



## **SIRIUS POINT ADVISORS, INC.**

**APRIL 10, 2020**

**SIRIUS POINT ADVISORS, INC.  
PO BOX 270622  
LITTLETON, CO 80127**

This brochure provides information about the qualifications and business practices of Sirius Point Advisors, Inc. ("Sirius Point"). If you have any questions about the contents of this brochure, please contact us at 571.237.4827. 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. Sirius Point is a Registered Investment Adviser with the State of Colorado. Registration as an Investment Adviser with the United States Securities and Exchange Commission ("SEC") or any state securities authority does not imply a certain level of skill or training. Additional information about Sirius Point Advisors, Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as an IARD number. The IARD number for Sirius Point is IARD# 171342.

## ITEM 2 – MATERIAL CHANGES

### SUMMARY OF MATERIAL CHANGES

This section of the Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the SEC’s public disclosure website (IAPD) [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

*Our Firm is amending the current Investment Advisor Registration with the SEC to registration with the State of Colorado. Our Firm is amending the current registration from being an advisor to an Investment Company and registering as an advisor to a Private Fund.*

Currently, a free copy of our Brochure may be requested by contacting Stacey Russello, Chief Compliance Officer of Sirius Point at 571.237.4827. The Brochure is also available on our web site [www.epiqwest.com](http://www.epiqwest.com).

We encourage you to read this document in its entirety.

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## ITEM 4 – ADVISORY BUSINESS

This Disclosure document is being offered to you by Sirius Point Advisors, Inc. (“Sirius Point” or “Firm”) about the Private Fund offering we provide.

We are a registered investment advisor located in Littleton, Colorado. Stacey Russello is the Chief Compliance Officer and President of the Corporation.

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### PRIVATE FUND OFFERING

Sirius Point Advisors, Inc. serves as the Fund’s investment manager and General Partner (“General Partner”) to the Fund. The Firm has discretionary authority to invest the Fund’s assets. The General Partner is owned and managed by Stacey D. Russello, who is the portfolio manager for the Fund.

The Fund seeks growth and preservation of capital. The Fund seeks to achieve its investment objective primarily by investing in exchange-traded funds (“ETFs”) and secondarily in mutual funds and private limited partnerships. The Fund is a “fund of funds,” which means that, under normal circumstances, when the Fund is invested in a position, the majority of the holdings in that position are expected to be primarily in ETFs, and secondarily in mutual funds and private funds. The Fund intends to rely on the investment strategies of the General Partner (“GP”). The portfolio composition will be based upon the GP’s assessment of anticipated market direction in an attempt to outperform the S&P 500 Index before dividends. The Fund expects to invest in S&P 500 and large cap S&P sector ETFs, open-end mutual funds and private funds that predominantly hold securities in the S&P 500 Index. *More information on Strategy and Philosophy is found under Item 8 of this Brochure.*

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### WRAP FEE PROGRAMS

Our Firm does not sponsor a Wrap Fee Program.

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### ASSETS

As of April 10, 2020, assets in the Fund totaled \$19,165,671.

## ITEM 5 - FEES AND COMPENSATION

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### FEES

**Management Fee** - Under the terms of the Partnership Agreement, the General Partner will be paid a fee (the “Management Fee”) for its investment management services to the Fund equal to an annualized rate of 1.00% of the Fund’s average daily net assets. The Management Fee shall be paid on a monthly basis in arrears provided, however, that the initial period shall begin on the date the Fund commences operations and shall end on the last day of the first calendar month thereafter.

**Operating Expenses** - The Fund will be responsible for all of its ordinary operating expenses, including, without limitation, management fees and expenses, brokerage commissions, custodial fees, brokerage firm data expenses and trading platform expenses, taxes, and any and all extraordinary expenses of the Fund (including, without limitation, litigation fees of the Fund). The Fund will also be responsible for reimbursing the General Partner for any out-of-pocket expenses incurred by the General Partner on the Fund's behalf.

**Organizational Expenses** - The General Partner will be responsible for the organizational expenses related to the Offering of the Fund (including, without limitation, any legal, accounting, printing and mailing expenses related to the initial offering of the Fund).

