

Item 1 - Cover Page



THREE POINTS FINANCIAL, INC.
Fee-Only, Tax Focused Financial Planning

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CRD#132897

Date of Brochure: 3/2/2023

This Brochure provides information about the qualifications and business practices of Three Points Financial, Inc., also termed “TPF” within this brochure. If you have any questions about the contents of this Brochure, please contact us at: 719-495-7163 or email at mary@threepointsfinancial.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.

Three Points Financial, Inc. is a SEC- registered investment advisor. Registration of an investment advisor does not imply any level of skill or training. The oral and written communications of an advisor provide you with information about which you determine to hire or retain an advisor.

Additional information about Three Points Financial, Inc. is available on the SEC’s website at www.Adviserinfo.sec.gov.

Item 2 - Material Changes

Since the last annual amendment of this Brochure, dated March 16, 2021, the following are material changes:

- Added employee and shareholder
- The name of the Company was changed from Alpers Financial Planning, Inc. to Three Points Financial, Inc.
- Certain investments that Three Points Financial advises on are managed on a discretionary basis.
- The firm has applied for registration with the Securities and Exchange Commission, hence Item 19, Requirements for State-Registered Advisers has been deleted
- Items 4 and 5 have been amended to update assets under management, to remove one-time financial planning services, which are not being offered, and to indicate the minimum annual fee for Open Retainer is now \$10,000.

Currently our Brochure may be requested by contacting Three Points Financial, Inc., Mary R. Alpers, 719-495-7163, mary@threepointsfinancial.com. Brochures are provided free of charge.

Additional information about TPF is available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with TPF who are registered as Investment Advisor Representatives.

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Item 4 – Advisory Business

Three Points Financial, Inc. (“TPF”) is a fee-only comprehensive financial planning firm that specializes in providing comprehensive, tax-focused financial planning and investment advisory services to individuals and families. TPF was established as an S-Corporation in May 2006 (previous name-Alpers Financial Planning, Inc.)

Firm Ownership

Mary R. Alpers (CRD#4777789) owns 85% and Steven F. Cruice Jr. owns 15%.

Firm Description

TPF offers a wide range of financial services. Specifically, TPF distinguishes itself from traditional investment advisory firms by providing comprehensive services for clients that include investment analysis, strategies, and recommendations, retirement planning, tax and estate planning, risk management, business development, rental analysis, and more. TPF holds itself to a fiduciary standard, which means we act in utmost good faith in what we believe is in the best interest of each one of our clients. As fiduciary investment advisors, we are legally required to put your interests first. We do not sell insurance or investment products, and we do not accept commissions from any product recommendations we make to you. We do not pay referral or finder’s fees, nor do we accept such fees from other firms.

As of 2/24/2023, TPF advises on approximately 115,593,365 of investment assets. Of this total, TPF advises approximately \$111,878,922 on a non-discretionary, non-custodial basis and approximately \$3,714,443 on a discretionary basis.

Currently, Mary R. Alpers, CFP® and Steven F. Cruice Jr., CFP®, CPA provide investment analysis and recommendations. TPF requires non-discretionary authority for new clients. TPF does have legacy clients that have discretionary authority. Non-discretionary authority requires TPF to obtain the Client’s prior approval of each specific transaction prior to executing investment trades, as well as for the selection and retention of sub-advisors to the account. TPF will act in accordance with a Statement of Investment Policy (or similar document used to establish the Client’s objectives and suitability) regardless of whether

authority is discretionary or non-discretionary. TPF will only execute transactions for clients when specifically requested, approved, and authorized by clients in writing (via a fully executed limited power of attorney “LPOA”) for non-discretionary clients.

