Shore Point Advisors LLC
d/b/a: Shore Point Advisors

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FORM ADV PART 2A
BROCHURE

This brochure provides information about the qualifications and business practices of Shore Point Advisors. If you have any questions about the contents of this brochure, contact us at 732-876-3777. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Shore Point Advisors (CRD/IARD # 296848) is available on the SEC's website at www.adviserinfo.sec.gov.

Shore Point Advisors is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

As of our last annual updating amendment, dated February 21, 2023, the following material changes to report:

- TD Ameritrade Inc., previously a recommended broker-dealer and custodial service provider, has merged with Charles Schwab & Co., Inc., ("Schwab") effective September 2023. We revised the disclosures throughout the Brochure to remove references to TD Ameritrade.

- Additionally, we added Altruist Financial LLC ("Altruist") and Interactive Brokers, LLC ("IBKR") as recommended custodians and/or broker dealers. Please review the Altruist and IBKR disclosures related economic benefits, conflicts of interest and other relevant information under the *Brokerage Practices* and *Client Referrals and Other Compensation* sections.

- We added a description of the Five-Factor Model that we utilize to develop portfolios allocations in our investment models. Additionally, we added a disclosure related to interval funds. Please refer to the *Methods of Analysis, Investment Strategies and Risk of Loss* section for additional information.

- Lastly, we added a disclosure to address that representatives of our firm may attend industry conferences and events for the purposes of conducting due diligence and research. This creates a conflict of interest as we have a direct or indirect financial incentive to recommend securities or alternative investments from Companies that pay the event sponsor or partner in the conference. For additional information on how we mitigate this conflict of interest, please refer to the *Client Referral and Other Compensation* section.

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Item 4 Advisory Business

Description of Firm
Shore Point Advisors LLC d/b/a Shore Point Advisors is a registered investment adviser based in Brielle, New Jersey. We are organized as a limited liability company ("LLC") under the laws of the State of New Jersey. We have been providing investment advisory services since July 2018. We are owned by Jason C. Lamb.

Currently, we offer the following investment advisory services, which are personalized to each individual client:

- Financial Planning and Consulting Services;
- Portfolio Management Services; and
- Advisory Services to Retirement Plans and Plan Participants.

The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we," "our," "us," and "Shore Point" refer to Shore Point Advisors and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

Financial Planning and Consulting Services
For clients with assets of less than $125,000, we offer stand-alone financial planning and consulting services which typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their risk tolerance and individual needs. These services can range from broad-based financial planning to consultative or single subject planning. If you retain our firm for financial planning and consulting services, we will meet with you to gather information about your financial and personal circumstances, risk tolerance and objectives. We may also use financial planning software to determine your current financial position and to define and quantify goals and objectives. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Our ongoing financial planning and consulting services include a similar initial data gathering meeting with an introduction to our financial planning and tax planning software. The resulting financial plan will also include a portfolio analysis, if applicable, and additional planning considerations as agreed to in your advisory agreement. Our ongoing services include up to four points of contact throughout the year to review the initial plan and track your progress.

In general, our financial planning and consulting services may address some or all of the following areas where applicable, although, this list is not all inclusive:

Services Offered:

- Prepare and review a full balance sheet;
- Social Security maximization strategy;
- Protection assessment - includes review of current life insurance and property/casualty policies/costs;
- Estate planning evaluation;
- Tax planning;
- Collaboration with CPA's, attorneys, mortgage professionals and property/casualty agents;

- Education funding strategies;
- Beneficiary review on all accounts including life insurance;
- Calculate and establish emergency reserves;
- Annual employer 401k/403b/457b review and client education; and
- Tax loss harvesting review.

Ongoing Services Offered:

- Quarterly review meeting: 10-to-15 minutes on the phone or virtual session;
- Annual financial planning review meeting (approximately 1 hour);
- Investment advice, as appropriate;
- Online client portal and mobile app;
- Client vault for important document storage;
- Quarterly market reports; and
- Monthly email newsletter.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. However, if you elect to enter into a portfolio management agreement, you will be subject to our minimum asset requirements for portfolio implementation. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

Portfolio Management Services

For clients with assets of $125,000 or above, we offer discretionary portfolio management services. Our portfolio management services include the financial planning and consulting services described above at no additional cost. Our investment advice is tailored to meet our clients' needs and investment objectives. We utilize the information gathered through the onboarding or financial planning process to create an Investment Policy Statement ("IPS"). The IPS will outline your personalized investment goals and objectives and describes the strategies that we will employ to meet those objectives.

