



Brenton Point Wealth Advisors LLC

900 Third Avenue

New York, NY 10022

212-451-1400

www.brentonpoint.com

FORM ADV PART 2A

Brochure

March 1, 2017

This brochure provides information about the qualifications and business practices of Brenton Point Wealth Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (212) 451-1400.

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. Brenton Point Wealth Advisors LLC is registered with the SEC as an investment adviser. SEC registration does not imply any level of skill or training.

Additional information about Brenton Point Wealth Advisors LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

BPWA (as defined in Item 4 below) is a newly registered investment adviser, and this is BPWA's initial Form ADV Part 2A. As such, there are no material changes to report in this Item 2 because there has been no prior Form ADV Part 2As filed for BPWA.

Item 3 – Table of Contents

Item 1 – Cover Page.....	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	5
Item 6 – Performance-Based Fees and Side-By-Side Management	5
Item 7 – Types of Clients.....	6
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	6
Item 9 – Disciplinary Information	8
Item 10 - Other Financial Industry Activities and Affiliations.....	9
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading.....	9
Item 12 – Brokerage Practices	10
Item 13 – Review of Accounts	10
Item 14 – Client Referrals and Other Compensation	10
Item 15 – Custody	10
Item 16 – Investment Discretion	10
Item 17 – Voting Client Securities.....	11
Item 18 – Financial Information.....	11

Item 4 – Advisory Business

Who We Are

Brenton Point Wealth Advisors LLC (hereinafter “BPWA” or “Advisor” or “We” or “Us”) is a private wealth management company that was founded in 2016 and is headquartered in New York, NY. At the time of the filing of this Form ADV Part 2A, BPWA does not manage any client assets but expects to begin managing client assets shortly after its registration as an SEC registered investment adviser becomes effective. We expect to manage money for wealthy families and individuals as well as foundations, endowments, charitable organizations and other business or family related entities. BPWA’s principal owner is Brenton Point LLC, whose principal owner is Joseph DiMenna.

BPWA provides discretionary and non-discretionary investment advisory, investment consulting, planning and other services. These services are tailored based on a comprehensive understanding of your unique circumstances, asset base, interests and financial goals.

We have a strategic partnership with our affiliate, Zweig-DiMenna Associates LLC (“Zweig-DiMenna”), which provides us with various services, including certain general investment market strategy guidance, and certain administrative, accounting, compliance and operational support. Zweig-DiMenna has been an investment adviser to private pooled investment vehicles for over thirty years. In some cases, our officers and employees provide services as dual employee and officers of Zweig-DiMenna. *Please see Item 10 about our dual officer/employee arrangements.*

Our Investment Management and Advisory Services

Wrap Fee Program

BPWA primarily offers its investment management services pursuant to a wrap fee program known as Brenton Point Solutions (the “Wrap Fee Program”). We offer discretionary and non-discretionary wrap fee program services through our Wrap Fee Program. The Wrap Fee Program is described in a separate Wrap Fee Program Brochure that is distributed to each client of the Wrap Fee Program and can be viewed at the SEC’s website at www.adviserinfo.sec.gov. Accordingly, the information in this Brochure is not intended to describe our Wrap Fee Program, but is designed to describe the other services that we may provide from time to time to clients. Certain of the items in this Brochure may not apply to a client whose customized services do not involve the establishment of an advisory account.

Customized Services

If you so request, we can provide you with certain financial planning services or other consulting services, including the development of a financial summary, the development of a financial management strategy, or financial reporting. We can prepare for you a financial plan based upon,

among other things, your net worth, cash flow, tax situation, expected retirement needs, employment benefit plans, current investments, and education planning.

Upon your request, we can also provide investment advice on a more limited or project-by-project basis. This may include advice on isolated areas of concern such as estate planning or valuation, retirement planning, or any other specific topic. We are available for specific consultation or administrative services regarding your personal or business financial and investment concerns. Customized Family Office Services are available based on your needs.

Employee Benefit Retirement Plan Services

We can provide advisory services to participant-directed employee retirement benefit plans. We can analyze your plan's current investment platform and assist your plan and its participants in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. We can recommend investment options to achieve your plan's objectives, provide participant education meetings, and monitor the performance of your plan's investment vehicles.

Item 5 – Fees and Compensation

Financial Planning Fees

Our fees for financial planning and similar services are negotiated with you. Our financial planning fees may be a fixed amount based upon the specific services we are providing or may be based on an hourly charge. We do not have a standard fee schedule for our financial planning services.

Employee Benefit Retirement Plan Services

Fees for Employee Benefit Retirement Plan services are negotiable and based on a number of factors including plan assets under management and the scope of the engagement. We do not have a standard fee schedule for our Employee Benefit Retirement Plan services.

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

We do not charge any performance-based fees (that is, fees based on a share of capital gains on or capital appreciation of your assets) for managing your account(s).

“Side-by-side management” refers to the simultaneous management of multiple types of client accounts/investment products. As a registered investment advisor, we are required to (i) disclose if we or any of our supervised persons manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee, (ii) explain the conflicts of interest that we or our supervised persons would face

by managing these accounts at the same time, such as that we or our supervised persons would have an incentive to favor accounts for which we or our supervised persons receive a performance-based fee, and (iii) describe generally how we address these conflicts.