TPF and the Client will enter into an agreement which details the scope of the relationship and responsibilities of both TPF and the Client. Advice and services provided under the agreement are tailored to the stated objectives of the Client(s). TPF provides the following three types of services:

1. Open Retainer: An Open Retainer provides comprehensive fiduciary financial planning for a fixed fee. Clients will have on the average six to seven meetings in the initial year, and two to four in subsequent years, depending on complexity, tax preparation, and client preference. After the first year, we renew the contract with an ongoing renewal automatic agreement, unless terminated by either the Client or TPF. In addition to scheduled meetings, additional face-to-face, e-mail and/or phone consultations are included at no additional charge. Open retainer is defined as ongoing services with reasonable availability to the Client throughout the year. Additional face to face meetings requested by the Client beyond regularly scheduled meetings are accommodated into the schedule as needed and as is reasonable.

Initial Year of Open Retainer - Scheduled meeting topics are listed below. TPF will schedule meetings to cover those topics relevant to you, such as:

- Tax preparation (if included in contract)
- Budgeting and cash flow
- Goal Setting
- Tax planning
- Inventory/Analysis of client assets, including Rental Property(ies)
- Retirement planning
- Portfolio analysis
- Develop asset allocation strategies/recommendations

- Estate planning review
- Implementation of investment recommendations upon Client request
- Small business analysis
- Insurance analysis
- Education planning
- Analysis of employee benefits

Renewal Years of Open Retainer - Typical topics covered:

- Tax planning & Tax preparation, Including Ongoing Rental Analysis
- Goal setting review (as needed)
- Investment review/Rebalancing/Recommendations
- Retirement plan updates
- Review Estate Planning periodically
- Review Insurance periodically
- Other financial planning topics (namely change of residence, business analysis)

2. Limited Retainer: If an Open Retainer relationship is not desired or practical, Limited Retainer services are also offered. Limited Retainer services are narrower in scope and usually focus on one or more of the following areas but without comprehensive retainer services: goal setting, asset/liability analysis, tax planning, cash flow management, investment review, retirement planning, risk management, estate planning and record keeping. The service includes various client consultations as well as written and/or oral recommendations resulting from such consultations. The Limited Retainer does not constitute a comprehensive financial planning engagement and follow-up advice and/or implementation assistance is not provided following the completion of the project. For the most part, oversight of client's assets is not included, although there are few exceptions for long time clients with smaller investment holdings. Additionally, tax return preparation is not automatically included with the Limited Retainer, but may be purchased as part of this service, at the Client's request and based on TPF's availability during tax season. Clients who

wish to upgrade to the Open Retainer option may receive credit toward Open Retainer fees for all amounts paid under Limited Retainer agreements for the past six months.

Item 5 – Fees and Compensation

Open Retainer

Initial and Renewal Open Retainers: \$10,000 - \$75,000

Fees are calculated upon contract initiation, payable quarterly, in advance. Fees are calculated based on the Client(s) total income, assets, and overall complexity of the Client's financial situation. Infrequent and occasional fee adjustments will occur. We do not charge specifically for assets under management.

Add-ons, credits, and miscellaneous adjustments: A charge of \$350.00 is assessed for each amended tax return prepared, if applicable. A charge of up to \$250.00 per return is assessed for additional tax returns prepared for dependents of the client. Any credits or adjustments will be determined in the sole discretion of Advisor.

Limited Retainer

Flat fee Limited Retainers are due in full at the beginning of the engagement or payable quarterly depending upon the scope of the Limited Retainer. In no event will TPF collect more than \$500.00 more than six months in advance of service provided from any Client.

Annual Limited Retainer (2 meetings/year): \$5,000 - \$15,000.

One-time Project-Oriented Limited Retainer: \$5,000 - \$15,000.

Unless specifically requested and authorized in writing by Client (with such request accepted by TPF), TPF does not execute recommendations on behalf of Clients (except for legacy clients that have discretionary asset management). Clients are responsible, but under no obligation, to implement any recommendations made by TPF.

In addition to TPF's fee, clients may incur certain other fees and charges to implement the Advisor's recommendations. Additional charges and fees will be imposed by custodians, brokers, third party investment and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to the TPF's fee. TPF seeks the best investment recommendations for the Client, including avoiding recommending investments with excessive fees and high internal costs.

