

# TruthPoint<sup>TM</sup>

## FINANCIAL

**JANUARY 22, 2025**

**TRUTHPOINT FINANCIAL LLC  
13395 VOYAGER PARKWAY SUITE 130-195  
COLORADO SPRINGS, CO 80921  
719-644-6454**

**[WWW.TRUTHPOINTFINANCIAL.COM](http://WWW.TRUTHPOINTFINANCIAL.COM)**

This brochure provides information about the qualifications and business practices of TruthPoint Financial, LLC (“TPF”). If you have any questions about the contents of this brochure, please contact us at 719-644-6454. 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. TPF is a Registered Investment Adviser. Registration as an Investment Adviser with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Additional information about TruthPoint Financial, LLC is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as an IARD number. The IARD number for TPF is IARD# 312175.

## ITEM 2 – MATERIAL CHANGES

### SUMMARY OF MATERIAL CHANGES

This section of the Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the SEC’s public disclosure website (IAPD) [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Since our last Annual ADV Amendment filing with the State of Colorado made in January 2024, we have the following material updates to report:

- None

Currently, a free copy of our Brochure may be requested by contacting Richard Wilson, Chief Compliance Officer of TPF at 719-644-6454. The Brochure is also available on our web site [www.truthpointfinancial.com](http://www.truthpointfinancial.com).

We encourage you to read this document in its entirety.

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## ITEM 4 – ADVISORY BUSINESS

This Disclosure document is being offered to you by TruthPoint Financial, LLC (“TPF” or “Firm”) about the investment advisory services we provide. It discloses information about our services and the way those services are made available to you, the client.

The firm was formed in December 2020 and became registered as an investment adviser in February 2021. The principal owner, Managing Member and Chief Compliance Officer (“CCO”) is Richard Wilson.

### **RETIREMENT PLAN ADVISORY SERVICES**

Retirement Plan Committees will need to keep a clear view of their fiduciary duties of purpose and duty as it relates to their Investment Policy Statement (“IPS”), desires of their employees and performance. It is vitally important for TruthPoint Financial to keep up-to-date and research, trends and best practices. This means we will need to totally understand the generational changes from the “boomers to millennials” in our investment menu options and focus. As noted in the book “Nudge” the term “choice architecture” where the practice of influencing choice via how options are presented will also be important. Richard Thaler and Cass Sunstein believe that giving participants lots of different choices and trust them to make good decisions is flawed due to “choice overload”. This occurs when too many choices lead to complexity which is then associated with unhappiness, decision fatigue, and choice deferral (meaning I will decide later). Choice overload often leads to worse decisions not better. TruthPoint Financial fully supports this direction. Too many choices are confusing to most people.

Our intent at TruthPoint is to always “tell the truth” and believe fewer choices are better. While providing choice to those plans who want it adding complexity only leads to poor outcomes. And we will be fully transparent on any/all fees inside all funds. Nothing gets hidden. We will build an initial menu for retirement plans that incorporates:

- Target Dated Funds (lowest cost with clean underlying funds). Included should be BRI targeted dated as an option
- A broad inclusion of socially responsible funds.
- Offer “faith-related” funds (or as it’s known BRI – Biblical Responsible Investments)
- Opportunities for some plans/participants to be able to build their own investment selection. We would like to see a creative, well thought out choice (not what everyone else has – hopefully!)
- ETF’s (depending on what is the underlying holding)
- Index, bond and equity funds etc.
- International Funds

Our firm offers Discretionary, Non-Discretionary Investment Advisory Services and/or Retirement Plan Consulting Services to employer-sponsored retirement plans and their participants. Depending on the type of the Plan and the specific arrangement with the Plan Sponsor, we may provide one or more of these services. Prior to being engaged by the Plan Sponsor, we will provide a copy of this Form ADV Part 2A along with a copy of our Privacy Policy and the Investment Fiduciary & Retirement Plan Consulting Agreement (“Agreement”) that contains the information required under Sec. 408(b)(2) of the Employee Retirement Income Security Act (“ERISA”) as applicable.

