

Four Points Advisors (FPA) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Four Points Advisors is an affiliated SEC RIA to Four Points Capital Partners.

### What investment services and advice can you provide me?

We offer investment advisory services to retail investors, including portfolio management, and financial planning. We offer our services to investors who typically have a minimum of \$50,000 in liquid assets for investment. Four Points Advisors does not require a minimum account size. We accept discretionary authority over client assets. For discretionary investment accounts, the client gives us the authority to make trades when we feel it is appropriate, without consulting the client in advance, which may be subject to certain limitations such as investment mandates, required minimum distributions, and other required events. We customarily provide continuous and regular management services to our separately managed accounts. We maintain legacy non-discretionary investment accounts, where the client must give us specific approval before we make any trades. However, we do not offer these accounts at the present time, non-discretionary accounts limit our ability to proactively manage the account. All investment management activities and recommendations are provided directly by Four Points Advisors. While we do not accept custody of client assets, we work with qualified custodians.

#### Key questions to ask your financial professional:

*Given my financial situation, should I choose an investment advisory service?*

*How will you choose investments to recommend to me?*

*What is your relevant experience, including your licenses, education, and other qualifications?*

*What do these qualifications mean?*

For additional information about the services we provide, please see our Form ADV Part 2A Item 4 and Item 7 of our Firm Brochure, which is available at <https://adviserinfo.sec.gov/firm/summary/171720>.

**What fees will I pay?** Clients can engage the Firm to provide investment advisory services on a fee-only basis. Advisory fees are payable quarterly, in advance, and are based on a percentage of the market value of assets under management for a particular client. Four Points Advisors does not receive performance- or incentive-based compensation from its clients.

The Firm's fee schedule is as follows:

Market Value of Client Assets	Annual Fee (%) of Assets
\$0 - \$2,000,000	1.75% (Negotiable)
\$2,000,001 - \$5,000,000	1.25% (Negotiable)
Over \$5,000,000	Negotiable

Our fees are separate from any fees or expenses assessed by outside parties including fees related to investments such as mutual funds, ETFs, and product level fees. You will incur a transaction fee when we buy and sell an investment for you. You will also pay fees to an unaffiliated custodian that will hold your assets. Four Points Advisors, LLC does not receive or share in any compensation related to these outside charges and fees.

You will pay fees and costs whether you make or lose money on your investments, and fees and costs will reduce any amount of money you make on your investments over time.

**Please make sure you understand what fees and costs you are paying.**

#### Key questions to ask your financial professional:

*Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go fees and costs, and how much will be invested for me?*

For additional information about the fees we charge, see Form ADV, Part 2A Item 5 of our Firm Brochure, and our Investment Advisory Agreement, which is available at <https://adviserinfo.sec.gov/firm/summary/171720>.

### What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act as a fiduciary in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendation(s) we provide you. Here are some examples to help you understand what that means:

The Firm may recommend that clients use the execution services offered by Four Points Capital Partners, LLC (“FPCP”), an affiliated broker/dealer registered with the SEC and the Financial Industry Regulatory Authority (“FINRA”) where the account may be held, or transactions executed. FPCP will usually receive compensation when acting as a broker-dealer executing transactions for Four Points Advisors accounts. Certain employees may be dually licensed with our affiliate broker-dealer and therefore are incentivized to recommend transactions whereby they benefit economically as a result. Four Points is under common control with Prospect Street Holdings LLC, who acts as General Partner to certain private placement and/or pooled investment vehicles that may be offered to you. The directors/ beneficial owners of Prospect Street Holdings, LLC are also directors / beneficial owners of the Adviser and its affiliates. Prospect Street Holdings, its affiliates and their respective members, shareholders, officers and employees and their respective affiliates, may from time to time (1) incur expenses on behalf of the referenced offerings, (2) receive additional compensation for offering such investments, and (3) spend substantial time and attention on other business activities, among others. The Adviser shares supervised persons with Prospect Street Holdings, LLC. For instance, certain shared supervised persons are entitled to and accept compensation for the sale of securities or other investment products, including trailer fees or service fees from the sale of funds, in their individual capacities and affiliation(s) with the referenced affiliates. The Firm permits Employee personal trading, and maintains records as required under the Advisers Act.

#### Key questions to ask your financial professional:

*How might your conflicts of interest affect me, and how will you address them?*

### How do your financial professionals make money?

Investment professionals with a registered investment advisor (RIA) are compensated in the form of a quarterly payment based upon an agreed percentage of the amount of client assets they service, as well as discretionary annual bonuses based on criteria such as merit, employee performance, market performance, etc. Professionals may receive compensation for earning new client business or expanding current relationships in the form of discretionary quarterly bonuses. Four Points Advisors does not compensate Investment professionals employed by the Firm on a transaction basis.