In order to participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific timing and securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our investment discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

We may invest your assets according to one or more model portfolios developed by our firm. These models are designed for investors with varying degrees of risk tolerance ranging from a more aggressive investment strategy to a more conservative investment approach. We will accept reasonable investment restrictions, but all requested restrictions must be in writing and be accepted by our firm. Approved client restrictions placed on your account may result in both a cash position and investment performance that may differ materially relative to other accounts in the proprietary model without client directed restrictions. The model portfolios are monitored on an ongoing basis and will typically be rebalanced quarterly, except for non-qualified accounts which may not be rebalanced on a quarterly basis in the same manner as qualified accounts.

Advisory Services to Retirement Plans and Plan Participants
We offer various levels of advisory and consulting services to employee benefit plans ("Plan") and to the participants of such plans ("Participants"). The services are designed to assist plan sponsors in meeting their management and fiduciary obligations to Participants under the Employee Retirement Income Securities Act ("ERISA"). Pursuant to adopted regulations of the U.S. Department of Labor, we are required to provide the Plan's responsible plan fiduciary (the person who has the authority to engage us as an investment advisor to the Plan) with a written statement of the services we provide to the Plan, the compensation we receive for providing those services, and our status (which is described below).

<u>Development of an Investment Policy Statement ("IPS")</u>
Shore Point will assist the Plan Sponsor (or an authorized delegate thereof) in developing an IPS, subject to the approval of the Plan Sponsor, that will be based upon the Plan Sponsor's asset class preferences selected by the Plan Sponsor. The number and nature of asset categories and Designated Investment Alternatives ("DIAs") will be based upon the Plan Sponsor's asset class preferences, and each will seek to contain a menu of investments that are sufficient to provide Participants the ability to create well-diversified portfolios through a mix of equity and fixed income exposures.

<u>Initial Selection and On-going Monitoring of the Plan's Designated Investment Alternatives ("DIAs")</u>
Once the IPS is approved by the Plan Sponsor, Shore Point will review the investment options available to the Plan and will utilize qualitative and quantitative analysis to provide the Plan Sponsor with recommendations regarding the Plan's DIAs that meet the criteria set forth in the IPS.

Once our initial recommendations have been implemented, we will monitor the DIAs and will instruct the record-keeper directly to remove and replace investments that no longer meet the IPS criteria. We will communicate any changes to the Plan Sponsor reasonably in advance of the proposed change.

Shore Point will not be responsible for selection or monitoring, and will not make any recommendations to retain or remove, employer stock or investment options beyond the DIAs (i.e., stable value funds, target date portfolios, mutual fund or brokerage windows, guaranteed investment contracts, unallocated accounts, etc.). For Plans that have existing unallocated accounts, those accounts will be mapped to the Plan's money market fund.

<u>Creation and Maintenance of Model Asset Allocation Portfolios ("Model Portfolios")</u>
Shore Point will allocate among the Plan's approved DIAs to create the following five (5) risk-based Model Portfolios to be offered to Plan Participants through the Record-keeper's platform:

(1) Conservative
(2) Moderately Conservative
(3) Moderate
(4) Moderately Aggressive
(5) Aggressive

The Portfolios will be constructed so as to achieve varying degrees of long-term appreciation and capital preservation through a mix of equity and fixed income exposures offered through investment alternatives available through the Plan. We will diversify, reallocate and rebalance the Model Portfolios and associated risk levels over time in accordance with generally accepted investment theories and in compliance with the Plan's IPS. We may make changes to the underlying investments and/or the asset allocation percentages of the Model Portfolios and will communicate such instructions directly to the Plan Sponsor. We will communicate any changes to the Plan Sponsor reasonably in advance of the proposed change.

Qualified Default Investment Alternative ("QDIA") Management
If the Plan has an existing QDIA, we will map those Participant accounts to our Moderate Model Portfolio when available, or alternatively the Moderate Allocation Fund and will serve as the Plan's QDIA Manager with respect to Participant accounts that are automatically defaulted into the Moderate Model Portfolio when available, or alternatively the Moderate Allocation Fund pursuant to ERISA Section 404(c)(5). For new Plans or those that did not previously designate a QDIA, the Plan Sponsor authorizes Shore Point to designate its Moderate Model Portfolio when available, or alternatively the Moderate Allocation Fund as the Plan's QDIA, and any Participant who fails to direct the investment of their accounts will automatically be invested in the Moderate Model Portfolio when available, or alternatively the Moderate Allocation Fund. the Plan Sponsor, however, retains the sole responsibility to provide all notices to Participants as required under ERISA Section 404(c), including 404(c)(5).

