

Item 1: Cover Page

Twin Point Capital LLC

**860 Washington Street
New York, NY 10014**

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This Brochure provides information about the qualifications and business practices of Twin Point Capital LLC. If you have any questions about the contents of this brochure, please contact Twin Point Capital LLC's Chief Compliance Officer ("**CCO**") Hamish Burt at (347) 594-5598 or by email at hb@twinpointcap.com.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("**SEC**") or by any state securities authority. Additional information about Twin Point Capital LLC is also available on the SEC's website at: www.adviserinfo.sec.gov.

Twin Point Capital LLC's registration as an investment adviser does not imply that any of its principals or employees possess a particular level of skill or training in the investment advisory business or any other business.

Item 2: Material Changes

There have been the following material changes to this Brochure since its last annual filing on March 21, 2016:

1. The Firm now provides investment advice to clients as detailed in Item 4 of this Brochure.
2. Information regarding fees associated with investment advice the Firm provides appears in Items 5 and 6 of this Brochure
3. Item 10 of this Brochure discloses the Firm's financial industry affiliation with TPC Broadband Investors GP, LLC, the General Partner of the TPC Broadband Investors, LP the fund the Firm advises.
4. Item 15 of this Brochure discloses that the Firm has custody of the assets of TPC Broadband Investors, LP as its affiliate acts as the General Partner.

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Item 4 - Advisory Business

Twin Point Capital LLC, a Delaware limited liability company ("**Twin Point**" or the "**Firm**"), was founded in August 2015. 29 Street LLC ("**29 Street**") is the sole owner of Twin Point. 29 Street is wholly owned by LG Capital Investors LLC, which in turn is 100% owned by Mr. Lawrence Guffey. Twin Point currently offers discretionary investment advisory services to TPC Broadband Investors, LP, a Delaware limited partnership ("**TPC Broadband**"). TPC Broadband Investors GP, LLC is a Delaware limited liability company and is the general partner of TPC Broadband (the "**General Partner**"). Mr. Guffey owns a controlling interest in the General Partner. The services provided to TPC Broadband are in accordance with the investment management agreement (the "**IMA**") with Twin Point.

In addition to providing discretionary investment advisory services to TPC Broadband, the Firm also provides non-discretionary investment advisory services to a family office and certain of Mr. Guffey's individual investment accounts (the "**Proprietary Accounts**"). As of February 28, 2017, Twin Point had RAUM of approximately \$92,440,189. \$42,305,294 are non-discretionary assets in the Proprietary Accounts and \$50,134,895 of discretionary assets in TPC Broadband.

In addition to the above, Twin Point intends on offering investment advisory services to investment vehicles including private funds, (collectively with TPC Broadband referred to as the "**Funds**"). For the Funds, the Firm will invest primarily in equity interests of privately held companies.

Item 5 - Fees and Compensation

Fees and Expenses

TPC Broadband pays a management fee of 1.75% of invested capital. These fees are payable in advance semi-annually. In addition, TPC Broadband is liable for certain fund expenses such as legal and audit fees. Twin Point also charges a monthly fixed fee to TPC Broadband Holdings, LLC, an affiliate of TPC Broadband, which remains in effect for eighteen months beginning September 2016. For more details about this fee arrangement, please refer to the offering documents for TPC Broadband. Such fee may be waived or altered for specific investors.

Twin Point charges the Proprietary Accounts fixed fees for the management of those accounts which are paid annually in arrears.

Item 6 - Performance Fees

An affiliate of Twin Point may receive an apportioned incentive interest distribution (the "**Incentive Interest Fee**") from investors in the investment vehicles it advises (the "**Investors**"). The affiliate, in its own discretion, may waive or reduce the Incentive Interest Fee for specific investors. Compensation based on performance will only be charged in accordance with the provisions of Rule 205-3 under the Advisers Act, whereby each Investor that is charged an Incentive Interest Fee must be a "qualified client."

Item 7 - Types of Clients

Clients of the Firm will be Funds that meet the exclusion from the definition of an investment company under Section 3(c)(7) of the Investment Company Act of 1940 and the Proprietary Accounts.

Item 8 - Methods of Analysis, Sources of Information, Investment Strategies, Risk of Loss

Methods of Analysis, Sources of Information and Investment Strategy

Twin Point will provide monitoring services with respect to investments made by the Funds it will advise (the “**Portfolio Companies**”). Additionally, where appropriate, Twin Point may also provide additional support:

- serving on the board of directors or other governing body of the Portfolio Companies;
- make recommendations to the Funds with respect to any follow-on investments; make recommendations to the Funds whenever a corporate action is requested or required with respect to the Portfolio Companies, it being understood and agreed that Twin Point shall have no responsibility or authority to actually vote any security on behalf of the Funds; and
- make recommendations with respect to the timing of the sale of assets held by the Funds, including, without limitation, develop and assist in the execution of exit strategies to dispose of or otherwise monetize investments in the Portfolio Companies.

Risk of Loss

The following is a summary of certain material risks associated with Twin Point’s investment strategies. As a summary, it is inherently incomplete and does not attempt to describe all the risks associated with those strategies. More information regarding the risks associated with these investments are available in the offering documents for the Funds. Investing in securities involves a risk of loss that Investors should be prepared to bear.

Lack of Diversification

It is the intention of Twin Point to advise Funds which could each hold a single investment. As such, the investment strategy will likely not be widely diversified among sectors, industries, geographic areas or types of securities. In addition, those Funds will not be diversified among a wide range of issuers. Accordingly, the Funds may be subject to more rapid change in value than would be the case if they were required to maintain a wide diversification among companies or industry groups.