While some of our officers and employees are officers or employees (“dual officers”) of Zweig-DiMenna (which acts as investment adviser to various private pooled investment vehicles that do charge performance-based fees), we do not expect there to be any side-by-side management of your account(s) with the funds managed by Zweig-DiMenna, and we, therefore, do not expect there to be any such conflicts of interest in managing your account(s). *Please see Items 10 and 12 below for more information regarding this matter.*

Item 7 – Types of Clients

We generally accept as clients - individuals, business or family related entities, trusts, estates, foundations, endowments, charitable organizations, and pension and profit sharing plans.

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

This Item requires us to disclose certain information regarding our methods of analysis, investment strategies and risk of loss. Since our customized services are designed to address your personal or business financial and investment concerns, it is not feasible to describe our entire process, but the following is a summary of various aspects of our general investment approach, which will not necessarily apply to our customized services to you.

If you so request, we can provide you with certain financial planning services or other consulting services, including the development of a financial summary, the development of a financial management strategy, or financial reporting. We can prepare for you a financial plan based upon, among other things, your net worth, cash flow, tax situation, expected retirement needs, employment benefit plans, current investments, and education planning.

Upon your request, we can also provide investment advice on a more limited or project-by-project basis. This may include advice on isolated areas of concern such as estate planning or valuation, retirement planning, or any other specific topic. We are available for specific consultation or administrative services regarding your personal or business financial and investment concerns. Customized Family Office Services are available based on your needs.

We can provide advisory services to participant-directed employee retirement benefit plans. We can analyze your plan’s current investment platform and assist your plan and its participants in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. We can recommend investment options to achieve your plan’s

objectives, provide participant education meetings, and monitor the performance of your plan's investment vehicles.

RISKS

Please note that some of the below risks only apply if you are a client of the Wrap Fee Program.

All investing (including investing in securities) involves a risk of loss that you should be prepared to bear. We do not guarantee or represent that our investment recommendations will be successful. We cannot assure you that our investments of your money will be profitable, and in fact, you could incur substantial losses. Your investments with us are not a bank deposit and are not insured or guaranteed by the FDIC or any other government agency, and accordingly, there is a risk of loss of principal – the risk that the value of any or all of the securities in a client's account, when sold or otherwise disposed of, may be less than the price paid for the securities.

The risks set forth below represent a general summary of the material risks involved in our investment strategies.

The asset classes in which the investments are made can perform differently from each other at any given time (as well as over the long term), so the performance of a client's account will be affected by its allocation among the various asset classes. If a client's account's strategy favors exposure to an asset class during a period when that class underperforms, this will probably have an adverse effect upon a client's account's performance.

Some of the mutual funds, exchange traded funds (ETFs), and closed-end investment companies that we may recommend include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate, government, and municipal fixed income securities, and commodities. Equity securities may include large capitalization, medium capitalization, and small capitalization stocks. Mutual funds, ETF and closed-end investment company shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

If we recommend mutual funds, ETF and closed-end investment companies that have investment strategies in the U.S. and international small capitalization and small capitalization value securities, emerging market securities, and commodity futures, you should be aware that those investment strategies are likely to involve more risks than investments in large or medium capitalization stocks. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities or TIPS) present the risk of loss of purchasing power through lower expected returns. This risk is greatest for longer-term bonds.

You should also be aware that mutual funds, ETFs and closed-end investment companies and other investment strategies may contain international securities or securities that represent shares in a foreign stock. Special risks associated with investments in foreign companies include exposure to currency fluctuations, less liquidity, less developed or less efficient trading markets, lack of comprehensive company information, political or economic instability, seizure or

nationalization of assets, imposition of taxes or repatriation restrictions and differing auditing and legal standards. The securities of issuers located in emerging markets can be more volatile and less liquid than those of issuers in more mature economies. These risks may be greater with investments in developing countries.

More information about the risks of any particular mutual fund and market sectors can be reviewed in the relevant mutual fund prospectuses.

You should also be aware that if any of our key officers or employees terminate their relationships with us, die or become otherwise incapacitated for any period of time, this may have a material adverse effect on our operations and therefore may adversely affect the investment performance of a client's account(s).

In addition, cybersecurity breaches involving us or our service providers may cause disruptions and impact business operations, potentially resulting in financial losses to you; impediments to trading; the inability of us and/or other service providers to transact business; violations of applicable privacy and other laws; as well as the inadvertent release of confidential information.

Item 9 – Disciplinary Information

As a registered investment advisor, we are required to disclose any legal or disciplinary events that would be material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. We do not have any such legal or disciplinary items to report.