ERISA Non-Fiduciary Services
The Plan Sponsor understands that we may provide the following ministerial or administrative services that are not considered to be fiduciary services under ERISA:

Preparation and Delivery of Reports:
- Portfolio holdings
- Quarterly investment summary
- Quarterly investment actions
- Supplementary investment-related educational information

The administrative services we provide to your Plan are described above, and in the Service Agreement and/or advisory contract. Our compensation for these services is described below, in the Item 5 - *Fees and Compensation* section, and also in the Service Agreement. We do not reasonably expect to receive any other compensation, direct or indirect, for the services we provide to the Plan or Participants, unless the plan sponsor directs us to deduct our fee from the plan or directs the plan record-keeper to issue payment for our fee out of the plan. If we receive any other compensation for such services, we will (i) offset the compensation against our stated fees, and (ii) we will promptly disclose the amount of such compensation, the services rendered for such compensation and the payer of such compensation to you. Comparable services for lower fees may be available through other financial professionals. The Fees paid to Shore Point do not cover any execution, custody, clearing or settlement services, or investment management fees charged by mutual funds, third-party managers, or other third parties.

In providing services to the Plan and Participants, our status is that of an investment adviser registered under the Investment Advisers Act of 1940, and we are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting either as a non-discretionary fiduciary of the Plan as defined in Section 3(21) under ERISA, or as a discretionary fiduciary of the plan as defined in Section 3(38) under ERISA.

Wrap Fee Programs
We do not sponsor or act as a portfolio manager in any wrap fee program.

Types of Investments
We primarily offer advice on mutual funds and exchange traded funds. Refer to the *Methods of Analysis, Investment Strategies and Risk of Loss* section below for additional disclosures on this topic. Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship or subsequently delivered into your portfolio.

Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

Rollover Recommendations
Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Assets Under Management
As of December 29, 2023, we provide continuous management services for $212,706,941 in client assets on a discretionary basis and $0 on a non-discretionary basis. Additionally, we advise on approximately $6,685,958 of client assets on a non-continuous basis.

Item 5 Fees and Compensation

Financial Planning and Consulting Services
We charge an hourly or fixed fee for stand-alone and ongoing financial planning and consulting services. For stand-alone financial planning and consulting services we charge a fixed fee that ranges between $150 - $500 and our hourly fee is $250, which is negotiable depending on the scope and complexity of the services rendered. An initial retainer fee will be required at the inception of the advisory services as agreed to in the financial planning and consulting agreement. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the

cost/time could potentially exceed the initial estimate. In such cases, we will notify you and request that you approve the additional fee. The advisory fees for financial planning and consulting services are billed as agreed to in the financial planning and consulting agreement and payable via a check or through various payment options available through AdvicePay, as described below.

For ongoing financial planning and consulting services our fixed fee is $105 per month which is billed in advance through AdvicePay. We require a $250 retainer at the onset of the engagement. The retainer is applied to the first two months of the ongoing fixed fee. Your first fixed monthly fee starts the third month of service. Our fees are negotiable depending on the scope and complexity of the plan, your situation, and your financial objectives.

Payment of financial planning and consulting fees is payable via check or processed through a company named AdvicePay. AdvicePay offers billing services to credit cards, debit cards or checking accounts without our firm accepting custody of client funds. This service will enhance the opportunity for both project based and ongoing financial planning and consulting services with electronic payment processing. Ongoing financial planning and consulting services automatically renew annually based on the execution date of the financial planning and consulting agreement, unless cancelled by written notice prior to that date. You will be required to establish an account directly with AdvicePay.

You may terminate the financial planning and consulting agreement upon written notice to our firm. If you have pre-paid financial planning and consulting fees that we have not yet earned, you will receive a prorated refund of those fees. If financial planning and consulting fees are payable in arrears, you will be responsible for a prorated fee based on services performed prior to termination of the financial planning and consulting agreement.

Portfolio Management Services
Our fee for portfolio management services is based on a percentage of the assets in your account and is set forth in the following annual fee schedule:

Annual Fee Schedule

Certain legacy clients may be billed under a different fee schedule.