Dependence on Key Personnel

The success of the Funds depends in substantial part on the skill and expertise of the investment professionals of Twin Point. There can be no assurance that the investment professionals will continue to be employed by the Firm throughout the life of the Funds. The loss of key personnel could have a material adverse effect on an investment vehicle.

Lack of Liquidity

Due to the nature of investments made by the Funds there may not be a readily available liquidity mechanism at any particular time. As such, Investors should be aware that there may be limited opportunities for redemption during the term of the investment.

Non-U.S. Investment

Investing in non-U.S. companies which are generally denominated in non-U.S. currencies involves certain considerations comprising both risks and opportunities not typically associated with investing in U.S. companies. These considerations include changes in exchange rates and exchange control regulations, political and social instability, expropriation, imposition of foreign taxes, less liquid markets and less available information than is generally the case in the U.S., higher transaction costs, less government supervision of exchanges, brokers and issuers, greater difficulty in enforcing contractual obligations, lack of uniform accounting and auditing standards and greater price volatility.

Item 9 - Disciplinary Information

Neither Twin Point nor any of our management personnel are subject to or have in the past been subject to any criminal or civil action in any domestic or foreign court, and neither Twin Point nor any of our management personnel have been subject to any administrative proceedings before the SEC or any other state, federal or foreign financial regulatory authority.

Item 10 - Other Financial Industry Activities and Affiliations

As stated above, TPC Broadband Investors GP, LLC, an affiliate of the Firm acts as the general partner of TPC Broadband.

Twin Point, as well as its owners, principals, employees and other clients, as well as their respective affiliates and family members, may engage in business ventures and activities that are not made available to clients of Twin Point.

Twin Point may provide advice or make recommendations concerning the Portfolio Companies or other investments even where Twin Point and/or its owners, principals, employees and other clients, as well as their respective affiliates and family members, has a substantial direct or indirect interest in the transaction in question. This presents a potential conflict of interest in that the Firm is in the position to make recommendations or investment decisions that could be construed to favor its position or that of its affiliates to the potential detriment of other Fund Investors. The Firm mitigates this conflict by making investment decisions that benefit all Investors irrespective of the interests held by the General Partner or its affiliates.

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

Code of Ethics Pursuant to Rule 204A-1 of the Advisers Act

Twin Point has adopted a Code of Ethics (the “**Code**”) pursuant to Rule 204A-1 of the Advisers Act describing the high standard of business conduct and fiduciary duty to its clients, including an “**Employee Investment Policy**” for all employees. Twin Point’s Code includes policies and procedures addressing our employees’: (i) receipt and provision of gifts and entertainment; (ii) political contributions; and (iii) outside business activities including, in each case, limitations and reporting requirements. All employees must acknowledge the terms of the Code annually, or as amended. Twin Point will provide a copy of the Code to any client or prospective client upon request.

Participation/Interest in Client Transactions

Mr. Guffey has a significant personal investment in TPC Broadband and will likely have in other Funds. This presents a conflict of interest as it places the Firm in the position to make decisions that could be construed to be in the best interest of it or its affiliates as opposed to other Investors. The Firm mitigates this conflict in that all decisions are made in the best interests of all Investors, irrespective of the interests held by the Firm or its affiliates.

Personal Trading

Under the Code, execution of trades in certain personal securities by employees requires the prior written approval of Twin Point’s Chief Compliance Officer (“**CCO**”). Unless such prior written approval is required under the Code, pre-clearance generally will not be necessary in respect of trades in securities that are not included on a conflict register maintained by the CCO or that are not otherwise prohibited under the Code.

Additionally, employees are required to provide the CCO with periodic reporting relating to their trading activity and personal accounts.

Item 12 - Brokerage Practices

Twin Point does not determine the broker or dealer to be used for a purchase or sale of securities for any account that it manages, and the Firm does not determine the commission rates to be paid to a broker or dealer for securities transactions. Therefore, at this time the Firm does not have a “best execution” obligation. In addition, Twin Point does not have any formal or informal “soft dollar” arrangements.

Item 13 - Review of Accounts

Review of Accounts

Twin Point continually monitors the accounts it advises. Additionally, a review of the investments may be triggered by any significant or unexpected event.

Client Reports

Twin Point shall furnish clients and Investors with any relevant records upon request. In addition, audited financial statements for TPC Broadband are issued annually.

Item 14 - Client Referrals and Other Compensation

Twin Point does not currently utilize any third-party marketers or solicitors.

Item 15 - Custody

For purposes of Rule 206(4)-2 under the Advisers Act (the “**Custody Rule**”), Twin Point is considered to have custody over the cash and marketable securities held for TPC Broadband, as an affiliate of the Firm acts as the General Partner. Accordingly, as stated above, TPC Broadband is subject to an annual audit.

Twin Point will ensure that the audited financials are delivered to all Investors within 120 days of TPC Broadband’s fiscal year end.

Item 16 - Investment Discretion

Twin Point has been appointed to provide discretionary investment advisory services to TPC Broadband.

Item 17 - Voting Client Securities

Twin Point does not expect to participate in any proxy voting with respect to any investment. However, Twin Point may provide recommendations to the Funds whenever a corporate action is requested or required with respect to the Portfolio Companies.

Item 18 - Financial Information

Twin Point does not currently have any financial commitment that impairs the Firm’s ability to meet contractual and fiduciary commitments to the Funds it advises or expects to advise, and has not been the subject of a bankruptcy proceeding.