Fees are generally not negotiable. The Client may terminate an engagement by providing written notice within five days of signing a retainer agreement. Additionally, either party may terminate an agreement, without penalty, at any time upon 30 days written notice. Any prepaid but unearned fees will be promptly refunded by TPF. Any fees that have been earned but not yet paid by Client will be due and payable. Whether fees have been earned or unearned will be determined by TPF's sole discretion.

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

TPF does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

TPF provides holistic financial planning and investment advisory services primarily to individuals and couples. We offer different services based on the complexity of each client's situation, including clients with small businesses and clients of moderately high net worth.

As discussed above, your chosen relationship agreement and fee will be based upon your individual circumstances.

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

The cornerstone of the TPF's investment strategy is disciplined asset allocation. Within the context of a comprehensive financial plan, TPF believes that proper asset allocation is a primary determinant of investment performance.

The main sources of information TPF may rely upon when researching and analyzing securities will include traditional research materials such as financial newspapers and magazines, annual reports, prospectuses, filings with the SEC, as well as research materials prepared by others, company press releases and corporate rating services. TPF also subscribes to various professional publications deemed to be consistent and supportive of TPF's investment philosophy.

Moreover, TPF approaches investment portfolio analysis and implementation based on internal factors such as a client's tax situation, overall risk tolerance, current financial situation, and personal goals and aspirations. After identifying these items, a client's portfolio will be structured around individual needs, while minimizing negative effects of external factors, such as interest rates, market performance, and the economy as a whole.

In general, TPF recommends no-load mutual funds (i.e., mutual funds that have no sales fees), exchange traded funds, U.S. government securities, money market accounts, certificates of deposit, and individual bonds (corporate, agency and municipal). However, in the course of providing investment advice, TPF may address issues related to other types of assets including those that you already own. Any other products that may be deemed appropriate for you will be discussed, based upon your goals, needs and objectives. TPF is a Dimensional Funds Approved Advisor. DFA Dimensional offers institutional class, no-load passively invested mutual funds.

Investing in securities involves risk of loss that clients should be prepared to bear. While TPF will use its best judgment and good faith efforts in rendering services to a client, not every investment decision or recommendation made by TPF will be profitable. TPF cannot warrant or guarantee any

particular level of account performance, or that an account will be profitable over time. The Client assumes all market risk involved and understands that investment decisions are subject to various market, currency, economic, political and business risks.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of TPF or the integrity of TPF management. TPF has no information to disclose applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Mary Alpers and Steve Cruice are members of the Alliance of Comprehensive Planners (ACP). This non-profit organization provides training and support through an alliance of fee-only comprehensive financial advisors. As a member of ACP, TPF has the right to use proprietary products and systems designed by ACP. ACP offers ongoing education in the form of in-person, web- and tele-conferences (which may provide continuing education credits) and services produced by collaborative efforts of the fee-only financial advisors.

TPF, via Mary Alpers and Steve Cruice, is a member of the National Association of Personal Financial Advisors (NAPFA), which requires that its members be fee-only and obtain a minimum of 60 continuing education credits every two years. TPF is a member the National Association of Tax Practitioners (NATP). Satisfying these continuing education requirements also satisfies educational requirements required by the CFP® Board.

TPF is a DFA Dimensional Approved Investment Advisor enabling it to offer DFA institutional class, open-ended, no-load mutual funds to clients. TPF receives no financial compensation from DFA for offering DFA Funds. TPF advisors receive on-going training and practice management support from DFA associated with the proper use of DFA Funds. TPF does not believe this support materially affects the objectivity of its investment recommendations and remains free and unencumbered to offer non-DFA investments to clients. Suitable alternative funds are recommended for clients not able to or not wishing to use DFA Funds

and most comprehensive recommendations include investments beyond strictly DFA Investment Funds. TPF's fiduciary advice includes recommendations covering a wide variety of appropriate investments based on each client's personal situation.