Assets Under Management	Annual Fee
$125,000 - $500,000	1.25%
$500,001 - $1,000,000	1.10%
$1,000,001 - $2,000,000	1.00%
$2,000,001 - $5,000,000	0.90%
$5,000,001 - $10,000,000	0.75%
Above $10,000,000	0.65%

Our annual portfolio management fee is billed and payable, quarterly in advance, based on the client account balance at end of billing period. Assets in each of your account(s) are included in the fee assessment unless specifically identified in writing for exclusion and accepted by the firm. Intra-quarter deposits and withdrawals (cash or securities) are pro-rated and adjustments are reflected on the next quarterly billing. If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Please refer to the *Fee Calculation Methodology and Examples* below. Our advisory fee is negotiable, depending on individual client circumstances. Please see Item 7 - *Types of Client* section.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when the following requirements are met:

- You provide our firm with written authorization permitting the fees to be paid directly from your account held by the qualified custodian; and
- The qualified custodian agrees to send you a statement, at least quarterly, indicating all amounts disbursed from your account including the amount of the advisory fee paid directly to our firm.

We will also make available to you invoices reflecting the amount of the advisory fee deducted from your account. Invoices are available through our client portal. We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian call our main office number located on the cover page of this brochure.

You may terminate the portfolio management agreement upon written notice. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Advisory Services to Retirement Plans and Plan Participants
Our advisory fees for these customized services will be negotiated with the Plan Sponsor or named fiduciary on a case-by-case basis as agreed to in the Investment Management Services Agreement. Our annual fee for advisory services to retirement plans and plan participants varies between 0.15% - 0.65%, depending upon the market value of the Plan assets under our management, the type and complexity of the asset management services provided, as well as the level of administration required. Our annual fee for advisory services is billed and payable, quarterly in advance, based on the balance of the Plan assets at end of billing period.

The Plan Sponsor will authorize and direct the record-keeper (or other custodian of the Plan's assets) to remit the Fees on a quarterly basis, directly to Shore Point from Plan assets as outlined in the Investment Management Services Agreement ("Agreement"). Shore Point will rely upon valuation of assets as provided by the Plan Sponsor or the record-keeper of the Plan's assets.

In the event the Agreement commences or terminates on a date other than the first or last business day of a calendar quarter, Shore Point's fees shall be prorated on a daily basis for the portion of the calendar quarter in which we provided services.

The Agreement may be terminated within five business days of the execution of the Agreement without incurring a penalty or charge. Otherwise, the Agreement will remain in effect until terminated by either party upon written notice to the other. If the Plan has any pre-paid advisory fees that Shore Point has not yet earned, the Plan will receive a prorated refund of those fees.

Fee Calculation Methodology and Examples

Quarterly Fee Calculation
We calculate quarterly advisory fees with the following method:
Account Balance at the End of the Previous Quarter x (Number of Days in the Quarter / Number of Days in the Year) x Annual Advisory Fee

Example:
Account Balance on June 30: $45,000
Quarterly Period: July – September (92 days)
Annual Advisory Fee: 1.40%
$45,000 x 92 / 365 x .014 = $158.79 charged in early July

Pro-rata Fee Calculation
For assets transferred into the account during the quarter billed at the start of the next quarter:
Initial Value of Assets upon transfer into account x (Number of Days remaining in the quarter / Number of Days in the Year) x Annual Advisory Fee

Example:
Value of 100 shares of ABC stock received on April 14th: $28,762
Billing Period: April 14 – June 30 (78 days)
Annual Advisory Fee: 1.40%
$28,762 x 78 / 365 x .014 = $86.05 charged in early July

Pro-rata Refund of Fees
For assets transferred out of the account during the quarter refunded at the start of the next quarter:
Value of Assets transferred out of the account on the day transferred x (Number of Days remaining in the quarter / Number of Days in the Year) x Annual Advisory Fee

Example:
Cash disbursed from account on Aug 16: $50,000
Billing Period: August 16 – September 30 (46 days)
Annual Advisory Fee: 1.40%
$50,000 x 46 / 365 x .014 = $88.22 credited towards fees charged in early October

Should an account be transferred and/or terminated, the fee refund will take place as soon as practicable.

Note that during leap years, the annual day count is 366.

Additional Fees and Expenses
As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

Compensation for the Sale of Securities or Other Investment Products
We are affiliated with JCL Financial, LLC ("JCL") through common control and ownership, an insurance company/agency. Persons providing investment advice on behalf of our firm are also licensed as insurance agents of JCL. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are also licensed insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

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

We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, including high net worth individuals, pension and profit sharing plans, charitable organizations, corporations or other businesses entities, state or municipal government entities and other investment advisers.

In general, we require a minimum of $125,000 to participate in our portfolio management services. At our discretion, we may waive this minimum asset level. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

Certain legacy clients may be billed under a different fee schedule than what is published under the *Fees and Compensation* section.