**General Partner's Expenses** - The General Partner will be responsible for its own general overhead type expenses which are part of its day-to-day management of the Fund. These include firm registration fees, computer expenses, telecommunications expenses, travel expenses, research expenses and insurance, as applicable.

## ITEM 6 - PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

For each Performance Profit Period, ("Performance Profit Period") the Net Profits of the Fund shall be calculated, adding back any distributions of distributed net income and distributions of realized capital gains. Ten percent (10%) on the Net Profits of the Fund exceeding the annualized performance of the S&P 500 Index by 5% (also annualized) for such period will be paid to the General Partner (the "Performance Profit Fee"); provided, however, that the Performance Profit Fee shall be subject to a loss carry forward provision (the "Loss Recovery Account") - often referred to as a "high watermark" - so that no Performance Profit Fee will be paid until prior losses have been recouped. The Performance Profit Fee will only be calculated and assessed on accredited investors. The Performance Profit Fee will be calculated daily and paid each calendar quarter.

The General Partner may withdraw all or part of its Capital Account, which includes its Performance Profit Fee, at any time without notice to the Limited Partners.

Under the Performance Profit Fee arrangement, the General Partner will receive a Performance Profit Fee equal to 10% of the Net Profits of the Fund exceeding the annualized return of the S&P 500 by 5% (as such term is defined in the Partnership Agreement). The Performance Profit Fee arrangement may act as an incentive for the General Partner to cause the Fund to make investments that are riskier or more speculative than would be the case in the absence of a performance profit allocation. In addition, the total amounts received by the General Partner may be higher than those received by general partners and managers of other similar investment partnerships or for similar services.

## ITEM 7 - TYPES OF CLIENTS

The investment in the Private Fund is limited to persons who are "accredited investors" as defined under the Securities Act and, depending on the fund, "qualified purchasers" as defined in the Investment Company Act. The minimum initial contribution for individual investors to the Fund is generally \$500,000 and the minimum for subsequent contributions is \$50,000, in each case subject to the General Partner's discretion to accept subscriptions for lesser amounts. The minimum initial contribution for institutional investors to the Fund is generally \$1,000,000 and the minimum for subsequent contributions is \$100,000, in each case subject to the General Partner's discretion to accept subscriptions for lesser amounts.

## ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

### METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

The Fund seeks long term growth and preservation of capital through investment in large cap equity and market index funds. Current income is a secondary objective.

The Fund seeks to achieve its investment objective primarily by investing in exchange-traded funds (ETFs) and secondarily in mutual funds and private limited partnerships. The Fund is a "fund of funds," which means that, under normal circumstances, when the Fund is invested in a position, the majority of the holdings in that position are expected to be primarily in ETFs, and secondarily in mutual funds and private funds.

The Fund intends to rely on the investment strategies of the General Partner ("GP"). The portfolio composition will be based upon the GP's assessment of anticipated market direction in an attempt to outperform the S&P 500 Index before dividends. The Fund expects to invest in S&P 500 and large cap S&P sector ETFs, open-end mutual funds and private funds that predominantly hold securities in the S&P 500 Index.

The Fund may at times invest in a holding that has a primary objective outside of the Fund's investment objective, though the Fund expects to limit this type of holding to 20% of Fund assets. Any open-end mutual fund that the Fund may invest in will be limited to no load and institutional class shares. The General Partner may allocate the Fund's assets among a limited number of ETFs, other investment companies and private funds in order to achieve the Fund's investment objective.

The Fund expects to invest in long positions in an attempt to pursue returns in a market that is anticipated to rise. The Fund may engage in borrowing to access leverage on invested holdings. The use of leverage is intended to allow investment of the Fund's assets, as well as borrowings on assets, to pursue returns greater than the S&P 500 Index. With the use of leverage, the Fund will seek to profit from increases in the price of a security, above the costs of any borrowings used in the leveraged position, in an attempt to achieve growth of capital.

