

Vantage Point Financial, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 14, 2022

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Vantage Point Financial, LLC (“VPF” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact the Advisor at (331) 204-6212.

VPF is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about VPF to assist you in determining whether to retain the Advisor.

Additional information about VPF and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 305016.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of VPF. For convenience, we have combined these documents into a single disclosure document.

VPF believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. VPF encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 305016. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (331) 204-6212.

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Item 4 – Advisory Services

A. Firm Information

Vantage Point Financial, LLC (“VPF” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (LLC) under the laws of the State of Illinois. VPF was founded in July 2019 and is owned and operated by Nicholas J. Reiland (Managing Partner and Chief Compliance Officer) and Timothy M. Kuntz (Managing Partner). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by VPF.

B. Advisory Services Offered

VPF offers investment advisory services to individuals and high net worth individuals (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. VPF’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

VPF provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. VPF works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. VPF will then construct an investment portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize non-traded REITs, individual stocks and bonds to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy investments based on portfolio fit and/or tax considerations.

VPF’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. VPF will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

VPF evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. VPF may recommend, on occasion, redistributing investment allocations to diversify the portfolio. VPF may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. VPF may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will VPF accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Retirement Accounts – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to

another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

Use of Independent Managers – The Advisor may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide its services. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with the Client’s investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy recommendations and managing the ongoing Client relationship. The Client, prior to entering into an agreement with the Independent Manager, will be provided with the Independent Manager’s Form ADV 2A (or a brochure that makes the appropriate disclosures). As part of the Advisor’s due diligence efforts, the Advisor will also ensure the Independent Manager is properly registered or noticed file in the state in which the Client resides.

Financial Planning Services

VPF will provide a variety of financial planning and consulting services to Clients, either as a component of its investment management services or pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client’s financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings, and/or charitable giving programs.

VPF may also refer Clients to an accountant, attorney, or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

C. Client Account Management

Prior to engaging VPF to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – VPF, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.

- Asset Allocation – VPF will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – VPF will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – VPF will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

VPF does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by VPF.

E. Assets Under Management

As of December 31, 2021, VPF manages approximately \$147,002,927 in Client assets, all of which are on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

In addition, as of December 31, 2021, Advisory Persons of VFP also oversees \$45,034,720 in assets that are not under regular and continuous management of the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees range from 1.50% to 0.50% annually based on several factors, including: the complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions, and other complexities may be charged a higher fee. For Clients that utilize an Independent Manager for all or a portion of a Client's investment portfolio, the Client may be charged a lower fee by the Advisor. However, a separate asset-based fee may be charged by the Independent Manager (Please see below).

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees are negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by VPF will be independently valued by the Custodian. Should the Client have multiple accounts at the Custodian, the Advisor will bill each respective Account for its respective share of fees. VPF will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Clients fees may be amended upon thirty (30) days prior written notice to the Client except as prohibited by applicable law. From and after the effective date of the modified fee as provided in the notice, the Client shall pay the modified fee as provided in the written notice.

Use of Independent Managers – As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in

the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.50% annually.

Financial Planning Services

VPF offers financial planning services for a fixed fee ranging up to \$10,000. Fees are negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total costs will be determined prior to establishing the advisory relationship.

Clients fees may be amended upon thirty (30) days prior written notice to the client except as prohibited by applicable law. From and after the effective date of the modified fee as provided in the notice, the Client shall pay the modified fee as provided in the written notice.

B. Fee Billing

Investment Management Services

Fees are calculated based on the quarter-end security valuations as provided by the Client's designated Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with VPF at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by VPF to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Use of Independent Managers – For Client accounts implemented through an Independent Manager, the Client's overall fees may include VPF's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager[s], as applicable. In certain instances, the Independent Manager or the Advisor may assume responsibility for calculating the Client's fees and deduct all fees from the Client's account[s].

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than VPF, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by VPF are separate and distinct from these custody and execution fees.

In addition, all fees paid to VPF for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of VPF, but would not receive the services provided by VPF which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by VPF to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

VPF is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers – In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest or a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client or the Advisor and that Independent Manager. VPF will assist the Client with the termination and transition as appropriate.

