

FORM ADV PART 3 – FORM CRS

Relationship Summary – This document and its content / format is mandated by the SEC and the associated Rule¹. This document is limited to two pages (front and back) and is available upon request for no charge.

Item 1: Date (March 25, 2024); Firm Name: Viewpoint Capital Management, LLC

Viewpoint is Registered with the U.S. Securities and Exchange Commission “SEC” as a Registered Investment Adviser. Free and simple tools are available for you to research firms and Viewpoint’s financial professionals at www.investor.gov/CRS. You can also find educational materials about broker dealers, investment advisers and investing at this same website. You may learn more about Viewpoint by visiting our website at <http://www.viewpointcapitalllc.com>

Item 2: Relationships and Services

A, B: What investment services and advice can you provide me? Viewpoint provides portfolio management services to individual and individual high net worth clients, trusts, estates and other types of clients. We provide ONLY this service to our retail customers. We provide individualized investment advice for each client based on the client’s specific investment facts and circumstances. These include the client’s goals, objectives, and risk tolerance. Please review Viewpoint’s Form ADV Part 2 AB and Privacy disclosure, which is often, but not always provided with this ADV, Part 3.

Monitoring: Viewpoint monitors securities held by clients on an almost continual basis, and we review client accounts at least monthly or when client facts and circumstances change. See also Item 13 of Form ADV, Part 2 AB via IAPD at: <https://adviserinfo.sec.gov/> select “firm” and type in Viewpoint or Viewpoint’s CRD Number 158899.

Investment authority: Retail clients provide us with *investment discretionary authority*, meaning we use your client profile information to purchase, sell or hold securities for your account consistent with your investment profile information, which is distinct from any other client’s information. You may impose investment limitations or restrictions, if provided in writing and if they are acceptable to Viewpoint (meaning, they do not limit our ability to appropriately diversify your account assets). Viewpoint does not have brokerage discretionary authority – we only trade at the broker dealer custodian you instruct us to use. We do not impose minimum account sizes or minimum fees.

We also manage accounts on a *non-discretionary basis*. This means you must be available during market hours to personally authorize any recommended transaction by telephone, email, or voice mail. Note: We may call you to confirm an authorization received via email for your protection.

C. Additional Information: Please see Form ADV Part 2 AB for information on Items 4, Services; Item 5, Fees, and Compensation; Item 7, Types of Clients’ and Item 12, Brokerage Practices. Note: Viewpoint is only paid by the asset-based fee charged on account assets we manage. For personal and friend accounts, we may not charge a fee for similar advisory services.

D. Conversation Starters: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose an investment to recommend to me? What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

Item 3: Fees, Costs, Conflicts and Standards of Conduct

A: What Fees will I pay? Viewpoint charges ONLY an annual, *asset-based fee*, billed quarterly in arrears of the service (see Item 4 of ADV Part 2 AB) that range from 1.0% to 0.70% based on the assets under management and the number of accounts you have with us. Employees and friends of the firm pay no fee, which is not available to general clients. Fee negotiation is limited to the size of assets to manage and the number of accounts you have. The higher your asset values the more you pay in advisory fees. Therefore, we have an incentive to encourage you to increase the asset size in your account(s). As indicated under Item 5 of ADV Part 2 AB, you pay additional fees and expenses to your custodial broker dealer of your account assets. These include

¹ Regulation Best Interest.

certificate fees, postage, among others that are identified in the custodial agreement you have with them. None of these additional fees are paid to Viewpoint or Ryan Sawyer. **Additional Information:** 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. Please make sure you understand what fees and costs you are paying. **Conversation Starter:** 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?

B. Standard of Conduct: What are your legal obligations to me when acting as an investment adviser? How else does your firm make money and what conflicts of interest do you have? *When we act as your investment adviser*, we must act in your best interest and not put our interest ahead of yours. We are a fiduciary to all our clients, a standard of care provided by the Investment Advisers Act of 1940. At the same time, the way we make money creates conflicts of interest between your interests and ours. You should understand as ask us about these conflicts because they can affect the investment advice we provide to you. Here are some examples of to help you understand what this means:

Valuations: Viewpoint does not value securities held in your portfolio. They are all valued by your independent third-party qualified broker / custodian, Schwab.

Trading: We do not place our personal account trades before those of our clients. In some situations, we may (but do not often do so) block client trades with our personal trades. If a block is used, and the full amount of a security is not acquired for a block, we allocate to clients first, personal accounts after. Block trading does not apply to mutual fund trades as they do not generate a benefit (negotiated price). They are completed on the mutual fund's previous days' closing price. We manage accounts on an individual basis, dependent on cash flow needs into and out of client accounts. This is the primary reason we do not often block trade. **Conversation Starter:** How might your conflicts of interest affect me and how will you address them?

C. How do your investment professionals make money? Ryan as the sole owner and investment adviser representative is paid a salary from the gross advisory fee revenue of the business, net of the business expenses. There is no other investment adviser representatives at Viewpoint. There is NO third party, direct or indirect compensation received by Viewpoint or by Ryan. Ryan may pay himself a profit bonus, if applicable. There are no products or securities sold or recommended that provide a commission or payments directly or indirectly to Ryan or Viewpoint.

Item 4: Disciplinary History – Do you or any of your financial professionals have a legal or disciplinary history?

No, None.

Search Tool: Please visit <https://investor.gov/CRS> for a free and simple search tool for Viewpoint and Ryan Sawyer.

Conversation Starter: As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5: Additional Information

You may find additional information on Viewpoint or Ryan Sawyer at www.investor.gov/CRS as previously indicated, or you can request another copy of this ADV Part 3 (Form CRS also known as a Relationship Summary).

To contact Viewpoint, please call Ryan at 206.219.1410 or email him at ryan@viewpointcapitalllc.com or contact Ryan via our website at www.viewpointcapitalllc.com. This form / document and ADV Part 2 AB are posted on Viewpoint's website. Thank you for being a client or prospective client of Viewpoint.

Conversation Starters:

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