

V I E W P O I N T
CAPITAL MANAGEMENT

Item 1: Cover Page

March 14, 2020

Viewpoint Capital Management LLC

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This brochure provides information about the qualifications and business practices of Viewpoint Capital Management LLC. If you have any questions about the contents of this brochure, please contact us at 206-219-1410 or ryan@viewpointcapitalllc.com.

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 Viewpoint Capital Management also is available on the SEC's website at www.adviserinfo.sec.gov.

Viewpoint Capital Management is a registered investment advisor. Registration as an investment advisor does not require any particular level of skill or training.

Item 2 --- Material Changes

The following information has been updated since the last version of this Brochure (dated November 23, 2019). At that time, Viewpoint filed a new ADV to the U.S. Securities and Exchange Commission (SEC) as assets under management exceeded \$100 million. That then qualified Viewpoint to be registered with the SEC and no longer with the states as an investment adviser. As a result, the following amendments / updates include:

Item 4: Assets under management and number of accounts

Note: As Viewpoint was made effective with the SEC, our registrations with Washington and Idaho were terminated; we became “notice filers” in these states as an SEC registered investment adviser. Mr. Sawyer remains as an Investment Adviser Representative (IAR) in both WA and Idaho.

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Item 4 -- Advisory Business

Viewpoint Capital Management LLC (also referred to in this brochure as “Firm”, “Advisor”, “We”, “Us”, “Our”) is a registered investment advisor founded in 2011.

Ryan P. Sawyer is the Firm’s managing member and sole owner. Mr. Sawyer is the Firm’s Chief Compliance Officer.

Advisory Services

We provide comprehensive investment advisory services. Included are:

- Articulation of objectives and risks
- Asset allocation / recommendations
- Security selection and,
- Overall Portfolio Management with investment discretionary authority, or no discretionary authority

We develop individual investment portfolios that integrate the long-term investment goals, risk tolerance and financial objectives of our clients as described in written and verbal communications with you.

Upon establishment of your advisory account with us, we document who you are and what your investment goals and objectives are in a Client Profile. This Profile guides our investment decisions and recommendations. We then manage your account assets with your unique circumstances in mind.

We tailor our advice to you by:

- Making investment decisions (for discretionary accounts) in accordance with each Client’s profile. This means that we will determine which securities, the amount of securities and timing of transactions to make for your account based on our professional determination (as guided by your profile)
- Developing recommendations (for non-discretionary accounts); which means you must authorize each transaction prior to our placing the transaction at your broker / custodian. In addition, you need to be available to our portfolio manager during open stock market hours. If we cannot reach you, we cannot place purchase or sale orders for you

Client investment portfolios will consist of marketable securities and/or investment company securities (mutual funds or exchange traded funds (ETFS)).

Portfolios will generally contain investments from multiple asset classes based on objectives and risk tolerance of each client. When developing client investment portfolios, we employ primarily individual stocks and bonds and passively managed ETFs; we also take into consideration other asset types.

Clients may place reasonable restrictions upon the type of securities or specific securities to be purchased, sold or held in their advisory accounts. These restrictions by the client must be made in writing to Viewpoint. Any restrictions on the ability of Advisor to manage the client assets may have an adverse impact on portfolio diversification or returns.

Assets Under Management

As of December 31, 2018, we had the following assets under management include only fee-paying clients as of this date. ADV Part 1 includes all assets under management (inclusive of proprietary, non-fee-paying accounts):

Investment Discretionary Authority	\$88,798,000.00
Non-Discretionary	\$25,630,000.00
Total	\$114,428,000.00

Item 5 --- Fees and Compensation

Viewpoint charges our annual fees based on a percentage of the assets under our management. The table below is our standard advisory fee schedule. Fees are billed quarterly on the inception value of the account (pro-rated for the number of days in the quarter that services were provided). For subsequent quarters, fees are charged on the portfolio value at the quarter end (fees are charged after the service is provided).

