser/program. We may receive compensation pursuant to its agreements with these TPMMs for introducing you to the TPMM. Such compensation may differ depending upon the individual agreement with each TPMM. Therefore, our firm or our Associated Persons may have an incentive to recommend one TPMM over another TPMM with whom it has more favorable compensation arrangements or other advisory programs offered by TPMMs with which it has no compensation arrangements. This creates a conflict of interest. We will act in your best interests and not consider the compensation we receive when we make such referral recommendations.

We do not charge you a separate fee for the selection of other advisers. We will share in the advisory fee you pay directly to the TPMM. Fees paid by you to TPMMs are established and payable in accordance with the Form ADV Part 2 or other equivalent disclosure document provided by each TPMM to whom we refer you to, and may or may not be negotiable. If you are referred to a TPMM you will receive full disclosure, including services rendered and fee schedules, at the time of the referral, by delivery of a copy of the relevant TPMM's Form ADV Part 2 or equivalent disclosure document. In addition, if the investment program recommended to you is a wrap fee program, you will also receive the Appendix 1 or equivalent wrap fee brochure provided by the sponsor of the program. Our firm or the TPMM will provide to you all appropriate disclosure statements as required by the Securities and Exchange Commission Rule 206(4)-3.

You may be required to sign investment advisory agreements with both our firm and directly with the TPMM of the program selected. You, our firm or TPMM, in accordance with the provisions of those agreements, may terminate the advisory relationship.

Types of Investments

We may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Assets Under Management

As of October 1, 2013, we manage \$96,000,000 in client assets on a discretionary basis.

Item 5 Fees and Compensation

Refer to the *Advisory Business* section above for additional disclosures on our fees and compensation.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through which your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To

fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Disclosure Brochure.

Compensation for the Sale of Other Investment Products

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

At our sole discretion, we may offset our advisory fees to the extent our Associated Persons earn commissions in their separate capacities as insurance agents.

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

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of 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. Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, investment companies, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to effectively manage.

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

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

- **Charting Analysis** - involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends.
- **Fundamental Analysis** - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

- Long Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.
- Short Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.
- Option Writing - a securities transaction that involves selling an option. An option is the right, but not the obligation, to buy or sell a particular security at a specified price before the expiration date of the option. When an investor sells an option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. The seller pays the buyer a premium (the market price of the option at a particular time) in exchange for writing the option.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Charting Analysis - The risk of market timing based on technical analysis is that charts may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Fundamental Analysis - The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets. Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Custodians will default to the FIFO accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

As disclosed under the "Advisory Business" section in this Brochure, we recommend all types of securities and we do not necessarily recommend one particular type of security over another. Since each client has different needs and different tolerance for risk. Each type of security has its own unique

set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Item 9 Disciplinary Information

Winning Points Advisors, LLC has been registered and providing investment advisory services since 1990. Neither our firm nor any of our associated persons has any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

Persons providing investment advice on behalf of our firm are licensed as insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. Refer to the *Fees and Compensation* section in this Brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

Charles S. Stoll is also the sole owner of Fortune Press Publishers, Inc., a Florida corporation which publishes books, some of which Mr. Stoll has authored or co-authored, and offers on a wide range of topics. Fortune Press Publishers' office is located within the offices of our firm in Boca Raton, Florida. Charles S. Stoll receives compensation as author of those books. We may receive compensation in part due to the sale of the books and/or the implementation of the ideas or concepts as delineated therein.

Recommendation of Other Advisers

We may recommend that you use a third party money manager ("TPMM") based on your needs and suitability. We will receive compensation from the TPMM for recommending that you use their services. These compensation arrangements present a conflict of interest because we have a financial incentive to recommend the services of the third party adviser. You are not obligated, contractually or otherwise, to use the services of any TPMM we recommend.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Our Code of Ethics also requires that certain persons associated with our firm submit reports of their personal account holdings and transactions to a qualified representative of our firm who will review these reports on a periodic basis. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Charles S. Stoll at 561.367.9111.