The Fund may also engage in short selling. As opposed to taking long positions in a market that is anticipated to rise, short selling, or selling short, is a technique the Fund may use to attempt to achieve positive gains from a Fund holdings' falling price in a market that is anticipated to decline. Short selling involves selling a security that has been borrowed from a third party with the intention of buying that security back at a later date to return to the third party. The Fund hopes to profit from a decline in the price of the security between the short sale value and the purchase value to achieve positive returns in a declining market.

The underlying funds in which the Fund invests may have long or short strategies. Some ETFs that may be used by the Fund have investment strategies that are designed to have a larger volatility than their underlying index, through the use of leverage and hedging strategies within the ETF itself. The Fund expects to limit investment in leveraged ETFs to 10% of the Fund's assets. Leveraged ETFs that may be used in the Fund are limited to 2X ETFs. The Fund may engage in borrowing through the use of margin on holdings that are invested only in traditional un-leveraged ETFs.

Underlying funds in which the Fund invests may have long or short strategies. Some ETFs that may be used by the Fund have investment strategies that are designed to have a larger volatility than its underlying index through the use of leverage and hedging strategies within the ETF itself. It is anticipated that the Fund will invest directly in leveraged ETFs to a limited extent under normal market conditions (0-10% of the Fund's net assets).

During periods of anticipated market growth, the Fund will seek to invest in one or more underlying funds with long strategies. The Fund may use leverage in these positions when investing in un-leveraged ETFs. During periods of anticipated market stagnation or decline, the Fund may purchase one or more underlying funds with short investment strategies that short the S&P 500 Index and large cap S&P sectors or may short S&P 500 and large cap S&P sector ETFs. The Fund may use leverage in these positions when shorting un-leveraged ETFs. A portion of the Fund may be in cash and cash equivalents awaiting investment opportunities. The Advisor may increase the level of cash and cash equivalents and money market funds to preserve capital. Although turnover is anticipated be low to moderate during less volatile market periods, during anticipated transition periods at market tops or bottoms, the Fund may trade more actively to change the Fund's portfolio allocation.

The Advisor uses a self-developed process to determine market conditions and to assist in executing the Fund's investment strategy, and a self-developed screening process to select underlying Funds in which to invest the Fund's assets. The processes include macroeconomic analysis, market timing analysis, relative valuation analysis of sectors within the S&P 500, analysis of asset allocations, anticipated total returns, and risk data.

The Advisor will sell an underlying fund when the Advisor believes it has identified a more attractive investment opportunity or when the Advisor, through its self-developed process, believes a portfolio rebalancing is desirable for the Fund. Portfolio turnover will not be a limiting factor in making investment decisions.

An investment in the Fund should not be considered a complete investment program. Whether the Fund is not an appropriate investment for an investor will depend largely on his or her financial resources and individual investment goals and objectives. Investors who engage in short-term trading or other speculative strategies and styles will not find the Fund to be an appropriate investment vehicle if they want to invest in the Fund for a short period of time.

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## **RISK OF LOSS**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Investors should be prepared to bear the potential risk of loss.

Our methods rely on the assumption that the underlying companies within our security allocations are accurately reviewed by the rating agencies and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investors should be aware that accounts are subject to the following risks:

- **MARKET RISK** - Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of securities to rise or fall. Because the value of investment portfolios will fluctuate, there is the risk that you will lose money and your investment may be worth more or less upon liquidation.
- **FOREIGN SECURITIES AND CURRENCY RISK** - Investments in international and emerging-market securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.
- **CAPITALIZATION RISK** - Small-cap and mid-cap companies may be hindered as a result of limited resources or less diverse products or services. Their stocks have historically been more volatile than the stocks of larger, more established companies.
- **INTEREST RATE RISK** - In a rising rate environment, the value of fixed-income securities generally declines, and the value of equity securities may be adversely affected.
- **CREDIT RISK** - Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and thus, impact the fund's performance.