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

Our Methods of Analysis and Investment Strategies
We use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

The Five-Factor Model

1. The Market Factor: Pursue outperformance of stocks vs. fixed income
2. The Size Factor: Pursue ooutperformance of small-cap sotcks over large-cap stocks
3. The Value Factor: Pursue outperformance of high book-to-market (BtM) over low BtM stocks
4. The Profitability Factor: Pursue outperformance of companies with higher future relative earnings
5. The Momentum Factor: Pursue outperformance of sotcks that have risen recently tend to keep rising

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Modern Portfolio Theory - a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets.

Risk: Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Option Writing - a securities transaction that involves selling an option. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell a particular security at a specified price on or before the expiration date of the option. When an investor sells a call option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. When an investor sells a put option, he or she must pay the strike price per share if the buyer exercises the option, and will receive the specified number of shares. The option writer/seller receives a premium (the market price of the option at a particular time) in exchange for writing the option.

Risk: Options are complex investments and can be very risky, especially if the investor does not own the underlying stock. In certain situations, an investor's risk can be unlimited.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Other Risk Considerations

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective client before retaining our services.

<u>Liquidity Risk</u>: The risk of being unable to sell your investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price or it may not be possible to sell the investment at all.

<u>Credit Risk</u>: Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

<u>Inflation and Interest Rate Risk</u>: Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

<u>Horizon and Longevity Risk</u>: The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired, or are nearing retirement.

Recommendation of Particular Types of Securities

We primarily recommend mutual funds and exchange traded funds. However, we may advise on other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its underlying index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its underlying index, or its weighting of investment exposure to such securities may vary from that of the underlying index. Some ETFs may invest in securities or financial instruments that are not included in the underlying index, but which are expected to yield similar performance.

Money Market Funds: A money market fund is technically a security. The fund managers attempt to keep the share price constant at $1/share. However, there is no guarantee that the share price will stay at $1/share. If the share price goes down, you can lose some or all of your principal. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other words, you do not know how much you will earn on your investment next month. The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than you expected to earn, you may end up needing more cash. A final risk you are taking with money market funds has to do with inflation. Because money market funds are considered to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.

Interval Funds: An interval fund is a type of closed-end fund. Unlike other closed end shares they do not trade on the secondary market. Instead, the fund periodically offers to buy back a percentage of outstanding shares at net asset value. The rules for interval funds, along with the types of assets held, make this investment largely illiquid compared with other funds. High yields are the main reason investors are attracted to interval funds. There may not be a guarantee that the fund will offer to buy back the shares.

Certificates of Deposit: Certificates of deposit are generally the safest type of investment since they are insured by the federal government up to a certain amount. However, because the returns are generally very low, it is possible for inflation to outpace the return. Likewise, U.S. government securities are backed by the full faith and credit of the U.S. government but it is also possible for the rate of inflation to exceed the returns.

Municipal Securities: Municipal securities, while generally thought of as safe, can have significant risks associated with them including, but not limited to: the credit worthiness of the governmental entity that issues the bond; the stability of the revenue stream that is used to pay the interest to the bondholders; when the bond is due to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same amount of interest or yield to maturity.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Commercial Paper: Commercial paper ("CP") is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default. There is less risk in asset based commercial paper ("ABCP"). The difference between ABCP and CP is that instead of being an unsecured promissory note representing an obligation of the issuing company, ABCP is backed by securities. Therefore, the perceived quality of the ABCP depends on the underlying securities.

Real Estate Investment Trust: A real estate investment trust ("REIT") is a corporate entity which invests in real estate and/or engages in real estate financing. A REIT reduces or eliminates corporate income taxes. REITs can be publicly or privately held. We recommend traded REITs only. Public REITs may be listed on public stock exchanges. REITs are required to declare 90% of their taxable income as dividends, but they actually pay dividends out of funds from operations, so cash flow has to be strong or the REIT must either dip into reserves, borrow to pay dividends, or distribute them in stock (which causes dilution). After 2012, the IRS stopped permitting stock dividends. Most REITs must refinance or erase large balloon debts periodically. The credit markets are no longer frozen, but banks are demanding, and getting, harsher terms to re-extend REIT debt. Some REITs may be forced to make secondary stock offerings to repay debt, which will lead to additional dilution of the stockholders. Fluctuations in the real estate market can affect the REIT's value and dividends.

Options Contracts: Options are complex securities that involve risks and are not suitable for everyone. We recommend covered call strategies or option collar strategies. Option trading can be speculative in nature and carry substantial risk of loss. It is generally recommended that you only invest in options with risk capital. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an underlying asset at a specific price on or before a certain date (the "expiration date"). The two types of options are calls and puts:

A call gives the holder the right to buy an asset at a certain price within a specific period of time. Calls are similar to having a long position on a stock. Buyers of calls hope that the stock will increase substantially before the option expires.

