

**Two Point Capital Management Inc is an investment adviser registered with the Securities and Exchange Commission.**

**Item 1: Introduction: Is an Investment Advisory Account Right for You?**

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

**We are an investment adviser and we provide advisory accounts and services rather than brokerage accounts and services.** This document gives you a summary of the types of services we provide and how you pay. Please ask us for more information. There are suggestions listed in Item 8 below.

**Item 2: Relationships and Services**

If you open an advisory account with us you will pay an *on-going asset-based fee* at the beginning of each quarter for our services. This fee will be based on the value of the cash and investments in your advisory account on the last day of the previous quarter.

Before we start investing for you we work with you to understand your specific financial situation, your investment goals and your willingness and ability to take financial risk. We use this information to craft an investment portfolio(s) designed to meet your requirements.

We monitor the investments in our accounts daily and are prepared to execute investment decisions on a daily basis. You'll receive a statement that details all of your investments monthly from the custodian institution where your account(s) is held. You'll also be able to monitor your investments on a daily basis through the custodian website.

You can contact us at any time to discuss issues that you think are relevant. We will contact you no less than annually to schedule a formal review of your investments, your short and long-term investment goals and a plan to successfully achieve your goals.

Our advisory service is *discretionary* and is based on our approach to understanding risk using our understanding of value and quality. You give us authority to use our investment discipline to buy and sell investments in your account(s) without asking you in advance.

Our investment approach is used to value individual equity and fixed income securities and our investment selections will be limited to these securities. Other firms could provide advice based on a wider or narrower range of choices and some might have higher or lower costs.

**Item 3: Standard of Conduct**

**Our Obligations to You: We must abide by certain laws and regulations in our interactions with you.**

We are held to a fiduciary standard that covers our entire investment advisory relationship with you. For example, we are required to monitor your portfolio, investment strategy and investments on an on-going basis and to put your investment interests before our own.

Our interests can conflict with your interests. If a conflict of interest arises we must eliminate the conflict or tell you about it in a way that you can understand so that you can decide whether or not to agree to it. It is our goal to ensure that no conflicts of interest exist.

**Item 4: Summary of Fees and Costs**

**Fees and Costs: Fees and costs affect the value of your account over time. Please ask your financial professional to give you personalized information on the fees and costs that you will pay.**

We will provide you with a clear accounting of the fees you pay and the annual and on-going total impact of those fees on the value of your account. Our *asset-based fees* will be deducted from your managed account(s) at the beginning of each quarter and will reduce the value of any account we manage for you.

Our fees depend on the amount of assets that we manage for you and do not vary based on the type of investments we select on your behalf. The more assets we manage for you, including cash, the more you will pay us. We therefore have an incentive to increase the value of the assets in your account because it will also increase our fees. For billing purposes assets in family accounts are combined and fees decline for total assets that exceed \$1 million. Fees on assets over \$10 million are negotiable. You pay our fee quarterly even if we do not make any purchases or sales in your account(s) in the quarter.

You may pay transaction fees to the custodian when we buy or sell investments for you. These fees are determined by the custodian and we do not receive any portion of these fees.

### Item 5: Compare with Typical Brokerage Accounts

You could also open a brokerage account with a **broker-dealer**, where you will pay a **transaction-based fee**, generally referred to as a commission, when the broker-dealer buys or sells an investment for you.

Features of a typical brokerage account include:

- With a broker-dealer, you may select investments or the broker-dealer may recommend investments for your account, but the ultimate decision for your investment strategy and the purchase and sale of investments will be yours.
- A broker-dealer must act in your best interest and not place its interests ahead of yours when the broker-dealer recommends an investment or an investment strategy involving securities. When a broker-dealer provides any service to you, the broker-dealer must treat you fairly and comply with a number of specific obligations. Unless you and the broker-dealer agree otherwise, the broker-dealer is not required to monitor your portfolio or investments on an ongoing basis.”
- If you were to pay a transaction-based fee in a brokerage account, the more trades in your account, the more fees the broker-dealer charges you. So it has an incentive to encourage you to trade often.
- You can receive advice in either type of account, but you may prefer paying:
  - *a transaction-based fee* from a cost perspective, if you do not trade often or if you plan to buy and hold investments for longer periods of time.
  - *an asset-based fee* if you want continuing advice or want someone to make investment decisions for you, even though it may cost more than a transaction-based fee.

**Form ADV, Part 3: Form CRS**  
**June 30, 2020**

**Item 6: Conflicts of Interest: We benefit from the advisory services we provide to you.**

The fees we charge, as discussed in Item 4 above, are revenue to our firm and in that way we benefit from the advisory services we provide you.

**Form ADV, Part 3: Form CRS**  
**June 30, 2020**

**Item 7: Additional Information: We encourage you to seek out additional information.**

Visit [Investor.gov](http://Investor.gov) for a free and simple search tool to research our firm and our financial professionals.

To report a problem to the SEC, visit [Investor.gov](http://Investor.gov) or call the SEC's toll-free investor assistance line at (800) 732-0330.

If you have a problem with your investments, investment account or a financial professional, contact us in writing at:

Two Point Capital Management, Inc.  
4 S. Main Street  
Pittsford, New York 14534

You may also receive additional information from our Form ADV filing on IAPD on [Investor.gov](http://Investor.gov) and on our website at [TwoPointCapital.com](http://TwoPointCapital.com).

**Item 8: Key Questions to Ask**

**Ask our financial professionals these key questions about our investment services and accounts.**

1. Given my financial situation, why should I choose an advisory account? Why should I choose a brokerage account?
2. Do the math for me. How much would I pay per year for an advisory account? How much for a typical brokerage account? What would make those fees more or less? What services will I receive for those fees?
3. What additional costs should I expect in connection with my account?
4. Tell me how you and your firm make money in connection with my account. Do you or your firm receive any payments from anyone besides me in connection with my investments?
5. What are the most common conflicts of interest in your advisory? Explain how you will address those conflicts when providing services to my account.
6. How will you choose investments to recommend for my account?
7. How often will you monitor my account's performance and offer investment advice?
8. Do you or your firm have a disciplinary history? For what type of conduct?
9. What is your relevant experience, including your licenses, education and other qualifications? Please explain what the abbreviations in your licenses are and what they mean.
10. Who is the primary contact person for my account, and is he or she a representative of an investment adviser or a broker-dealer? What can you tell me about his or her legal obligations to me? If I have concerns about how this person is treating me, who can I talk to?