The Agreement authorizes our Investment Adviser Representatives ("IARs") to deliver one or more of the following services:

### **Discretionary Investment Management Services**

These services are designed to allow the Plan fiduciary to delegate responsibility for managing, acquiring, and disposing of Plan assets that meet the requirements of the Employee Retirement Income Security Act of 1974 ("ERISA"). We will perform these investment management services through our IARs, and charge fees as described in this Form ADV and the Agreement. If the Plan is subject to ERISA, we will perform these services as an "investment manager" as defined under ERISA Section 3(38) and as a "fiduciary" to the Plan as defined under ERISA Section 3(21). Specifically, the Sponsor may determine that we perform the following services:

#### *Selection, Monitoring & Replacement of Designated Investment Alternatives ("DIA")*

Advisor will review with Sponsor the investment objectives, risk tolerance and goals of the Plan and provide to Sponsor an IPS that contains criteria from which Advisor will select, monitor, and replace the Plan's DIAs. Once approved by Sponsor, Advisor will review the investment options available to the Plan and will select the Plan's DIAs in accordance with the criteria set forth in the IPS. On a periodic basis, Advisor will monitor and evaluate the DIAs and replace any DIA(s) that no longer meet the IPS criteria.

#### *Selection, Monitoring & Replacement of Qualified Default Investment Alternatives ("QDIA(s)")*

Based upon the options available to the Plan, Advisor will select, monitor, and replace the Plan's QDIA(s) in accordance with the IPS.

#### *Management Of Trust Fund*

Advisor will review with Sponsor the investment objectives, risk tolerance and goals of the Plan and provide to Sponsor an IPS that contains criteria from which Advisor will select, monitor, and replace the Plan's investments. Once approved by Sponsor, Advisor will review the investment options available to the Plan and will select the Plan's investments in accordance with the criteria set forth in the IPS.

### **Non-Discretionary Investment Services**

These investment services are designed to allow the Plan Sponsor to retain full discretionary authority or control over assets of the Plan. We will solely be making recommendations to the Sponsor. If the Plan is covered by ERISA, we will perform these investment advisory services to the Plan as a "fiduciary" defined under ERISA Section 3(21). The Plan Sponsor may engage us to perform one or more of the following non-Discretionary investment advisory services:

#### *Investment Policy Statement ("IPS")*

Our Firm will review with Plan Sponsor the investment objectives, risk tolerance and goals of the Plan. If the Plan does not have an IPS, our Firm will provide recommendations to Plan Sponsor to assist with establishing an IPS. If the Plan Sponsor has an existing IPS, our Firm will review it for consistency with the Plan's objectives. If the IPS does not represent the objectives of the Plan, our Firm will recommend to the Plan Sponsor revisions to align the IPS with the Plan's objectives.

#### *Advice regarding the Mutual Funds in the Plan Line-up*

Based on the Plan's IPS or other guidelines established by the Plan, our Firm will review the investment options available to the Plan and will make recommendations to assist

Plan Sponsor with selecting mutual funds to be offered to Plan participants. Once the Plan Sponsor selects the mutual funds, our Firm will, on a periodic basis and/or upon reasonable request, provide reports and information to assist Sponsor with monitoring the mutual funds. If a mutual fund is required to be replaced or removed, our Firm will provide recommendations to assist Plan Sponsor with replacing the mutual fund.

*Advice Regarding Qualified Default Investment Alternatives (“QDIA”)*

Based on the Plan's IPS or other guidelines established by the Plan, our Firm will review the investment options available to the Plan and will make recommendations to assist Sponsor with selecting or replacing the Plan's QDIA(s).

*Participant Investment Advice*

Our Firm will meet with Plan participants, upon reasonable request, to collect information necessary to identify the Plan participant's investment objectives, risk tolerance, time horizon, etc. Our Firm will provide written recommendations to assist the Plan participant with creating a portfolio using the Plan's mutual funds or Models, if available. The Plan participant retains sole discretion over the investment of his/her account.