A put gives the holder the right to sell an asset at a certain price within a specific period of time. Puts are very similar to having a short position on a stock. Buyers of puts hope that the price of the stock will fall before the option expires. Selling options is more complicated and can be even riskier.

The option trading risks pertaining to options buyers are:

- Risk of losing your entire investment in a relatively short period of time.
- The risk of losing your entire investment increases if, as expiration nears, the stock is below the strike price of the call (for a call option) or if the stock is higher than the strike price of the put (for a put option).
- European style options which do not have secondary markets on which to sell the options prior to expiration can only realize its value upon expiration.
- Specific exercise provisions of a specific option contract may create risks.
- Regulatory agencies may impose exercise restrictions, which stops you from realizing value.

The option trading risks pertaining to options sellers are:

- Options sold may be exercised at any time before expiration.
- Covered Call traders forgo the right to profit when the underlying stock rises above the strike price of the call options sold and continues to risk a loss due to a decline in the underlying stock.
- Writers of call options could lose more money than a short seller of that stock could on the same rise on that underlying stock. This is an example of how the leverage in options can work against the option trader.
- Call options can be exercised outside of market hours such that effective remedy actions cannot be performed by the writer of those options.
- Writers of stock options are obligated under the options that they sold even if a trading market is not available or that they are unable to perform a closing transaction.
- The value of the underlying stock may surge or decline unexpectedly, leading to automatic exercises.

Other option trading risks are:

- The complexity of some option strategies is a significant risk on its own.
- Option trading exchanges or markets and option contracts themselves are open to changes at all times.
- Options markets have the right to halt the trading of any options, thus preventing investors from realizing value.
- Risk of erroneous reporting of exercise value.
- If an options brokerage firm goes insolvent, investors trading through that firm may be affected.
- Internationally traded options have special risks due to timing across borders.

Risks that are not specific to options trading include market risk, sector risk and individual stock risk. Option trading risks are closely related to stock risks, as stock options are a derivative of stocks.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

Item 10 Other Financial Industry Activities and Affiliations

Arrangements with Affiliated Entities
We are affiliated with JCL Financial, LLC ("JCL") through common control and ownership. Therefore, persons providing investment advice on behalf of our firm are licensed as insurance agents with JCL. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. See the *Fees and Compensation* section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm. This affiliated firm is otherwise regulated by the professional organizations to which it belongs and must comply with the rules of those organizations. These rules may prohibit paying or receiving referral fees to or from investment advisers that are not members of the same organization.

Referral arrangements with an affiliated entity present a conflict of interest for us because we may have a direct or indirect financial incentive to recommend an affiliated firm's services. While we believe that compensation charged by an affiliated firm is competitive, such compensation may be higher than fees charged by other firms providing the same or similar services. You are under no obligation to use the services of any firm we recommend, whether affiliated or otherwise, and may obtain comparable services and/or lower fees through other firms.

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

Description of Our Code of Ethics
We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions
Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices
Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Aggregated Trading
Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("aggregated trading"). Refer to the *Brokerage Practices* section in this brochure for information on our aggregated trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

We primarily recommend the brokerage and custodial services of Charles Schwab & Co., Inc., Altruist Financial LLC and Interactive Brokers, LLC (whether one or more "Custodian"). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere. Our selection of custodian is based on many factors, including the level of services provided, the custodian's financial stability, and the cost of services provided by the custodian to our clients, which includes the yield on cash sweep choices, commissions, custody fees and other fees or expenses.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.
- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

Please see the *Additional Information* section related to the recommended Custodian's handling of trade errors.

Research and Other Soft Dollar Benefits
We do not have any soft dollar arrangements.

Economic Benefits
As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

Schwab - Your Custody and Brokerage Costs
For our clients' accounts it maintains, Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the un invested cash in your account in Schwab's Cash Features Program. In addition to commission rates and/or asset-based fees Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers.

Schwab Adviser Services

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally are available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that Benefit You
Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You
Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- Provide pricing and other market data;
- Facilitate payment of our fees from our clients' accounts; and
- Assist with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Us
Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events;
- Technology, compliance, legal, and business consulting;
- Publications and conferences on practice management and business succession;
- Access to employee benefits providers, human capital consultants and insurance providers; and
- Discount of up to $4,250 on PortfolioCenter® Reporting Software.

Schwab provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Schwab also provides us with other benefits such as occasional business entertainment of our personnel. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources.

<u>Our Interest in Schwab's Services</u>
The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us. We do not believe that maintaining our client's assets at Schwab for services presents a material conflict of interest.