Financial Planning Services

VPF requires an advance deposit as described above either by check, credit card, ACH or directly deducted from the Client account. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

VPF does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Insurance Agency Affiliations

The Advisor is affiliated through common control and ownership with Vantage Point Insurance Agency, LLC ("Vantage Point"), a licensed insurance agency. Certain Advisory Persons are also licensed insurance professionals of Vantage Point. Implementations of insurance recommendations are separate and apart from one's role with VPF. Advisory Persons and Vantage Point may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned are separate and in addition to our advisory fees. This practice presents a conflict of interest because the person providing investment advice on behalf of the Advisor, who is also an insurance agent, has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through any Advisory Person affiliated with the Advisor or Vantage Point. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

VPF does not charge performance-based fees for its investment advisory services. The fees charged by VPF are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

VPF does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

VPF offers investment advisory services to individuals, high net worth individuals, business owners and entrepreneurs. The amount of each type of Client is available on VPF's Form ADV Part 1A. These amounts may

change over time and are updated at least annually by the Advisor. VPF does not impose a minimum relationship size.

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

A. Methods of Analysis

VPF employs a fundamental analysis in developing investment strategies for its Clients. Research and analysis from VPF are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, VPF generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. VPF will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, VPF may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. VPF will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals, or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with certain components of the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e., the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e., the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e., the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e., the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e., the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e., the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Derivatives Risk

Investments in derivatives involve risks associated with the securities or other assets underlying the derivatives, as well as risks that are different or greater than the risks affecting the underlying assets. Risk unassociated with the underlying assets include the inability or unwillingness of the counterparty to perform its obligations, inability or delay in selling or closing positions, and difficulties in valuation.

Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving VPF or its management persons. VPF values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its

Advisor Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 305016.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, the Advisor is affiliated with Vantage Point and certain Advisory Persons also serve as licensed insurance professionals of Vantage Point. Implementations of insurance recommendations are separate and apart from one's role with VPF. Advisory Persons and Vantage Point will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. Certain independent managers provide the Advisor with a portion of the investment advisory fees collected by the Independent Manager from the Client. In such arrangements the Advisor has a conflict of interest as VPF also charges its own investment advisory fee for Client assets implemented with Independent Managers. VPF maintains policies and procedures to ensure recommendations to utilize an Independent Manager[s] are suitable for the Client and requires its Advisory Persons to always act in the Client's best interest.

Dual Investment Advisor Representative

Jeremy Reiland is dually-registered as an investment advisor representative with Prosperity Capital Advisors and Vantage Point Financial, LLC ("VPF"). Mr. Reiland spends approximately 70% of his business time providing services through VPF and the balance with Prosperity Capital Advisors.

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

A. Code of Ethics

VPF has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with VPF ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. VPF and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of VPF's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (331) 204-6212 or via email.

B. Personal Trading with Material Interest

VPF allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. VPF does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund or advise an investment company. VPF does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

VPF allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When

trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by VPF by requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Investment Officer ("CCO"), or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While VPF allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will VPF, or any Supervised Person of VPF, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

VPF does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize VPF to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, VPF does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where VPF does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by VPF. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. VPF may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

VPF will generally recommend that Clients establish their account[s] at TD Ameritrade, Inc. ("TD Ameritrade"), a FINRA-registered broker-dealer and member SIPC. TD Ameritrade will serve as the Client's "qualified custodian." VPF maintains an institutional relationship with TD Ameritrade, whereby the Advisor receives economic benefits from TD Ameritrade. The economic benefits received by VPF is informal soft dollar relationship. The Advisor may have an incentive to recommend a Custodian based on their institutional relationship, where they receive research or other products or services, rather than on the Clients' interest in receiving most favorable execution. For additional information regarding VPF's informal soft dollar relationship, please see Item 14 below. On an at least annual basis, the Advisor will conduct a best execution review of all their service providers. The reason for this review is to ensure that their vendors are staying on top of industry trends and are adequate based on the service offerings of the Advisor.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **VPF does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - VPF does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where VPF will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a

security into one Client account from another Client's account[s]). VPF will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian. Not all investment advisors require their Clients to direct brokerage. By directing brokerage, Clients may be unable to achieve the most favorable execution of client transactions and it may cost Clients more money.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality, and 5) skill required of the Custodian. VPF will execute its transactions through the Custodian as authorized by the Client.

VPF may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Nicholas J. Reiland, Chief Compliance Officer of VPF. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify VPF if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic, or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by VPF

Use of Independent Managers

VPF is compensated by certain Independent Managers as described in Items 5 and 10 above. In such arrangements, the Advisor has a conflict of interest as VPF also charges its own investment advisory fee for Client assets implemented with Independent Managers. VPF maintains policies and procedures to ensure recommendations to utilize an Independent Manager[s] are suitable for the Client and requires its Advisory Persons to always act in the Client's best interest.