## **Retirement Plan Consulting Services**

Retirement Plan Consulting Services are designed to allow our Firm to assist the Plan Sponsor in meeting his/her fiduciary duties to administer the Plan in the best interests of Plan participants and their beneficiaries. The Plan Sponsor may elect for our Firm to assist with any of the following services:

*Administrative Support*

- Assist Sponsor in reviewing objectives and options available through the Plan
- Review Plan committee structure and administrative policies/procedures
- Recommend Plan participant education and communication policies under ERISA 404(c)
- Assist with development/maintenance of fiduciary audit file and document retention policies
- Deliver fiduciary training and/or education periodically or upon reasonable request
- Recommend procedures for responding to Plan participant requests

*Service Provider Support*

- Assist fiduciaries with a process to select, monitor and replace service providers
- Assist fiduciaries with review of Covered Service Providers ("CSP") and fee benchmarking
- Provide reports and/or information designed to assist fiduciaries with monitoring CSPs
- Assist with use of ERISA Spending Accounts or Plan Expense Recapture Accounts to pay CSPs
- Assist with preparation and review of Requests for Proposals and/or Information
- Coordinate and assist with CSP replacement and conversion

*Investment Monitoring Support*

- Periodic review of investment policy in the context of Plan objectives
- Assist the Plan committee with monitoring investment performance
- Assist with monitoring Designated Investment Managers and/or third-party advice providers

- Educate Plan committee members, as needed, regarding replacement of DIA(s) and/or QDIA(s)

#### *Participant Services*

- Facilitate group enrollment meetings and coordinate investment education
- Assist Plan participants with financial wellness education, retirement planning and/or gap analysis

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### **CONSULTING**

Our consulting recommendations are not limited to any specific product or service offered by a broker dealer or insurance company and will primarily include advice regarding mutual funds and independent third-party managers available through platforms offered by Matrix Trust Company or other platform providers.

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### **ASSETS**

As of December 31, 2024, the Firm manages a total of \$11,332,116 in non-discretionary assets under management. The Firm does not manage any discretionary assets.

### **ITEM 5 – FEES AND COMPENSATION**

Our fees are based upon a percentage of client or plan assets and vary depending on the scope and nature of services provided. The exact percentage will be mutually agreed upon with the client and will depend on such variable as the size of the portfolio, frequency of reviews and preparation of reports, as well as the nature and complexity of the service. Fees may vary for similar clients. Our maximum advisory fee is 1.00% annually. In certain circumstances, a fee annual minimum of \$500 will apply but will not exceed 3% of account value of the Plan. Clients should note that similar advisory services may or may not be available from other registered (or unregistered) investment advisers for similar or lower fees.

Plan advisory services begin with the effective date of the Investment Advisory Agreement, which is the date you sign the Investment Advisory Agreement. For that calendar quarter or month, fees will be adjusted pro rata based upon the number of calendar days in the calendar quarter or month that the Agreement was effective and based on the last business day of the calendar month or quarter. Fees may be billed monthly or quarterly, in advance or in arrears, and be billed directly to the Plan Sponsor or deducted from plan assets, depending on the Agreement. For Plans where our fee is billed to the custodian, the fee is deducted directly from the participant accounts. Written authorization permitting us to be paid directly from the custodial account is outlined in the Investment Advisory Agreement. Our Firm will send invoices to our clients itemizing the advisory fee billed each month or quarter.

We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

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## **CONSULTING**

We provide consulting services for Plan Sponsors who need advice on a limited scope of work. We will negotiate consulting fees with your firm. Our Firm has an hourly rate of \$250. Fees may vary based on the extent and complexity of the consulting project. Fees will be billed as services are rendered. Either party may terminate the agreement.