Altruist Financial LLC and Interactive Brokers, LLC
As disclosed above, we recommend Altruist Financial LLC ("Altruist") and Interactive Brokers, LLC ("IBKR"), members of FINRA/SIPC, for custody and brokerage services. IBKR is a member of the NYSE. Altruist Corp and IBKR provide technology and tools designed to help support investment advisers. Shore Point Advisor is not affiliated with IBKR, IBKR affiliates, Altruist, Altruist Corp, or other affiliates of Altruist. Altruist and IBKR provide Shore Point Advisors with economic benefits to help our firm conduct business and provide services to you (see *Economic Benefits* section above). Such research products and services are provided to all investment advisers that utilize the institutional services platform of Altruist and IBKR. The economic benefits we receive will not directly benefit your account.

These products or services assist us in managing and administering your accounts, including accounts not maintained at Altruist or IBKR. Other services made available by Altruist and IBKR are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in programs offered by Altruist and IBKR, do not depend on the amount of brokerage transactions directed to Altruist or IBKR. As part of our fiduciary duty to you, we endeavor at all times to put your interests first. You should be aware, however, that the receipt of economic benefits by us, or our related persons, in and of itself creates a potential conflict of interest and indirectly influences our choice of Altruist and IBKR for custody and brokerage services.

Brokerage for Client Referrals
We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage
We routinely require that you direct our firm to execute transactions through Schwab, Altruist, or IBKR. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

Aggregated Trades
We generally combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "aggregated trading"). The aggregation or blocking of client transactions potentially allows us to execute transactions in a more timely, equitable, and efficient manner, and seeks to reduce overall transaction costs to clients. We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Generally, participating accounts will pay a fixed transaction cost regardless of the number of shares transacted. In certain cases, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs on any given day. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically in proportion to the size of each client's order. Accounts owned by our firm or persons associated with our firm may participate in aggregated trading with your accounts; however, they will not be given preferential treatment.

Depending on market conditions or for significant model rebalancing, it may not be possible to aggregate orders for all clients within a model. Under such situations the Company may use a different allocation method that the Company believes to be fair. One such method is a rotational process whereby the Company may allocate a trade to one or more clients and then allocate the next trade opportunity to clients that did not participate in the earlier allocation. With this method no account gets preference to any other account as accounts keep rotating with the trade opportunities. For such rotational trades, accounts are grouped based upon the last digit of the account number and are sequenced accordingly. Should there be the need for further grouping, the second to last digit of the account number will be used.

When we do not aggregate client transactions, you may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher or lower commissions, fees, and/or transaction costs than other clients, if applicable.

Mutual Fund Share Classes
Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration the availability of advisory, institutional or retirement plan share classes, initial and ongoing share class costs, transaction costs (if any), tax implications, cost basis and other factors. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent or deferred sales charges.

Item 13 Review of Accounts

Portfolio Management Services
Your investment adviser representative with our firm will monitor your accounts on an ongoing basis and will conduct account reviews at least annually, to ensure the advisory services provided to you are consistent with your investment needs and objectives. Additional reviews may be conducted based on

various circumstances, including, but not limited to: contributions and withdrawals, year-end tax planning, market moving events, security specific events, and/or, changes in your risk/return objectives.

We will not provide you with regular written reports. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s).

Financial Planning and Consulting Services
For stand-alone financial planning and consulting services, our investment adviser representatives will review financial plans as determined as needed. Additional reviews will be conducted upon your request. Updates to the financial plan through our financial planning software, may be provided in conjunction with the review. Extensive updates to your financial plan may be subject to our then current hourly rate, which you must approve in writing and in advance of the update. We recommend that your financial plan is reviewed when there are changes in your circumstances. Changed circumstances may include, but are not limited to marriage, divorce, birth, death, inheritance, lawsuit, retirement, job loss and/or disability, among others. We recommend meeting with you at least annually to review and update your plan if needed.

Forongoing financial planning and consulting services, we will conduct up to four points of contact throughout the year to review the initial plan and track your progress. These reviews are provided as part of the contracted services.

Item 14 Client Referrals and Other Compensation

Charles Schwab & Co., Inc., Altruist and Interactive Brokers Programs
We receive an economic benefits from Schwab, Altruist and IBKR in the form of the support products and services that both entities make available to us and other independent investment advisors whose clients maintain their accounts at Schwab, Altruist or IBKR. You do not pay more for assets maintained at Schwab, Altruist or IBKR as a result of these arrangements. However, we benefit from the referral arrangement because the cost of these services would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, Altruist and IBKR, how they benefit us, and the related conflicts of interest are described above (see Item 12 - *Brokerage Practices*).