Participation in Institutional Advisor Platform

As disclosed under Item 12, above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct

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

B. Client Referrals from Solicitors

VPF does not engage paid solicitors for Client referrals.

Item 15 – Custody

VPF does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct VPF to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by VPF to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

VPF has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by VPF. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by VPF will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

VPF does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Vantage Point Financial LLC
3030 Warrenville Road, Suite 419, Lisle, IL 60532
Phone: (331) 204-6212
www.vantagepoint-financial.com

In May of 2020, due to economic uncertainty resulting from the Coronavirus Disease 2019 (“COVID-19”), VPF applied for and received a loan from the U.S. Small Business Administration under the Paycheck Protection Program (“PPP Loan”) in order to support VPF’s ongoing operations. While the economic impact of COVID-19 on VPF’s ongoing operations have not impaired nor are they anticipated to impair, in any way, VPF’s ability to meet its contractual commitments to clients, receipt of the PPP Loan helped to ensure that certain advisory employees would not need to be furloughed. VPF received a total of \$52,742 from the PPP Loan. The proceeds of VPF’s PPP Loan are being used in accordance with the PPP Loan’s forgiveness guidelines.

Neither VPF, nor its management, have any adverse financial situations that would reasonably impair the ability of VPF to meet all obligations to its Clients. In the past ten years, neither VPF, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. VPF is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$500 or more for services to be performed six months or more in the future.

Form ADV Part 2B – Brochure Supplement

for

**Nicholas J. Reiland, CFP®, ChFC®, CEPA®
Managing Partner and Chief Compliance Officer**

Effective: March 14, 2022

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Nicholas J. Reiland, CFP®, ChFC®, CEPA® (CRD# 4340772) in addition to the information contained in the Vantage Point Financial, LLC (“VPF” or the “Advisor”, CRD# 305016) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the VPF Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (331) 204-6212.

Additional information about Mr. Reiland is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or Individual CRD# 4340772.

Item 2 – Educational Background and Business Experience

Nicholas J. Reiland, CFP®, ChFC®, CEPA® born in 1977, is dedicated to advising Clients of VPF as a Managing Partner and Chief Compliance Officer. Mr. Reiland earned a Bachelor of Arts in Finance from the University of Iowa in 2000. Additional information regarding Mr. Reiland's employment history is included below.

Employment History:

Managing Partner and Chief Compliance Officer, Vantage Point Financial, LLC	12/2019 to Present
Owner and Licensed Insurance Agent, Vantage Point Insurance Agency, LLC	12/2019 to Present
Investment Advisor Representative, Sigma Planning Corporation	01/2011 to 01/2020
Registered Representative, Sigma Financial Corporation	01/2011 to 12/2019
Financial Advisor, Ameriprise Financial Services, Inc.	01/2001 to 01/2011

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 88,000 individuals have obtained CFP® certification in the United States.

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

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

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

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Chartered Financial Consultant™ (ChFC®)

The Chartered Financial Consultant™ (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments, and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

Program Objectives:

- Function as an ethical, competent, and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning, or non-qualified deferred compensation.

Certified Exit Planning Advisor™ ("CEPA®")

The Certified Exit Planning Advisor™ and CEPA® are professional certifications marks granted by The Exit Planning Institute®. It is recognized as the designation that business owners look for when looking for a trusted advisor. CEPA® applicants must meet strict requirements, including a minimum of a bachelor's degree from an accredited U.S. college or university (or the equivalent from a foreign university); completion of the 5-day CEPA® program taught by a faculty of experts; and passing the CEPA® exam consisting of 150 multiple-choice questions. Applicants must also have five years of experience dealing with the owners of privately-held businesses in some advisory capacity. All applicants for the CEPA® program must sign an attestation agreeing to abide by the Code of Ethics and Professional Standards™ of the Exit Planning Institute.

CEPA® advisors must complete ongoing continuing professional education and ethics requirements to maintain their certification, with recertification every three years and completing 40 hours of continuing education. More information on the CEPA® designation can be found on the Exit Planning website: www.exit-planning-institute.org

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Reiland. Mr. Reiland has never been involved in any regulatory, or civil events. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Reiland.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Reiland.***

However, we do encourage you to independently view the background of Mr. Reiland on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or Individual CRD# 4340772.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Reiland serves as an owner and licensed insurance professional of Vantage Point Insurance Agency, LLC ("Vantage Point"). Implementations of insurance recommendations are separate and apart from Mr. Reiland's role with VPF. As an insurance professional and owner of Vantage Point, Mr. Reiland will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Reiland is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending

certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Reiland or the Advisor. Mr. Reiland spends approximately 20% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Reiland has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Reiland serves as a Managing Partner and Chief Compliance Officer of VPF. Mr. Reiland can be reached at (331) 204-6212.