Assets Under Management Annual Advisory Fee

\$0 - \$1,000,000	1.00%
\$1,000,001 - \$5,000,000	0.85%
\$5,000,001 +	0.70%

Fees are also documented in the written agreement we have with you. This fee schedule is negotiable based on several factors, including but not limited to:

- Number of accounts in the relationship
- Prospect of additional account assets
- Other relationships (family members)
- Others

Fee Payment: Fees are paid by “directly debiting” the fee due and payable to Viewpoint by your independent and third-party qualified custodian. This means that in the written agreement you have with us, you authorize us to calculate and then request the fee due from your custodian.

You will also authorize, in writing, your custodian to pay us the fee due when the debit request is issued.

Viewpoint will, when issuing a debit request to your custodian (Schwab), send the following information to you in a worksheet that reflects:

1. The formula used to calculate the fee;
2. The fee calculation itself;
3. The amount of assets under management on which the fee is based;
4. The time period the fee covers; and,
5. The amount of the fee due for the time period.

Direct debiting is NOT a custody of your funds or securities as those are held at Schwab, your independent and third-party qualified custodian. Note: Please verify the accuracy of our fee calculations as your custodian does not perform this task.

In addition, Viewpoint does not permit or use SLOAs – standing letters of authorizations, as currently those are considered as custody by the SEC.

Additional Fees and Costs:

Advisory fees paid to Viewpoint are separate and distinct from the fees and expenses you will pay your broker / custodian, i.e., Charles Schwab and Company (“Schwab”). The fees you will pay your broker / custodian, include but are not limited to:

- | | |
|--|---|
| ○ Commissions and transaction costs | applicable) |
| ○ 12b-1 fees on mutual funds held in your brokerage accounts | ○ IRA fees |
| ○ Sub-agent transfer fees | ○ Safekeeping fees |
| ○ SEC or Exchange fees | ○ Redemption fees, exchange or similar fees for mutual fund trades |
| ○ Wire or mail / postage costs | ○ Advisory fees and operational costs to mutual funds or ETFs by the underwriters of these securities |
| ○ Dealer mark-up or mark-downs on principal transactions | ○ Others |
| ○ Margin interest if used | |
| ○ Commissions on new issues (if | |

Fees and expenses of mutual funds or ETFs are provided via prospectus from Schwab, your custodian directly. Note that Viewpoint does not participate in these additional fees or expenses charged to Clients by Schwab, they are retained by Schwab.

Some mutual fund companies impose a redemption fee. A redemption fee is another type of fee that some funds charge their shareholders when shares are sold or redeemed within a short period of time from the purchase of the fund shares. Although a redemption fee is deducted from redemption proceeds just like a deferred sales load, it is not considered to be a sales load. Unlike a sales load, which is generally used to compensate brokers, a redemption fee is typically used to defray fund costs associated with a shareholder's redemption and is paid directly to the fund, not to a broker/ investment advisor.

In most cases, the funds will use the "first-in, first-out" (FIFO) method to determine the holding period. Under this method, the date of the redemption will be compared with the earliest purchase date of shares held in the client account. While it is not the general practice of Viewpoint to sell client securities in a period that would generate a redemption fee, it should be anticipated that Advisor might do so if:

- 1) In its opinion the sale is in the client's best financial interests, or
- 2) Fund shares must be redeemed to pay our advisory fees from the account.

A complete explanation of these charges is contained in the related investment company fund prospectus and "Statement of Additional Information" for each investment company or mutual fund. Schwab, as indicated will send you a mutual fund prospectus, or you can obtain a prospectus from the investment company (through its website or by telephone or mail).

Termination:

A portfolio management agreement may be terminated by either party with written notice delivered to the other party. Upon termination, Viewpoint will have no additional authority to manage the account assets; all transactions placed prior to termination can settle. As fees are charged in arrears, *fees due and payable to Viewpoint will be charged and deducted*. If the account was terminated prior to notification to Viewpoint, we will issue you an invoice for the balance of the fee due and payable through the date of termination. Clients may terminate the agreement within five business days from the date of the agreement without penalty.

Additional Information on Services and Fees

Family and Friends: Similar services are provided to family members or friends of Viewpoint at no fee or at fees that are lower than a non-family or friend will receive.

Valuation: Portfolio values are calculated by your Schwab, the third-party broker / custodian and not by Viewpoint. Note that Schwab, your custodian, is the official record-keeper of your account assets, profit and loss calculations and other related tax information.

Similar Services: Please be aware that similar services may be available at fees that are lower or higher than those charged by Viewpoint.