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

TPF seeks to avoid material conflicts of interest. Accordingly, neither TPF nor its investment adviser representatives nor its team members receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

However, some additional services and non-direct monetary or other forms of compensation may be offered and provided to TPF as a result of its relationships with custodian(s) and/or providers of mutual fund products. For example, TPF's representatives and employees may be invited to attend educational conferences and/or entertainment events sponsored by such brokerage firms or custodians or mutual fund companies. TPF believes that the services and benefits provided to it by brokerage firms (custodians) and mutual fund providers do not materially affect the investment management recommendations made to clients. However, in the interest of full disclosure of any potential conflicts of interest, we discuss the possible conflicts herein.

Although TPF believes that its business methodologies, ethics rules, and adopted policies are appropriate to eliminate potential material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain, clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. In any event, TPF will disclose to advisory clients any material conflict of interest relating to TPF, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Our Code of Ethics

TPF has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating

to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons of TPF must acknowledge the terms of the Code of Ethics annually, or as amended.

TPF has adopted the Alliance of Comprehensive Planners (ACP) Code of Ethics to which all investment advisor representatives and employees are bound to adhere. This Code of Ethics states:

TPF and its investment advisor representatives and employees pledge to be:

COMPREHENSIVE/HOLISTIC Based in outlook. We will consider all of your circumstances, family needs, goals, values, and aspirations when making recommendations.

PROFESSIONAL in conduct. We will protect your privacy. We will strive to maintain the highest ethical standards possible in our work and lives. We will continually enhance our skills and credentials through continuing education and will refer you to other professionals when you need help in an area outside our expertise.

EDUCATIONAL in nature. We will guide you through your options and explain them clearly to help you make the best choices. We will always take the time to make sure you understand our advice.

INDEPENDENT in compensation. We will never sell you a product or service other than holistic financial planning nor will we take a commission or a referral fee from another professional. You will receive objective, unbiased advice from us.

COMMITTED to your success. Comprehensive financial planning is a process, not an event, and we commit to adjusting your plan as your life goals change.

TPF also adheres to the NAPFA Code of Ethics as follows:

Objectivity: NAPFA members strive to be as unbiased as possible in providing advice to clients and NAPFA members practice on a fee-only basis.

Confidentiality: NAPFA members shall keep all client data private unless authorization is received from the client to share it. NAPFA members shall treat all documents with care and take care when disposing of them. Relations with clients shall be kept private.

Competence: NAPFA members shall strive to maintain a high level of knowledge and ability. Members shall attain continuing education at least at the minimum level required by NAPFA. Members shall not provide advice in areas where they are not capable.

Fairness & Suitability: Dealings and recommendation with clients will always be in the client's best interests. NAPFA members put their clients first.

Integrity & Honesty: NAPFA members will endeavor to always take the high road and to be ever mindful of the potential for misunderstanding that can accrue in normal human interactions. NAPFA members will be diligent to keep actions and reactions so far above board that a thinking client, or other professional, would not doubt intentions. In all actions, NAPFA members should be mindful that in addition to serving our clients, we are about the business of building a profession and our actions should reflect this.

Regulatory Compliance: NAPFA members will strive to maintain conformity with legal regulations.

Full Disclosure: NAPFA members shall fully describe method of compensation and potential conflicts of interest to clients and also specify the total cost of investments.

Professionalism: NAPFA members shall conduct themselves in a way that would be a credit to NAPFA at all times. NAPFA membership involves integrity, honest treatment of clients, and treating people with respect.

Participation or Interest in Client Transactions and Personal Trading

TPF does not currently participate in securities in which it has a material financial interest. TPF and its related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which the firm or its related persons has a material financial interest.

TPF or individuals associated with TPF may buy and sell some of the same securities for its own account that TPF buys and sells for its clients. In some cases TPF may buy or sell securities for its own account for reasons not related to the strategies adopted by the TPF's clients. The Code of Ethics is designed to ensure that the personal securities transactions will not interfere with making

decisions in the best interest of advisory clients while at the same time, allowing employees to invest for their own accounts.