VPF has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of VPF. Further, VPF is subject to regulatory oversight by various agencies. These agencies require registration by VPF and its Supervised Persons. As a registered entity, VPF is subject to examinations by regulators, which may be announced or unannounced. VPF is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Timothy M. Kuntz, CFP®
Managing Partner

Effective: March 14, 2022

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Timothy M. Kuntz, CFP®, (CRD# 6249476) in addition to the information contained in the Vantage Point Financial, LLC (“VPF” or the “Advisor”, CRD# 305016) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the VPF Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (331) 204-6212.

Additional information about Mr. Kuntz is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or Individual CRD# 6249476.

Item 2 – Educational Background and Business Experience

Timothy M. Kuntz, CFP®, born in 1990, is dedicated to advising Clients of VPF as a Managing Partner Mr. Kuntz earned a Bachelor of Arts in Finance from Illinois State University in 2013. Additional information regarding Mr. Kuntz's employment history is included below.

Employment History:

Managing Partner, Vantage Point Financial, LLC	12/2019 to Present
Owner and Licensed Insurance Agent, Vantage Point Insurance Agency, LLC	12/2019 to Present
Investment Advisor Representative, Sigma Planning Corporation	11/2015 to 01/2020
Registered Representative, Sigma Financial Corporation	10/2017 to 12/2019
Licensed Administrator, Upstream Investment Partners, LLC	11/2015 to 02/2018
Vice President, Welgat Law, LLC	01/2015 to 08/2017
Vice President, Welgat Wealth Management, LLC	01/2014 to 11/2015
Financial & Operations Manager, RH Financial Group, LLC	08/2013 to 01/2014

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 88,000 individuals have obtained CFP® certification in the United States.

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

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

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

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Kuntz. Mr. Kuntz has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Kuntz.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Kuntz.***

However, we do encourage you to independently view the background of Mr. Kuntz on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or Individual CRD# 6249476.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Kuntz also serves as an owner and licensed insurance professional of Vantage Point Insurance Agency, LLC. Implementations of insurance recommendations are separate and apart from Mr. Kuntz's role with VPF. As an insurance professional and owner of Vantage Point, Mr. Kuntz will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Kuntz is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Kuntz or the Advisor. Mr. Kuntz spends approximately 20% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Kuntz has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Kuntz serves as a Managing Partner of VPF and is supervised by Nicholas Reiland, the Chief Compliance Officer. Mr. Reiland can be reached at (331) 204-6212.

VPF has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of VPF. Further, VPF is subject to regulatory oversight by various agencies. These agencies require registration by VPF and its Supervised Persons. As a registered entity, VPF is subject to examinations by regulators, which may be announced or unannounced. VPF is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Jeremy R. Reiland, CFF®, CFEI
Investment Advisor Representative

Effective: March 14, 2022

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Jeremy R. Reiland (CRD# 4895169) in addition to the information contained in the Vantage Point Financial LLC ("VPF" or the "Advisor", CRD# 305016) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the VPF Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (331) 204-6212.

Additional information about Mr. Reiland is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4895169.

Item 2 – Educational Background and Business Experience

Jeremy R. Reiland, born in 1977, is dedicated to advising Clients of VPF as an Investment Advisor. Mr. Reiland studied psychology and business at the University of Iowa from 1998 to 2001. Additional information regarding Mr. Reiland's employment history is included below.

Employment History:

Investment Advisor Representative, Vantage Point Financial LLC	07/2021 to Present
President, Reiland Financial Group, Inc	09/2011 to Present
Investment Advisor Representative, Prosperity Capital Advisors	08/2011 to Present
Advisor, The Chamberlin Group	01/2011 to 06/2021

Certified Financial Fiduciary® – CFF®

The CFF® certification a professional designation provided by the National Association of Certified Financial Fiduciaries (NACFF), Charlotte, NC. To receive this designation, the individual must complete a certification and training process created by NACFF and The American Financial Education Alliance. The individual must complete a 1-day training course and pass the Program Assessment. The program educates professional advisors about the laws, rules and regulations that determine when the individual is acting as a fiduciary. 10 Annual Continuing Education Hours must be completed to renew the certification. The continuing education keeps the individual up to date on the fiduciary rules.