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

We do not charge advisory fees to any Client based on the capital appreciation or capital gains (i.e., performance-based fees) of any account. We charge our fees calculated on an annual basis, billed quarterly as described in Item 5 of this Brochure.

Item 7 -- Types of Clients

We provide portfolio management services to individuals, high net worth individuals, personal trusts or estates and small business owners.

We do not impose minimum requirements for opening or maintaining an account, and no minimum account size.

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

Our investment philosophy focuses on a few important themes:

- Value and tactical investing
- Inclusion of income producing securities in portfolios, and
- Diversification through global investing and non-correlation.

First and foremost, we concentrate on value investing, in which we endeavor to buy shares below their intrinsic value. This contrasts with philosophies that focus on growth investing, in which shares in companies with high growth rates would be emphasized.

On a tactical basis, we try to identify out of favor asset classes, which we believe are wrongly ignored by the crowd. We believe that low prices and pessimism go together. Likewise, assets loved by investors might well be overpriced. Efforts at intelligent contrarianism extend to regular portfolio rebalancing, which reduces exposure to asset classes favored by others and increases exposure to those currently out of favor.

Part of our focus on value investing has to do with a preference for income-producing investments. Noting that roughly half of market returns during the 20th century was due to dividend reinvestment; we believe dividend payments and dividend reinvestment are crucial. This is particularly true during periods of market weakness. In this sense, our core philosophy has a defensive character, in that we do not rely solely for returns on finding securities that appreciate; rather, we seek to be paid a share of a company's profits on a regular basis.

Finally, we also believe in diversification, not only by industry but also globally. While much of the world's market capitalization exists outside of the United States, U.S. investors continue to overweight their portfolios in US assets. We want to make sure our allocations reflect the increasingly global distribution of market value, both for growth opportunity, diversification of region and currency, and achieving lower correlation of asset price

movements. A focus on non-correlation recognizes that reducing volatility can improve risk-adjusted returns.

Our overall investment philosophy notwithstanding, each client's situation is unique, and we strive to reflect those unique characteristics in the form of objectives, risk, allocation and security selection.

Risk:

Investments in securities involve risk of loss including the possibility of losing all your initial investment as well as any unrealized gains on investments managed by Viewpoint. Securities held in your portfolio(s) or in underlying investments such as mutual funds or ETFs may underperform in comparison to the general securities markets or other asset classes.

Our strategies and security analysis methods also include their own risks. We may be incorrect in our assessments of value investing, tactical decisions or investments in foreign issuers. We access foreign issuer through the US exchanges, by using American Depositary Receipts (ADRs). Foreign shares have various risks, including currency and country specific economic risks.

The performance of your account is subject to the risk that Viewpoint's investment strategy may not produce the intended results. Your account could lose money over short periods due to short- term market movements and over longer periods. The value of a security may decline due to company specific issues, general market conditions, economic trends, or events that are not specifically related to the issuer of the security or to factors that affect an industry or industries. During a general downturn in the securities markets, multiple asset classes may be negatively affected.

In addition, the use of margin or leverage increases your potential for investment gain, and investment loss. Margin also includes an additional expense as the securities in your account are used as collateral to your broker / custodian for the margin loan. Should markets decline while we are using margin, you may be required to sell securities or contribute more capital to your account to meet the margin balances required. Performance, positive or negative is impacted by the cost of the margin loan you pay directly to your broker / custodian for the margin loan.

Item 9 -- Disciplinary Information

Neither Viewpoint Capital Management nor Ryan P. Sawyer, sole owner, is or has been involved in any civil or criminal investment-related event.

Item 10 -- Other Financial Industry Activities and Affiliations

We are not involved in any other financial industry or activity. The only business of Ryan P. Sawyer and Viewpoint Capital Management is as an investment adviser.

Item 11 -- Code of Ethics, Participation or Interest in Client Transactions

Code of Ethics

Viewpoint has adopted and implemented a Code of Ethics that is designed to promote our fiduciary obligations to Clients as required by the Investment Advisers Act of 1940 and state law. This Code of Ethics (Code) applies to all employees of Viewpoint. The goal of the Code is to establish business practices that meet our fiduciary obligations and to ensure compliance with federal law requirements that apply to our firm. Please note that Viewpoint has one employee, Ryan P. Sawyer.