As disclosed under the *Fees and Compensation* section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, refer to the *Fees and Compensation* section.

Solicitors/Promoters
We directly compensate non-employee consultants, individuals, and/or entities, also known as solicitors or promoters, for client referrals. We have agreements with solicitors/promoters that are current clients of the firm and non-clients. In order to receive a cash referral fee from us, solicitors/promoters must comply with the requirements of the jurisdictions in which they operate. If you were referred to us by a solicitor/promoters, you should have received a copy of this brochure along with the solicitor's disclosure statement at the time of the referral disclosing whether or not the solicitor/promoter is a client of our firm and the details related to the compensation received for the referral. If you become a client, the solicitor/promoter that referred you to us will receive a percentage of the advisory fee you pay us for as long as you are our client, or until such time as our agreement with the solicitor expires. You will not pay additional fees because of this referral arrangement. Referral fees paid to a solicitor/promoters are contingent upon your entering into an advisory agreement with

us. Therefore, a solicitor/promoters has a financial incentive to recommend us to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain us for advisory services. Comparable services and/or lower fees may be available through other firms.

Solicitors/Promoters that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements. We request that our solicitors/promoters disclose to you whether multiple referral relationships exist and that comparable services may be available from other advisers for lower fees and/or where the solicitor's/promoter's compensation is less favorable.

Research Conferences
Representatives of our firm attend industry conferences and events for the purposes of conducting due diligence and research. Shore Point Advisors recommends that clients purchase interests in certain investments (collectively "Companies") based on the information received at these events. The Companies attending these conferences have, often times, paid the event sponsor to attend, present and/or partner with the event sponsor. The event sponsor will pay for representatives of Shore Point Advisors to attend these conferences which includes airfare, hotel accommodations, meals and transportation. This creates a conflict of interest as Shore Point Advisors has a direct or indirect financial incentive to recommend securities or alternative investments from Companies that pay the event sponsor or partner in the conference. We mitigate this conflict by attending industry conferences where multiple Companies are represented which allows our representative to complete due diligence on multiple Companies at the same conference. As a fiduciary, we have a duty to recommend securities and investments in a client's best interest.

Item 15 Custody

Your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

We will also make available to you invoices reflecting the amount of the advisory fee deducted from your account. Invoices are available through our client portal. You should compare our invoices with the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement, or if you did not receive a statement from your custodian, contact us immediately at the telephone number on the cover page of this brochure.

Trustee Services
Persons associated with our firm may serve as trustees to certain accounts for which we also provide investment advisory services. In all cases, the persons associated with our firm have been appointed trustee as a result of a family or personal relationship with the trust grantor and/or beneficiary and not as a result of employment with our firm. Therefore, we are not deemed to have custody over the advisory accounts for which persons associated with our firm serve as trustee.

Wire Transfer and/or Standing Letter of Authorization
Our firm, or persons associated with our firm, may effect wire transfers from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization. An adviser with authority to conduct such third party wire transfers has access to the client's assets, and therefore has custody of the client's assets in any related accounts.

However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as we meet the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction;
5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria.

Item 16 Investment Discretion

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement and the appropriate trading authorization forms.

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

Item 18 Financial Information

We have not filed a bankruptcy petition at any time in the past ten years.

Item 19 Requirements for State-Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Trade Errors
In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation or the transaction price, and/or reimbursing the account. In certain instances where multiple trades that are related results in gains and losses, those trades will be netted prior to crediting the clients account. This presents a conflict of interest as Shore Point Advisors has an incentive to transact to produce related trade errors that result in a gain to offset the trade errors that result in a loss. Although the Company receive a benefit when netting related trade errors, any residual gain is either credited to the client's account or donated to charity. Unrelated trade errors are not netted.

Trade Errors processed through Schwab
Trade error gains are generally kept in the client's account. However, clients have the opportunity to decline a trade error correction that would result in an unwanted effect, such as a taxable realized gain. When a trade error gain of $100 or more is declined by the client, the gain is donated to charity, the Charles Schwab Foundation, by Schwab and will not be retained by Schwab or Shore Point Advisors. Gains of less than $100 not retained by the client will be kept by Schwab to offset error correction administrative time and expense.

Clients should be aware that there is a difference in the handling of trade errors depending on the custodian you select as disclosed above. Shore Point Advisors does not benefit from trade errors based on the custodian that you select.

Class Action Lawsuits
We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

IRA Rollover Considerations
As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
    a. Employer retirement plans generally have a more limited investment menu than IRAs.
    b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
    a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
    b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 73.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
    a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.