In such cases a potential conflict exists between the interests of the TPF and employees of TPF and the interests of the client. In order to eliminate the potential for conflict in these circumstances, it is the policy of TPF that any such trading activity will be limited to widely-held publicly traded stocks, government securities, mutual funds or exchange traded funds. Certain classes of securities, such as open ended mutual funds, are designated as exempt transactions, meaning employees may trade these without prior permission because such trades would not materially interfere with the best interest of TPF's clients.

TPF will disclose to advisory clients any material conflict of interest relating to TPF, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

Item 12 – Brokerage Practices

TPF may use its discretion when recommending a broker-dealer. Clients are not obligated to effect transactions through any broker-dealer recommended by TPF. When recommending a broker-dealer TPF will comply with its fiduciary duty to obtain best execution and with the Securities Exchange Act of 1934, and will take into account such relevant factors as:

- Price;
- The broker-dealers' facilities, reliability and financial responsibility;
- The ability of the broker-dealer to effect transactions, particularly with regard to such aspects as timing, order size and execution of order;
- The research and related brokerage services provided by such broker or dealer to AFP, notwithstanding that the account may not be the direct or exclusive beneficiary of such services; and
- Any other factors the Advisor considers to be relevant.

Item 13 - Review of Accounts

Mary R. Alpers and Steven F. Cruice Jr. are responsible for reviewing and providing recommendations for client accounts. Factors triggering review may include significant changes in your financial condition, changes in the fundamentals of the companies or entities issuing securities, price fluctuations and significant economic or industry developments, and periodic rebalancing of investment assets. Reviews occur on an annual or more frequent basis.

Clients will be provided the Supplemental Brochure (Form ADV Part 2B) for Mary R. Alpers and Steven F. Cruice Jr. Financial planning clients receive financial plan recommendations periodically during the term of their engagement of TPF.

If you maintain any brokerage account(s), your custodian will provide a statement at least quarterly which includes a list of all assets held in the account, asset values, and all transactions affecting the account assets, including any additions or withdrawals.

Item 14 - Client Referrals and Other Compensation

TPF is a fee-only financial planning firm and does not sell insurance or investment products, nor does it accept commissions as a result of any product recommendations. TPF does not pay referral or finder's fees, nor does it accept such fees from other firms.

Item 15 - Custody

TPF does not have custody over client funds and securities. Accordingly, TPF shall have no liability to the client for any loss or other harm to any property in the account.

Clients will receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains the Client's investment assets. TPF urges all clients to carefully review such statements and compare such official custodial records to any statements that we may provide to you. TPF may also provide clients with periodic reports on their accounts. These reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 - Investment Discretion

TPF has investment discretion for certain legacy clients. For new clients, TPF does not have discretionary authority over the Client's accounts. TPF does offer non-discretionary authority which requires TPF to obtain the Client's prior approval of each specific transaction prior to executing investment recommendations, as well as for the selection and retention of sub-advisors to the account. TPF will act in accordance with a Statement of Investment Policy. TPF will only execute transactions for clients when specifically requested and authorized by the Client in writing (and via a fully executed limited power of attorney "LPOA"). In some cases, the Client is in charge of implementing all recommendations.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, TPF does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. At the request of a Client, TPF may provide advice to clients regarding the Clients' voting of proxies.

Item 18 – Financial Information

Registered Investment Advisors are required to provide you with certain financial information or disclosures about their financial condition. TPF has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Mary R. Alpers
Form ADV Part 2B
CRD#4777789
3/2/2023

This Brochure Supplement provides information about Mary R. Alpers that supplements the Three Points Financial, Inc. Brochure. You should have received a copy of that Brochure. Please contact Mary R. Alpers if you did not receive TPF's Brochure or if you have any questions about the contents of this supplement.

Additional information about Mary R. Alpers is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Mary R. Alpers is 85.15% owner of Three Points Financial, Inc. Mary R. Alpers, President of Three Points Financial, Inc., provides investment advice to clients. Ms. Alpers, born in 1955, earned her B.A. in 1977 and an MBA in Corporate Finance in 1987. She earned her Enrolled Agent status with the IRS in 1994, and became a Certified Financial Planner Professional, CFP™ in May of 2006.