CERTIFIED FINANCIAL EDUCATION INSTRUCTOR

The Certified Financial Education Instructor ("CFEI") coursework meets standards for the highest academic rigor. Graduates of the coursework take their place among the most highly-qualified personal finance educators, with the ability to teach essential money management concepts effectively to people of all ages. The CFEI coursework has been accepted for Continuing Education Credits, is a Professional Designation listed on FINRA's site, and has been taught through top universities. Throughout course development, clear performance expectations were designed that now are referenced by organizations around the globe as benchmarks for financial educator standards – the Framework for Teaching Personal Finance. The Framework for Teaching Personal Finance is a research-based set of components aligned with InTASC standards and grounded in a constructivist view of learning and teaching. This Framework breaks down teaching financial literacy into 22 components recognized as best practices in the industry. To date the NFEC is the only organization to clearly define the knowledge, performance expectations, and skill sets in which financial educators should demonstrate competency.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Reiland. Mr. Reiland has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Reiland.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Reiland.***

However, we do encourage you to independently view the background of Mr. Reiland on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4895169.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Reiland is the owner and licensed insurance professional of Reiland Financial Group, Inc. Implementations of insurance recommendations are separate and apart from Mr. Reiland's role with VPF. As an insurance professional, Mr. Reiland will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Reiland is not required to offer the products of any particular

Vantage Point Financial LLC
3030 Warrenville Road, Suite 419, Lisle, IL 60532
Phone: (331) 204-6212
www.vantagepoint-financial.com

insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Reiland or the Advisor. Mr. Reiland spends approximately 20% of his time per month in this capacity.

Dual Investment Advisor Representative

Mr. Reiland is dually-registered as an investment advisor representative with Prosperity Capital Advisors and Vantage Point Financial, LLC ("VPF"). Mr. Reiland spends approximately 70% of his business time providing services through VPF and the balance with Prosperity Capital Advisors.

Item 5 – Additional Compensation

Mr. Reiland has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Reiland serves as a Investment Advisor of VPF and is supervised by Nicholas Reiland, the Chief Compliance Officer. Mr. Reiland can be reached at (331) 204-6212.

VPF has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of VPF. Further, VPF is subject to regulatory oversight by various agencies. These agencies require registration by VPF and its Supervised Persons. As a registered entity, VPF is subject to examinations by regulators, which may be announced or unannounced. VPF is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

Ronald C. Braun, CFP®
President, Farmington Hills Branch

Effective: March 14, 2022

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Ronald C. Braun (CRD# 1408917) in addition to the information contained in the Vantage Point Financial LLC ("VPF" or the "Advisor", CRD# 305016) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the VPF Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (331) 204-6212.

Additional information about Mr. Braun is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1408917.

Item 2 – Educational Background and Business Experience

Ronald C. Braun, born in 1950, is dedicated to advising Clients of VPF as the President, Farmington Hills Branch. Mr. Braun earned a BA from the University of Michigan in 1982. Mr. Braun also earned a Masters from Wayne State University in 1976. Additional information regarding Mr. Braun's employment history is included below.

Employment History:

President, Farmington Hills Branch, Vantage Point Financial LLC	02/2022 to Present
Registered Representative, Sigma Financial Corporation	04/2011 to 02/2022
Investment Advisor Representative, SPC	04/2011 to 02/2022

Certified Financial Planner™ (“CFP®”)

The Certified Financial Planner™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner™ Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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

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

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

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Braun. Mr. Braun has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Braun.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Braun.***

However, we do encourage you to independently view the background of Mr. Braun on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1408917.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Braun is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Braun's role with VPF. As an insurance professional, Mr. Braun will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Braun is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Braun or the Advisor. Mr. Braun spends approximately 10% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Braun has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Braun serves as the President, Farmington Hills Branch of VPF and is supervised by Nicholas Reiland, the Chief Compliance Officer. Mr. Reiland can be reached at (331) 204-6212.

VPF has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of VPF. Further, VPF is subject to regulatory oversight by various agencies. These agencies require registration by VPF and its Supervised Persons. As a registered entity, VPF is subject to examinations by regulators, which may be announced or unannounced. VPF is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: March 14, 2022

Our Commitment to You

Vantage Point Financial LLC ("VPF" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. VPF (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

VPF does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes VPF does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where VPF or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients VPF does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
Massachusetts	In response to Massachusetts law, the Client must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (331) 204-6212.

Vantage Point Financial LLC
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