The Code requires, Initial (upon hire) and annual disclosure of:

- All “reportable” security holdings (as defined in the Code) for the employee and family members living in the same household
- Brokerage accounts (as that term is defined in the Code) and all securities held in certificate or book entry form
- All members of the employee’s household
- All beneficial ownership accounts (as that term is defined in the Code)
- Quarterly reporting of all reportable security transactions during the most recent quarter within 10 days of the month following the quarter end
- Quarterly reporting of gifts (when exceeding a small or minor level) given or received

The Code also prohibits the following activity:

- Trading for any employee account, Client account or communicating any information when Viewpoint is in possession of Material, Non-Public information on any security. This prohibition (called Prohibition on Insider Trading) is in place until we can verify the information is available in the public domain (via newspapers, internet, etc.)
- The purchase of an IPO (initial public offering) of a security by any employee or beneficial ownership account of an employee; and,
- The purchase of a private placement by any employee or beneficial ownership account of an employee

Due to the size and nature of our portfolio management services, Viewpoint does not require the pre- clearance of personal security transactions by employees.

If you would like a copy of Viewpoint’s Code, please contact Ryan P. Sawyer via email or telephone at the phone number or email address on the cover page of this Brochure.

Item 12 -- Brokerage Practices

Viewpoint does not have brokerage discretionary authority. This means that we cannot and do not select a broker for your account transactions. We require each Client to evaluate the broker we recommend. We then require each Client to “direct Viewpoint” to use this broker for all your account transactions.

In determining which broker to use and to recommend, we evaluated several brokerage solutions. We recommend and use exclusively, Charles Schwab and Co., Inc. and their Advisor Service Program. Recently, Schwab and other broker dealers have decided (and announced) that they no longer charge commission charges for certain security transactions (equities, ETFs, among others). You will notice this no fee charged in your transaction confirmations you receive directly from Schwab, your third-party broker custodian.

Schwab is an independent, 3rd party qualified custodian. Viewpoint and Schwab are not affiliated or related in any way. Schwab provides services to independent investment advisers like Viewpoint through Schwab Advisor Services (a service program). Schwab is a:

- Securities broker / dealer with the Financial Industry Regulatory Authority (FINRA) and the U.S. Securities and Exchange Commission
- A member of the Securities Investors Protection Corporation (SIPC)
- A registered investment adviser with the U.S. Securities and Exchange Commission; and,
- A member of the National Futures Association (NFA) and is registered as a Commodity Trading Adviser

As a result, in recommending Schwab, Viewpoint also requests that Clients independently evaluate Schwab as your broker dealer and custodian.

Viewpoint further requires Clients to select Schwab as the broker custodian for your account assets we manage and to “direct Viewpoint to place all transactions for your accounts at Schwab.” This means that Viewpoint does not seek out other brokers or dealers for portfolio transactions, does not negotiate commissions on transactions and, as a result, best execution for your account transactions may not be achieved.

However, in evaluating Schwab, we believe that Schwab provided excellent security transaction services at reasonable commissions to all our Clients and transactions we place for Clients.

We used the following criteria to evaluate broker / custodians, including Schwab:

- Combination of execution services for transactions and no additional fee for custody
- Capability to execute, clear and settle Client transactions
- Capability to facilitate transfers and payments from or to your accounts (wire

transfers, check requests, etc.)

- Breadth of securities available for purchase or sale
- Competitiveness of services available and ability to negotiate them, including margin interest, etc.
- Reputation, financial strength and stability of the broker / custodian
- Among others

In addition, Schwab provides benefits to Viewpoint and to each of our Clients that are beneficial. These services include:

- No custodial costs to Clients of Viewpoint
- Access to institutional class shares of mutual funds at minimums that would otherwise not be accessible by Viewpoint or our Clients
- Transactions at no fee for certain participating mutual funds
- Access to an institutional trading desk (and operational support)
- Information and data, among others

Block Trading:

Viewpoint may, but is not obligated to, aggregate the transactions of multiple clients, at the same time, in the same security. Typically, Viewpoint trades client-by-client; as a result, block trading is not used very often. Block trading allows Viewpoint to create larger blocks of purchase or sale transactions, which may allow us to negotiate price with Schwab, thus fulfilling our obligation of best execution (which is not a defined term under Federal securities laws). Best execution is a concept that includes price, speed and efficiency of the transaction, commission costs and generally, the best possible transaction at the time (based on all relevant factors).