Since 1994, Ms. Alpers has owned a tax planning and preparation practice which has included individuals, small businesses, S-Corps, Partnerships, Fiduciaries and Exempt Organizations as clients. Ms. Alpers worked for another comprehensive fee-only planning firm from June 2002-July 2004 as an Associate Advisor.

In August 2004, Ms. Alpers combined her existing tax practice with comprehensive fee-only financial planning. Ms. Alpers passed the Series 65 exam in February 2004 before earning her CFP® designation in May 2006. In May, 2006, she founded Alpers Financial Planning Incorporated, which is now goes by Three Points Financial, Inc.

Mary R. Alpers' Professional Designations and Qualifications:

CERTIFIED FINANCIAL PLANNER™, May 10, 2006

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, over 85,400 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, administered in 10 hours over a two-day period, 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.

IRS Enrolled Agent Certification of Enrollment, May 11, 1994

An Enrolled Agent (EA) is a federally-authorized tax practitioner who has technical expertise in the field of taxation and who is empowered by the U.S. Department of the Treasury to represent taxpayers before all administrative levels of the Internal Revenue Service for audits, collections, and appeals. “Enrolled” means to be licensed to practice by the federal government, and “Agent” means authorized to appear in the place of the taxpayer at the IRS. Only Enrolled Agents, attorneys, and CPAs may represent any taxpayer before the IRS. The Enrolled Agent profession dates back to 1884 when, after questionable claims had been presented for Civil War losses, Congress acted to regulate persons who represented citizens in their dealings with the U.S. Treasury Department. The license is earned in one of two ways: by passing a comprehensive examination which covers all aspects of the tax code, or having worked at the IRS for five years in a position which regularly interpreted and applied the tax code and its regulations. All candidates are subjected to a rigorous background check conducted by the IRS. In addition to the stringent testing and application process, the IRS requires Enrolled Agents to complete 72 hours of continuing professional education,

reported every three years, to maintain their Enrolled Agent status. Because of the knowledge necessary to become an Enrolled Agent and the requirements to maintain the license, there are approximately 53,000 practicing Enrolled Agents. Unlike attorneys and CPAs, who may or may not choose to specialize in taxes, all Enrolled Agents specialize in taxation. Enrolled Agents receive their right to practice from the U.S. government (CPAs and attorneys are licensed by the states).

Enrolled Agents are required to abide by the provisions of the Department of Treasury's Circular 230, which provides the regulations governing the practice of Enrolled Agents before the IRS.

Other requirements within TPF:

All individuals providing investment advice to clients at TPF must hold a Bachelor's Degree from an accredited institution, and an advanced degree is preferred. Also, individuals must either hold or be working towards the CFP® (Certified Financial Planner™) designation. The EA designation (Enrolled Agent) from the IRS or CPA are also preferred in regard to taxation issues. All individuals must be properly registered/licensed (State or SEC) investment advisors.

Item 3- Disciplinary Information

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There is no information to disclose applicable to this Item.

Item 4- Other Business Activities

Mary R. Alpers is not actively engaged in any outside investment related business activities and has no relationships which would create a material conflict of interest with clients.

Mary R. Alpers does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Mary R. Alpers is not actively engaged in any business or occupation which provides a substantial source of income or involves a substantial amount time. At this time, tax return

preparation comprises approximately 10% of her time with fee-only retainer clients. The vast majority of tax preparation is with retainer fee-only financial planning clients and their tax preparation is included in their retainer fees and part of their services.

Item 5- Additional Compensation

Mary R. Alpers does not receive any additional compensation (or other economic benefit) for providing investment advisory services.

Item 6 - Supervision

Mary R. Alpers, President, 719-495-7163, is responsible for the supervision of services and advice provided to clients. She is responsible for the advice provided to clients and ensuring such advice is made in accordance with the Clients' Investment Policy Statement (or similar document which demonstrates suitability.)