Participation or Interest in Client Transactions

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

We generally recommend the brokerage and custodial services of TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), a securities broker-dealer and a member of the Financial Industry Regulatory Authority, the Securities Investor Protection Corporation, and the National Futures Association. We believe that TD Ameritrade provides quality execution services for your account at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by TD Ameritrade, including the value of research provided the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of research services and additional brokerage products and services we receive from TD Ameritrade, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We participate in the TD Ameritrade Institutional program through which we receive some benefits from TD Ameritrade. There is no direct link between our participation in the program and the investment advice we provide to you, although we do receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to our firm by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our associated persons. Some of the products and services made available by TD Ameritrade through the program may benefit our firm and/or associated persons but may not benefit you or your accounts. These products or services may assist our firm in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits we receive through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duty to clients, we endeavor at all times to put the interests of our clients first. You should be aware; however, that the receipt of economic benefits by our firm or our associated persons itself creates a conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

The products and services we receive from TD Ameritrade will generally be used in servicing all of our clients' accounts. Our use of these products and services will not be limited to the accounts that paid commissions to the broker-dealer for such products and services.

For the management of sub-accounts of variable products we will use the services of *Jefferson National Securities Corporation*.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

We routinely recommend that you direct our firm to execute transactions through TD Ameritrade. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

Block Trades

We combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13 Review of Accounts

Your account is reviewed periodically by determining price actions and news, which may affect securities prices. Charles S. Stoll, Managing Member, will conduct all reviews. Additional reviews may be provided at your request, or based on a life changing event such as retirement, child birth, and/or job promotion/loss.

We encourage periodic reviews of your progress with your financial plan. Updates to the written financial plan may be provided in conjunction with the review. Such reviews and updates may be subject to our then current hourly rate. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s).

Item 14 Client Referrals and Other Compensation

We may directly compensate non-employee (outside) consultants, individuals, and/or entities (Solicitors) for client referrals. In order to receive a cash referral fee from our firm, Solicitors must comply with the requirements of the jurisdictions in which they operate. If you were referred to our firm by a Solicitor, you should have received a copy of this brochure along with the Solicitor's disclosure statement at the time of the referral. If you become a client, the Solicitor that referred you to our firm will receive a percentage of the advisory fee you pay our firm for as long as you are a client with our firm, or until such time as our agreement with the Solicitor expires or a one-time, flat referral fee upon your signing an advisory agreement with our firm. You will not pay additional fees because of this referral arrangement. Referral fees paid to a Solicitor are contingent upon your entering into an advisory agreement with our firm. Therefore, a Solicitor has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.

Solicitors that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements. We request that our Solicitors disclose to you whether multiple referral relationships exist and that comparable services may be available from other advisers for lower fees and/or where the Solicitor's compensation is less favorable.

Item 15 Custody

We directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact Charles S. Stoll, Managing Member, at 561.367.9111.

Item 16 Investment Discretion

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a power of attorney, and/or trading authorization forms.

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Refer to the *Advisory Business* section in this Brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s).

Item 17 Voting Client Securities

Proxy Voting

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Item 18 Financial Information

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$ 500 in fees and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will never sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact us at 561.367.9111, if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.

Charles S. Stoll, CPA, CFP®, PFS
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October 1,
2013

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Charles S. Stoll that supplements the Winning Points Advisors, LLC brochure. You should have received a copy of that brochure. Please contact us at 800.950.9112 if you did not receive Winning Points Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

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

Item 2 Educational Background and Business Experience

Charles Sutcliffe Stoll, CPA, CFP®, PFS

Year of Birth: 1955

- Stetson University, DeLand, FL, B.B.A in accounting. 1977.

Business Background for the Previous Five Years:

- Winning Points Advisors, LLC, Managing Member, 08/1989 to Present.
- LPL Financial Corporation, Registered Representative, 09/2009 - 05/2011
- Mutual Service Corporation, Registered Representative, 06/1989 to 09/2009.
- Fortune Press Publishers, Inc., Owner/Author, 04/1996 to Present.

Certifications:

- **Certified Public Accountant** - CPA: Education Requirements: A Degree in Accounting from an accredited University is required along with passing a CPA examination. Mr. Stoll does not currently practice as a CPA.

The **CERTIFIED FINANCIAL PLANNER**, CFP® and federally registered CFP® (with flame design) marks (collectively, the "CFP marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP professionals provide financial planning services at a fiduciary standard of care. This means CFP professionals must provide financial planning services in the best interests of their clients.

CFP professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP certification.