- **SECURITIES LENDING RISK** - Securities lending involves the risk that the fund loses money because the borrower fails to return the securities in a timely manner or at all. The fund could also lose money if the value of the collateral provided for loaned securities, or the value of the investments made with the cash collateral, falls. These events could also trigger adverse tax consequences for the fund.
- **EXCHANGE-TRADED FUNDS** - ETFs face market-trading risks, including the potential lack of an active market for shares, losses from trading in the secondary markets, and disruption in the creation/redemption process of the ETF. Any of these factors may lead to the fund's shares trading at either a premium or a discount to its "net asset value."
- **PERFORMANCE OF UNDERLYING MANAGERS** - We select the mutual funds and ETFs in the asset allocation portfolios. However, we depend on the manager of such funds to select individual investments in accordance with their stated investment strategy.
- **NON-LIQUID ALTERNATIVE INVESTMENTS** - From time to time, our Firm will recommend to certain qualifying investors that a portion of such investors' assets be invested in private funds, private fund-of-funds and/or other alternative investments (collectively, "Nonliquid Alternative Investments"). Nonliquid Alternative Investments are not suitable for all our Firm's investors and are offered only to those qualifying investors for whom our Firm believes such an investment is suitable and in line with their overall investment strategy. Nonliquid Alternative Investments typically are available to only a limited number of sophisticated investors who meet the definition of "accredited investor" under Regulation D of the Securities Act of 1933, as amended (the "Securities Act"), or "qualified client" under the Investment Advisers Act of 1940, or "qualified purchaser" under the Investment Company Act of 1940. Nonliquid Alternative Investments present special risks for our Firm's investors, including without limitation, limited liquidity, higher fees and expenses, volatile performance, no assurance of investment returns, heightened risk of loss, limited transparency, additional reliance on underlying management of the investment, special tax considerations, subjective valuations, use of leverage and limited regulatory oversight. When a Nonliquid Alternative Investment invests part or all of its assets in real estate properties, there are additional risks that are unique to real estate investing, including but not limited to: limitations of the appraisal value; the borrower's financial conditions (if the underlying property has been obtained by a loan), including the risk of foreclosures on the property; neighborhood values; the supply of and demand for properties of like kind; and certain city, state and/or federal regulations. Additionally, real estate investing is also subject to possible loss due to uninsured losses from natural and man-made disasters. The above list is not exhaustive of all risks related to an investment in Nonliquid Alternative Investments. A more comprehensive discussion of the risks associated with a particular Nonliquid Investment is set forth in that fund's offering documents, which will be provided to each client subscribing to a Nonliquid Alternative Investment, for review and consideration. It is important that each potential, qualified investor carefully read each offering or private placement memorandum prior to investing.
- **LEVERAGED AND INVERSE ETFs AND MUTUAL FUNDS** - Leveraged ETF's and mutual funds, sometimes labeled "ultra" or "2x" for example, are designed to provide a multiple of underlying index's return, typically on a daily basis. Inverse products are designed to provide the opposite of the return of the underlying index, typically on a daily basis. These products are different from and can be riskier than traditional ETFs and mutual funds. Although these products are designed to provide returns that generally correspond to the underlying index, they may not be able to exactly replicate the performance of the index because of fund expenses and other factors. This is



referred to as tracking error. Continual re-setting of returns within the product may add to the underlying costs and increase the tracking error. As a result, this may prevent these products from achieving their investment objective. In addition, compounding of the returns can produce a divergence from the underlying index over time, in particular for leveraged products. In highly volatile markets with large positive and negative swings, return distortions may be magnified over time. Some deviations from the stated objectives, to the positive or negative, are possible and may or may not correct themselves over time. To accomplish their objectives, these products use a range of strategies, including swaps, futures contracts and other derivatives. These products may not be diversified and can be based on commodities or currencies. These products may have higher expense ratios and be less tax-efficient than more traditional ETFs and mutual funds.