Block trading will generally apply to stocks, bonds and ETFs. As mutual funds (open ended) are traded at the previous day's Net Asset Value (or NAV), there is no real benefit to block mutual fund trades together (except for the efficiency of processing one transaction on behalf of all participating client accounts).

When block trading security transactions in equities, fixed income or ETFs, if applicable, Viewpoint creates one transaction record which identifies the gross amount to purchase or sell. If the block transaction is completed fully, each participating account is credited with their pro-rated share of the block. If there are multiple transactions executed by Schwab to fully fill the order, all executions are averaged to price; all participating Clients receive the average price.

If the transaction cannot be fully filled, all Clients will be allocated their pro-rated portion of the transaction; except smaller accounts (allocations of 100 shares or fewer) will be allocated in full, the balance of the securities will be allocated pro-rata. This saves Clients from receiving other than full round lots.

Employee trades may be blocked with those of Clients. In the case of partial fills, Employee account trades are “excluded” from the allocation until all Client transactions are completed.

We do not put the interests of Viewpoint or an Employee before those of our advisory Clients.

Item 13 -- Review of Accounts

Reviews:

All Client accounts are managed and reviewed by Ryan P. Sawyer on at least a quarterly basis with more formal reviews semi-annually. However, however, we continually monitor securities held in all Client accounts. The reviews compare / contrast security holdings, asset allocation, and investment restriction compliance with each Client’s stated investment goals, objectives and risk tolerances. We recommend at least an annual review of portfolio performance with each Client.

If you notify Viewpoint to a change in your circumstances (marriage, divorce, medical issues, birth of a child, death in the family, or other significant events), these are triggers for a review of your account and your investment goals and objectives. Additional triggers can include Client imposed restrictions such as limits on capital gains or losses (tax harvesting), among others.

Reports:

Viewpoint prepares written performance reports for Clients as part of portfolio reviews with each Client. There is no set schedule for the issuance of reports to Clients. These reports, when prepared, provide a summary of investment performance for the recent quarter, year to date and inception to date. The reports also reflect holdings, transactions and cash balances.

Clients also receive brokerage statements directly from Schwab which are the official record of your account assets, transactions, debits and credits (including fees paid to Viewpoint directly from your accounts).

These reports are typically provided monthly by Schwab, if there is activity of any kind in your account, but no less than quarterly. If you do not receive your custodial statements directly from Schwab, please let us know (or contact Schwab). In addition to custodial reports, you also receive a confirmation of each transaction we place on your behalf or as you authorize.

Item 14 -- Client Referrals and Other Compensation

Client Referrals (also called Cash Solicitation Activity):

Not applicable to Viewpoint. We do not have any arrangement with individuals, firms or other entities to introduce clients to us. We obtain all our Clients ourselves.

Other Compensation:

Schwab, the broker / custodian recommended to Clients provides (see Item 12) certain benefits to both Viewpoint and our Clients. These benefits include the following:

- A discount of \$1,000.00 for our license fee for our portfolio accounting system, Portfolio Center; a system owned by Schwab through a Schwab subsidiary, Schwab Portfolio Technologies (no longer owned by Schwab).
- Access to Client data – including statements and confirmations of transactions Data downloads into Portfolio Center
- Trade execution / aggregation
- Pricing and other market data. Viewpoint does not value portfolio securities or total portfolio values for performance calculations or our advisory fees directly debited from your account. These valuations are prepared by Schwab based on Schwab prices of all securities held in your account(s).
- Direct debiting of our advisory fees as described in Item 5
- Assistance with back office / operational functions
- Educational and technology events and information
- Technology, compliance, legal and business consulting
- Access to employee benefit providers, human capital consultants and insurance providers,
- Others

Schwab may pay us for these benefits, or discount / waive fees or arrange for third party vendors to provide the services at no cost or fees lower than we would pay separately. Often, if our assets are \$10 million or more (of Client assets at Schwab), we do not pay for these services or benefits.