- **Personal Financial Specialist ['PFS']** : This designation is issued by the American Institute of Certified Public Accountants (AICPA) and is granted to individuals who must meet all of the following prerequisites: a member of the AICPA; hold an unrevoked CPA certificate issued by a state authority; earn at least 100 points under the PFS point system; and have substantial business experience in personal financial planning related services. The candidate is required to obtain personal financial planning specific education in addition to holding a valid CPA. The candidate must take a final certification examination (proctored by the AICPA) and once issued the individual must undergo Continuing Education in the form of 60 PFS points in personal financial planning experience as well as qualified 'life-long learning' activities every three years.

Item 3 Disciplinary Information

Mr. Stoll does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Mr. Stoll is separately licensed as an independent insurance agent. In this capacity, he/she can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Stoll for insurance related activities. This presents a conflict of interest because Mr. Stoll may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm. Advisory fees may be offset to the extent that commissions are earned from the sale of insurance products.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Stoll's receipt of additional compensation as a result of his activities as a licensed insurance agent.

Refer to the *Fees and Compensation* section and the *Client Referrals and Other Compensation* section of Winning Points Advisors, LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

Charles S. Stoll, is a Principal and the Managing Member of Winning Points Advisors, LLC. As such he is responsible for supervising the activities of our firm. Our firm has developed Written Supervisory Policies and Procedures which we follow that address his supervisory responsibilities including periodically reviewing investment recommendations, trades and communications with clients. Mr. Stoll can be reached at 800.950.9112.

John T. Brandt
CRD# 28925

Winning Points Advisors, LLC

129 NW 13 th Street
Suite D - 26
Boca Raton, FL 33431

Telephone: 800.950.9112

October 1,
2013

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about John Brandt that supplements the Winning Points Advisors, LLC brochure. You should have received a copy of that brochure. Please contact us at 800.950.9112 if you did not receive Winning Points Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

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

Item 2 Educational Background and Business Experience

John T. Brandt

Year of Birth: 1943

Formal Education After High School:

- Notre Dame University, Notre Dame, Indiana, BBA, 1965.

Business Background for the Previous Five Years:

- Winning Points Advisors, LLC, Investment Adviser Representative, 02/2000 to Present.
- LPL Financial Corporation, Registered Representative, 09/2009 - 05/2011.
- Mutual Service Corporation, Registered Representative, 02/2000 to 09/2009.

Item 3 Disciplinary Information

Mr. Brandt does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Mr. Brandt does not receive any additional compensation for providing advisory services beyond the compensation he receives through Winning Points Advisors, LLC.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Brandt's receipt of additional compensation as a result of his activities as a licensed insurance agent.

Refer to the *Fees and Compensation* section and the *Client Referrals and Other Compensation* section of Winning Points Advisors, LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

Charles S. Stoll, is a Principal and the Managing Member of Winning Points Advisors, LLC. As such he is responsible for supervising the activities of our firm. Our firm has developed Written Supervisory Policies and Procedures which we follow that address his supervisory responsibilities including periodically reviewing investment recommendations, trades and communications with clients. Mr. Stoll can be reached at 800.950.9112.

Robert Gearing

CRD# 873841

Winning Points Advisors, LLC

129 NW 13 th Street

Suite D - 26

Boca Raton, FL 33431

Telephone: 800.950.9112

**October 1,
2013**

**FORM ADV PART 2B
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Robert Gearing that supplements the Winning Points Advisors, LLC brochure. You should have received a copy of that brochure. Please contact us at 800.950.9112 if you did not receive Winning points Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

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

Item 2 Educational Background and Business Experience

Robert Edward Gearing II

Year of Birth: 1957

Formal Education After High School:

- Rutgers University, New Brunswick, N.J., B.A, History, 1979.

Business Background for the Previous Five Years:

- Winning Points Advisors, LLC, Investment Adviser Representative, 04/2010 to Present.
- LPL Financial Corporation, Registered Representative, 05/2010 - 05/2011.
- Kiley Partners, Inc., Registered Representative, 10/2009 - 12/2009.
- Mutual Service Corporation, Registered Representative, 03/1989 to 09/2009.

Item 3 Disciplinary Information

Mr. Gearing does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Mr. Gearing does not receive any additional compensation for providing advisory services beyond the compensation he receives through Winning Points Advisors, LLC.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Gearing's receipt of additional compensation as a result of his activities as licensed insurance agent.

Refer to the *Fees and Compensation* section and the *Client Referrals and Other Compensation* section of Winning Points Advisors, LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

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