- **RISKS ASSOCIATED WITH INVESTMENTS IN PRIVATE FUNDS** Investments in pooled investments and other investment vehicles generally are subject to legal or contractual restrictions on their resale. If the fund requests a complete or partial withdrawal of its interest in an underlying fund, the investment adviser of the underlying fund generally may, in its discretion or at the election of the fund, (i) not satisfy the fund's withdrawal request with respect to the portion of the investment's assets represented by illiquid investments until the disposition of those illiquid investments, (ii) satisfy the fund's withdrawal request with an in-kind distribution of illiquid investments (either directly or through an in-kind distribution of interests in a special purpose vehicle or other investment vehicle established to hold such illiquid investments), or (iii) in some cases, satisfy the withdrawal amount by valuing illiquid investments at the lower of cost or market or otherwise in the sole discretion of the applicable investment adviser. If the fund receives distributions in-kind from an investment, the fund may incur additional costs and risks to dispose of such assets. In addition, certain underlying funds may require maintenance of investment minimums and/or have holding periods and/or other withdrawal provisions more restrictive than those of the fund. These may include, but are not limited to, lock-ups, "side pockets," withdrawal "gates" and fees, suspensions and delays of withdrawals and other similar limitations.

## ITEM 9 - DISCIPLINARY INFORMATION

We do not have any legal, financial or other "disciplinary" item to report.

## ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Our Firm does not have any other financial industry activities nor affiliations to report.

Our Firm does not have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

Our firm nor any of its management persons are registered or have an application pending to register as a broker-dealer or a registered representative of a broker-dealer.

## ITEM 11 - CODE OF ETHICS

Our Firm and persons associated with us are allowed to invest for their own accounts, or to have a financial investment in the same securities or other investments that we recommend or acquire for your account, and may engage in transactions that are the same as or different than transactions recommended to or made for your account. This creates a conflict of interest. We recognize the fiduciary responsibility to act in your best interest and have established policies to mitigate conflicts of interest.

We have developed and implemented a Code of Ethics that sets forth standards of conduct expected of our advisory personnel to mitigate this conflict of interest. The Code of Ethics addresses, among other things, personal trading, gifts, and the prohibition against the use of inside information.

The Code of Ethics is designed to protect our investors to detect and deter misconduct, educate personnel regarding the Firm's expectations and laws governing their conduct, remind personnel that they are in a position of trust and must act with complete propriety at all times, protect the reputation of Sirius Point, safeguard against the violation of the securities laws, and establish procedures for personnel to follow so that we may determine whether their personnel are complying with the Firm's ethical principles.

We have established the following restrictions in order to ensure our Firm's fiduciary responsibilities:

- A director, officer, or employee of Sirius Point shall not buy or sell any securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No supervised employee of Sirius Point shall prefer his or her own interest to that of the advisory client. Trades for supervised employees are traded alongside client accounts.
- We maintain a list of all securities holdings of anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer/individual of Sirius Point.
- We emphasize the unrestricted right of the client to decline implementation of any advice rendered, except in situations where we are granted discretionary authority of the client's account.
- We require that all supervised employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- Any supervised employee not in observance of the above may be subject to termination.

None of our associated persons may affect for himself/herself or for accounts in which he/she holds a beneficial interest, any transactions in a security which is being actively recommended to any of our investors, unless in accordance with the Firm's procedures.

You may request a complete copy of our Code by contacting us at the address, telephone, or email on the cover page of this Part 2; ATTN: Stacey Russello, Chief Compliance Officer.

## **ITEM 12 - BROKERAGE PRACTICES**

The Fund will engage Cowen Prime Services LLC, a division of Cowen Inc. (website Cowen.com), as the Fund's prime broker (the "Prime Broker") and Pershing LLC (website Pershing.com), a subsidiary of Bank of New York Mellon, as the Fund's custodian (the "Custodian"). The General Partner, at its sole discretion, reserves the right to appoint a new Prime Broker or a new Custodian for the Fund for any reason or for no reason.

## **ITEM 13 - REVIEW OF ACCOUNTS**

Investors with assets in the Private Fund will receive a quarterly report reflecting the estimated net asset value of the investor's capital account as of the end of the quarter; investors may view balances and activity online through Nottingham, the Fund Administrator. In addition, our Firm or the third-party administrator will distribute on behalf of the Sirius Point Fund a copy of the annual audited financial statements within one hundred and twenty (120) days after fiscal year end. All reports sent by our Firm to investors are delivered electronically or by regular mail.

## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

Our firm does not accept nor receive any compensation for client referrals.