As a result, there is a conflict of interest present when we recommend Schwab and require Clients to select Schwab (and direct us to place all transactions for your accounts at Schwab). The conflict is our interest in the continuation of our receipt of the benefits listed above. We mitigate this conflict by disclosing the information (and conflict) here.

Item 15 --- Custody

Even though direct debiting advisory fees is a form of custody, no investment adviser that has its fees directly debited are required to indicate in Form ADV that they have custody. This can be confusing, as directly debiting is what is called “technical custody.” Therefore, we are obligated to follow the direct debit process / procedure as described under Item 5.

In addition, we suggest that you review both the statement we send to you at the time of the debit request being sent to your custodian, to verify the accuracy of our fee calculation; Schwab as your custodian does not perform this task.

We also encourage you to carefully review their periodic account statements you receive from Schwab.

Item 16 -- Investment Discretion

In the written agreement we have with each Client, you grant us limited power of attorney to determine, without your specific consent, the securities to purchase, sell or hold for your account and the timing of the transactions.

You may impose investment, tax or other restrictions on our discretionary services; such restrictions are required in writing. These restrictions may be amended but are not implemented until reviewed and accepted by Viewpoint.

Non-Discretionary Clients must approve, on a transaction-by-transaction basis all security transactions prior to our placement of those transactions at Schwab. Approval may be via telephone, via email or fax. If you are not available to Viewpoint to approve transactions during normal market hours or days; you may miss opportunities or be subject to losses (as we cannot trade for you without your explicit consent).

Item 17 -- Voting Client Securities

Viewpoint does not vote proxies for securities held in Client accounts. Clients retain the right and responsibility to vote proxies for all securities held in your accounts.

Clients receive proxies or other materials (including corporate actions) directly from Schwab, your custodian.

Item 18 -- Financial Information

Viewpoint does not require the pre-payment of advisory fees. Our fees are charged quarterly after the services have been provided.

Form ADV Part 2 B, Brochure Supplement Item 1 – Cover Page

Ryan P. Sawyer CRD: 158899

Viewpoint Capital Management LLC

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Educational and Business Experience Year of Birth: 1971

Education:

BA, 1994, English & Philosophy, Seattle University, summa cum laude

MS, 1996, English Literature, Oxford University, with distinction, Rhodes Scholar

Business Background:

President, IA Representative, Portfolio Manager
Viewpoint Capital Management, LLC

2011 to Present

Wealth Management Advisor, AVP
Lynch

2004 to 2011 Merrill

Director, Strategic Growth; Group Product Manager
Amazon

1996 to 2001

Disciplinary History:

None (No arbitration claims; no sward or liable charge (civil, self-regulatory organization or administrative proceeding)

Other Business Activity:

None

Compensation: None Supervision:

Ryan P. Sawyer is the principal and portfolio manager / investment adviser representative of Viewpoint. As a result, he is the primary and sole supervisor of the advice and services provided to Clients of Viewpoint. Should you have any questions, please contact Ryan at the phone number on the cover page of this Brochure Supplement or via email at ryan@viewpointcapitalllc.com.

Privacy Disclosure

Viewpoint Capital Management, LLC takes the safeguarding of our Client's personal and non-public information we gather for each of our Clients.

The information we collect includes:

- Social security numbers
- Addresses
- Tax bracket, income
- Personal and family obligations
- Other information and data

We gather this information from the following sources:

- You, when filling out brokerage / custodial applications
- You, when sharing information with Viewpoint so we can tailor our portfolio management services for you
- Transactions you have executed or placed with other professionals
- Your accountants or attorney as applicable
- Others

What we do not do:

We do not share or release your personal, non-public information with any person unless:

- It is necessary to facilitate the processing of security transactions for your accounts
- It is requested by a State or Federal Governmental Agency
- You request us to do so (for example, to your other service professionals, i.e., accountant / CPA or attorney)

Protection:

We have implemented appropriate security and controls over our office space, our computer and computer systems, files, and related data capture points or recordkeeping. We maintain physical, electronic and related safeguards to protect your personal, non-public information.

If you have questions about our Privacy Disclosure or our Privacy controls, please contact Ryan P. Sawyer at ryan@viewpointcapitalllc.com.