Item 10 – Other Financial Industry Activities and Affiliations

Some of our officers and employees are also dual officers and employees of our affiliated entity, Zweig-DiMenna, which is also a registered investment adviser with the SEC. Zweig-DiMenna acts as the investment adviser to various private pooled investment vehicles. For example, certain of our management persons, including our Chief Executive Officer, Treasurer and Chief Compliance Officer, serve in similar capacities with Zweig-DiMenna; and our President and Chief Operating Officer is Head of Global Marketing of Zweig-DiMenna. In addition, Joseph DiMenna, who is our principal beneficial owner and Market Strategist, is the President and Managing Director and head portfolio manager for Zweig-DiMenna. Although it is not expected that any of the dual officers or Joseph DiMenna will be involved in the day to day portfolio management of our clients' accounts, both BPWA and Zweig-DiMenna have implemented policies and procedures to address any potential conflicts of interests that might arise from the foregoing situation. *Please see the Wrap Fee Program Brochure for more information regarding trade allocation policies and procedures.*

Zweig-DiMenna is registered with the Commodity Futures Trading Commission ("CFTC") as both a commodity pool operator and a commodity trading advisor, and Zweig-DiMenna is also a member of the National Futures Association ("NFA"). Certain of our management persons are registered with the NFA as associated persons of Zweig-DiMenna.

Watermark Securities, Inc. (“Watermark Securities”) is a broker-dealer of which Joseph DiMenna is the principal shareholder. Certain of our management persons are registered representatives associated with Watermark Securities. It is not expected that we will direct any portion of our clients’ securities transactions to Watermark Securities.

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

We have adopted a Code of Ethics (“Code”) pursuant to Rule 204A-1 under the Investment Advisers Act of 1940 (the “Advisers Act”) that is applicable to our employees (“Employees”). Dual officers of BPWA and Zweig-DiMenna will be subject to Code of Ethics of Zweig-DiMenna. *For further information about the Zweig-DiMenna Code of Ethics, please see the Zweig-DiMenna ADV Part 2 Brochure that can be viewed at the SEC’s website at www.adviserinfo.sec.gov.* The Code requires Employees to exercise their authority and responsibility for the benefit of clients and to refrain from activities that may conflict with the interests of clients. The Code contains policies and procedures that, among other things:

- Prohibit trading on the basis of material non-public information;
- Prohibit Employees from taking personal advantage of opportunities belonging to clients;
- Place limitations on personal trading by Employees and impose preclearance and quarterly and annual reporting obligations with respect to such trading;
- Impose standards of business conduct for all Employees;
- Require the distribution of the Code (and any amendments) to Employees and require Employees to provide a written acknowledgment of their receipt thereof;
- Require the reporting and review of Employees’ personal securities transactions.
- Require Employees to report violations of the Code to our Chief Compliance Officer; and
- Require Employees to comply with federal securities laws.

Our Chief Compliance Officer monitors compliance with these and all other aspects of the Code.

We will provide a copy of the Code to a client or prospective client upon request by telephoning us at 212-451-1400.

We generally do not (i) engage in principal transactions with our clients; (ii) cause principal trades to be effected between our affiliates and our clients; (iii) effect agency cross transactions; or (iv) engage in cross trades. If we were to consider engaging in any such transactions, our Chief Compliance Officer would review such potential transactions to assure that it achieves best execution and is priced fairly, that you are not disadvantaged by the trade and whether your account can engage in such a transaction. Principal trades and agency cross transactions will only

be permitted if your consent has been obtained in accordance with the requirements of the Advisers Act and the rules adopted thereunder.

As discussed, some of our officers and employees are also dual officers of Zweig-DiMenna, which acts as the investment adviser to various private pooled investment vehicles. It is not expected that our accounts and the Zweig-DiMenna funds would be trading in the same securities at the same time, but both we and Zweig-DiMenna have implemented review procedures to track the accounts, and shall address any potential conflicts of interests that might arise from the foregoing situation.

Item 12 – Brokerage Practices

Please see the Wrap Fee Program Brochure in regards to our Brokerage Practices for Wrap Fee Program Clients. The other services discussed in this brochure do not involve brokerage practices.

Item 13 – Review of Accounts

Please see the Wrap Fee Program Brochure in regards to our review of Wrap Fee Accounts. The services discussed in this brochure do not involve Accounts.

Item 14 – Client Referrals and Other Compensation

BPWA does not receive an economic benefit from any person who is not a client for providing investment advice or other advisory services to clients of BPWA.

Item 15 – Custody

If applicable, you should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains your investment assets. You should carefully review the account statements you receive from their custodian, and compare those statements to any account information provided by us.

Item 16 – Investment Discretion

We provide investment discretionary and non-discretionary services to our Wrap Fee Program clients. Our investment advisory agreement with a client specifies whether the client has delegated to us discretionary or non-discretionary authority over the client's account. In some cases, a client may give us discretionary authority over certain assets in the client's account and non-discretionary authority over others. The investment advisory agreement can be amended at any point during the relationship if the client wishes to change the authority that the client has given us.

When BPWA is granted discretionary authority over an account, it means that BPWA is authorized to make investment decisions of all kinds, including, but not limited to, the purchase and sale of individual securities in the account without consultation with, or direction from, the account owner(s).

Item 17 – Voting Client Securities

Please see the Wrap Fee Program Brochure in regards to our proxy voting of Wrap Fee Program Client securities. The other services discussed in this brochure do not involve voting client securities.

Item 18 – Financial Information

As a registered investment advisor, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments to you. Currently, there is no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you.