## **ITEM 15 – CUSTODY**

In our capacity as General Partner of the Private Fund, our Firm is deemed to have custody of assets managed on a discretionary basis. In order to abide by the Custody Rule, these funds are audited annually by an independent public accountant and the audited financial statements are delivered to each investor within 180 days (for “fund of funds”) of the fund’s fiscal year end. In addition, the third-party administrator for the Private Fund distributes statements at least quarterly to each of the funds’ investors.

## **ITEM 16 – INVESTMENT DISCRETION**

Our Firm has discretionary authority via the relevant organizational documents to manage the funds’ investment portfolios, without any specific limitations. Each participant investing in the Fund determines whether and how much to invest into the Fund.

## **ITEM 17 – VOTING YOUR SECURITIES**

Our Firm does not vote client proxies.

## **ITEM 18 – FINANCIAL INFORMATION**

Our Firm does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to investors. Finally, we have not been the subject of a bankruptcy petition at any time.

## **ITEM 19 – REQUIREMENT FOR STATE REGISTERED ADVISERS**

Please see Form ADV Part 2B, Item 2 regarding the Investment Advisor Representative’s formal education and business background. Please see Form ADV Part 2B, Item 4 for information regarding the Investment Advisor Representative’s other business activity along with the time spent. Sirius Point Advisors, Inc. does not assess investors a performance fee.

The Firm has not been involved in or found liable in an arbitration claim or civil, self-regulatory organization or administrative proceeding involving an investment or an investment-related business or activity.

If you have any questions, concerns or require additional information before retaining the services of our Firm, you may contact the CCO Stacey Russello at 571.237.4827.



# SIRIUS POINT

*Sirius Point For Serious Investors*

## **SIRIUS POINT ADVISORS, INC.**

**APRIL 10, 2020**

**PO BOX 270622  
LITTLETON, CO 80127**

Stacey Russello

## **2B Supplemental Brochure**

The Brochure Supplement provides information about Stacey Russello (CRD# 1780968) that supplements the Sirius Point Advisors, Inc. Brochure. You should have received a copy of the Brochure. Please contact the Chief Compliance Officer at 571.237.4827. if you did not receive Sirius Point Advisors, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Stacey Russello is available on the SEC's website at SEC Adviser Info. You can search this site by a unique identifying number, known as the CRD number listed above.

## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

“Stacey” Constance Russello

Born: 1963

Post-Secondary Education: University of Colorado – Boulder Graduated: 1985

MBA: Tulane University – New Orleans, LA Graduated: 1992

Recent Business Experience:

*Sirius Point Advisors, Inc., Investment Advisor Representative/Owner, 03/2014- Present*

## ITEM 3 - DISCIPLINARY INFORMATION

Stacey Russello has no history of any legal or disciplinary events that deems to be material to a client’s consideration of Stacey Russello to act as their investment adviser representative. FINRA’s BrokerCheck® may have additional information regarding the disciplinary history of Stacey Russello that is not included in this brochure supplement. (SEC Adviser Info - <https://adviserinfo.sec.gov/>)

## ITEM 4 - OTHER BUSINESS ACTIVITIES

Stacey Russello does provide general bookkeeping services for two small businesses. These firms are not client-related nor investment related. Less than 10% of the time is spent on these activities and less than 10% compensation is received for these activities.

## ITEM 5 - ADDITIONAL COMPENSATION

Stacey Russello does not receive any economic benefit for providing advisory services beyond the scope of Sirius Point Advisors, Inc. and business activities listed in Item 4.

## ITEM 6 - SUPERVISION

Stacey Russello is the Chief Compliance Officer of Sirius Point Advisors, Inc. Her activities are generally supervised in accordance with the Firm’s compliance procedures and Stacey Russello adheres to the policies and procedures of the Firm. Specific areas of review include transactions, account suitability and written correspondence including email, among other activities. Stacey Russello may be reached at 571.237.4827.

## ITEM 7 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Stacey Russello has not been involved in or found liable in an arbitration claim or civil, self-regulatory organization or administrative proceeding alleging damages in excess of \$2,500, involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

Stacey Russello has not been the subject of a bankruptcy petition. To the best of our ability all material conflicts of interest are disclosed regarding the Firm, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.