### Does you or your financial professionals have legal or disciplinary history?

Yes. Visit [www.investor.gov/CRS](http://www.investor.gov/CRS) for a free and simple search tool to research us and our professionals

#### Key questions to ask your financial professional:

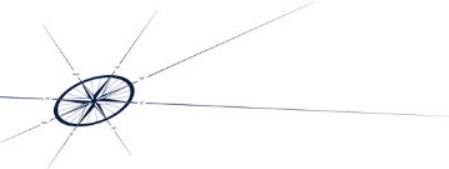
*As a professional, do you have any disciplinary history? For what type of conduct?*

### Information

For additional information about our services please visit our website [www.4pointsadvisors.com](http://www.4pointsadvisors.com). If you would like additional, up-to-date information or a copy of this

#### Key questions to ask your financial professional:

*Who is my primary contact? If he or she a representative of an investment-adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*



Four Points Capital Partners (FPCP) is registered with the Securities and Exchange Commission (SEC) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [www.investor.gov/CRS](http://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Four Points Capital Partners is an affiliated broker dealer to Four Points Advisors, an SEC-registered RIA, and MHA Financial Corp, a state-registered RIA.

## What investment services and advice can you provide me?

We offer brokerage services to retail investors, including buying and selling securities. While we offer research and recommendations with respect to investment products, you make the ultimate decision regarding the purchase or sale of investments. As such, we do not provide account monitoring as a standard service. We offer our services to such retail investors who have a minimum of \$10,000 in liquid assets for investment. FPCP does not require a minimum account size. We do not hold custody of client assets and may accept limited (time/price) discretionary authority. FPCP also offers Private Placements and Reg D offerings to high-net-worth individuals, accredited investors, qualified purchasers, and institutions. In addition, FPCP also offers Investment Banking such, as but not limited to, mergers & acquisitions, equity and debt financing, sports advisory etc.

For additional information, please see Regulation Best Interest Disclosures and other applicable documents under the disclosure section on our website <https://www.4pointscapital.com/>.

### Key questions to ask your financial professional:

*Given my financial situation, should I choose a brokerage service? Why or why not?*

*How will you choose investments to recommend to me?*

*What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

## What fees will I pay?

FPCP charges from 0% to 5% for brokerage services such as the buying and selling of securities. Other products, such as mutual funds, UITs, and variable annuities, may have a different fee schedule and are disclosed in the prospectus. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. There is a fee charged for each transaction. As such the more you make, the more your fees will add up, further a potential conflict exists in that we have incentive for you to engage in transactions. FPCP charges up to 10% for Investment Banking services. or sell, what type of investment you buy or sell, and what kind of account you have with us.

Please make sure you understand what fees and costs you are paying. Our fees vary and are negotiable. The amount you pay will depend, for example, on how much you buy. Other additional fees may be charged to your account, such as custodian fees, account inactivity fees. Please review the Fee Schedule for your custodian for more information to determine if any such fees are applicable to you and your accounts. You should understand that any such fees are not charged by us if your investment is in an account. You may also incur fees charged by the particular investment product in which you are invested. FPCP does not receive a portion of any such fees listed in this section at this time

### Key questions to ask your financial professional:

*Help me understand how these fees and costs might affect my investments.*

*If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

**What are your legal obligations to me when providing recommendations?**

**How else does your firm make money and what conflicts of interest do you have?**

When we provide you with a recommendation, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendation(s) we provide you. Here are some examples to help you understand what that means:

- As we charge a percentage fee for brokerage services, we are incentivized to recommend that you engage in transactions
- Because we do not limit the universe of equity securities that you may invest in, it is possible that our employees may transact in the same securities in their personal accounts.
- Certain representatives are dually licensed with our affiliated SEC-registered investment adviser, Four Points Advisors. This presents a conflict of interest when we recommend their advisory services to you, due to common ownership.

**Key questions to ask your financial professional:**

*How might your conflicts of interest affect me, and how will you address them?*

**For additional information, please see Regulation Best Interest Disclosures and other applicable documents under the disclosure section on our website <https://www.4pointscapital.com/>.**

---

**How do your financial professionals make money?**

Investment professionals with a broker dealer are compensated monthly by receiving an agreed upon percentage of the sales commissions they generate in that particular month. In some less frequent instances, the investment professional may receive non-cash compensation such as warrants etc. FPCP may compensate investment professionals with a discretionary bonus based on certain criteria such as employee performance, merit, customer service, etc. Professionals may receive compensation for earning new client business or expanding current relationships in the form of discretionary bonuses. Investment Banking Professionals are compensated in a similar manner by receiving an agreed upon percentage of the success fees generated from the particular investment Banking transaction. Certain employees may be dually licensed with our affiliate RIAs Four Points Advisors or MHA Financial Corp and may be incentivized to recommend transactions or accounts by which they benefit economically. The directors/beneficial owners of Prospect Street Holdings LLC are also directors/beneficial owners of the broker dealer and its affiliates. Four Points is under common control with Prospect Street Holdings, LLC, who acts as General Partner to certain private placement and/or pooled investment vehicles that may be offered to you.

---

**Does you or your financial professionals have legal or disciplinary history?**

Yes. For information regarding discipline history please visit: [www.investor.gov/CRS](http://www.investor.gov/CRS) and/or [brokercheck.finra.org/](http://brokercheck.finra.org/) for a free and simple search tool to research FPCP and any of our financial professionals.

**Key questions to ask your financial professional:**

*As a professional, do you have any disciplinary history? For what type of conduct?*

---

**Information**

For additional information about our services, visit our website <https://www.4pointscapital.com/>, or contact 212-257-5240. If you would like additional, up-to-date information or a copy of this disclosure, please call 212-257-5240.

**Key questions to ask your financial professional:**

*Who is my primary contact? If he or she a representative of an investment-adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*