Steven F. Cruice Jr.
Form ADV Part 2B
CRD#6761667
3/2/2023

This Brochure Supplement provides information about Steven F. Cruice Jr. that supplements the Three Points Financial, Inc. Brochure. You should have received a copy of that Brochure. Please contact Mary R. Alpers if you did not receive TPF's Brochure or if you have any questions about the contents of this supplement.

Additional information about Steven F. Cruice Jr. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Steven F. Cruice Jr. is 14.85% owner of Three Points Financial, Inc. He provides investment advice to clients. Mr. Cruice, born in 1986, earned his B.S. Accounting in 2008 and completed the Financial Plan Development Capstone Course with the College for Financial Planning in 2013. He became a licensed CPA in 2010 and obtained his CFP® certification in 2017.

He worked as a financial statement auditor in the financial industry for Deloitte & Touche, LLP from 2008 to 2012. He then worked for the life insurance, annuity and investment company, Athene, from 2012 through 2017 in various roles from Senior Accountant to Senior Manager, Strategic Transactions Group (Finance). He founded Simply Steward, LLC, a comprehensive, fiduciary financial planning firm, in 2017 and was the Managing Member and Lead Advisor until October, 2021 when he joined his firm with Three Points Financial, Inc.

Steven F. Cruice Jr.'s Professional Designations and Qualifications:

CERTIFIED FINANCIAL PLANNER™, December 5, 2017

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, over 85,400 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, administered in 10 hours over a two-day period, 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.

Certified Public Accountant

Certified Public Accountant (CPA) is a professional designation or title for those qualified accountants in the United States who have passed the Uniform Certified Accountant Examination and have met additional education and experience requirements for certification as a CPA. Although the CPA exam is "uniform," licensing and certification requirements are determined by respective state law. Eligibility to sit for the CPA exam is determined by individual State Boards of Accountancy and typically requires a bachelor's degree that includes a minimum number of qualifying credit hours in accounting and business administration with an additional one year study (often known as the "150 hours rule" or five years of study).

In addition to work experience as a practicing accountant and the completion of a special examination on ethics, CPAs are generally also required to take continuing education (CPE) courses in order to renew their license. Although requirements may vary by state, many require 120 hours of CPE every three years, with a minimum of 20 hours per calendar year. The requirement may be fulfilled through attending seminars, webcasts, or through self-study that must require a test to receive credit. As part of the CPE requirement, many states require CPAs to take an ethics course during every renewal period, often 2-8 hours per period.

Other requirements within TPF:

All individuals providing investment advice to clients at TPF must hold a Bachelor's Degree from an accredited institution, and an advanced degree is preferred. Also, individuals must either hold or be working towards the CFP® (Certified Financial Planner™) designation. The EA designation (Enrolled Agent) from the IRS or CPA are also preferred in regards to taxation issues. All individuals must be properly registered/licensed (State or SEC) investment advisors.

Item 3- Disciplinary Information

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. There is no information to disclose applicable to this Item.

Item 4- Other Business Activities

Steven F. Cruice Jr. is not actively engaged in any outside investment related business activities and has no relationships which would create a material conflict of interest with clients.

Steven F. Cruice Jr. does not receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Steven F. Cruice Jr. is not actively engaged in any business or occupation which provides a substantial source of income or involves a substantial amount time. At this time, tax return preparation comprises approximately 10% of his time. The majority of tax preparation is for retainer fee-only financial planning clients and their tax preparation is included in their retainer fees and part of their services.

Item 5- Additional Compensation

Steven F. Cruice Jr. does not receive any additional compensation (or other economic benefit) for providing investment advisory services.

Item 6 - Supervision

Mary R. Alpers, President, 719-495-7163, is responsible for the supervision of services and advice provided to clients. She is responsible for the advice provided to clients and ensuring such advice is made in accordance with the Clients' Investment Policy Statement (or similar document which demonstrates suitability.)