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## **ADDITIONAL FEES AND EXPENSES**

In addition to the advisory fees paid to our Firm, the Plan Sponsor also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions. These additional charges include custodial fees and commissions. Internal charges may be imposed by a mutual fund or ETF held in a Participant's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses). Other fees include deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, distribution fees and other fees and taxes on brokerage accounts and securities transactions. Our brokerage practices are described at length in Item 12, below.

## **ITEM 6 – PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Our Firm does not charge advisory fees on a share of the capital appreciation of the funds or securities (so-called performance-based fees), nor engage side-by-side management.

## **ITEM 7 – TYPES OF CLIENTS**

Our Firm provides investment advice to employee sponsored retirement Plans. Our Firm does not have a minimum initial account value for engagement in our services.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

Our methods of analysis include fundamental analysis, and the generally accepted theories of asset allocation and modern portfolio theory to assist clients with the construction of retirement plan fund menus and asset allocation models. Most of our services will be oriented around constructing menus of mutual funds and Exchange Traded Funds (“ETF”).

Analysis: We look at the experience and track record of the manager of the mutual fund, or ETF to determine if the manager has demonstrated an ability to invest over a period of time and throughout different economic conditions. We also look at the underlying assets in the funds to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. We monitor the investments to determine if they are continuing to follow their stated investment strategy.

Fundamental analysis concentrates on historical qualitative and quantitative factors that determine the attractiveness of a particular investment. This strategy does not attempt to predict future returns, but rather to identify investment alternatives that have quality track records and



management with the goal of providing retirement plan clients with a high-quality, diversified fund menu for use by plan participants.

Our Firm does engage the services of an independent Registered Investment Adviser to receive buy and sell signals and model portfolios, research, or other information that the Firm uses to manage a particular strategy/portfolio. Such Firms will not act as fiduciaries with respect to any client as they are engaged to provide market-related services to our Firm. All fees incurred by the subscription to various Signal Providers are paid by our Firm. Thus, a portion of the advisory fee paid by a client to our Firm may be used to compensate such third-party providers or consultants.

Developing a portfolio that maintains consistent exposure to multiple asset classes is an important strategy that reduces exposure to risks associated to particular sectors, country or company. Harry Markowitz called diversification “the only free lunch in investing”.

Markets and asset classes perform and behave differently at different times. Certain equities (US and non-US) potentially offer positive returns over long-time periods but can perform very differently in shorter ones. No reliable evidence exists that performance can be predicted ahead of time. As such, a retirement plan investment strategy should have a wide enough menu items to provide diversification while not causing “choice overload”.

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## **RISK OF LOSS**

An investment portfolio is affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic conditions, changes in laws and national and international political circumstances.

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Plan Participants should be prepared to bear the potential risk of loss.

Our methods rely on the assumption that the underlying companies within our security allocations are accurately reviewed by the rating agencies and other publicly available sources of information about these securities. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Risks that apply to both fixed income and equity strategies include, but are not limited to, the following:

- **Active Management Risk:** Due to its active management, a portfolio could underperform other portfolios with similar investment objectives and/or strategies.
- **Allocation Risk:** A portfolio may use an asset allocation strategy in pursuit of its investment objective. There is a risk that a portfolio’s allocation among asset classes or investments will cause a portfolio to lose value or cause it to underperform other portfolios with a similar investment objective and/or strategy, or that the investments themselves will not produce the returns expected.

- **Cybersecurity Risk:** Cybersecurity risks include both intentional and unintentional events at our Firm or one of its third-party counterparties or service providers, that may result in a loss or corruption of data, in the unauthorized release or other misuse of confidential information, and generally compromise our Firm’s ability to conduct its business. A cybersecurity breach may also result in a third-party obtaining unauthorized access to our clients information, including social security numbers, home addresses, account numbers, account balances, and account holdings. Our Firm has established business continuity plans and risk management systems designed to reduce the risks associated with cybersecurity breaches. However, there are inherent limitations in these plans and systems, including that certain risks may not have been identified, in large part because different or unknown threats may emerge in the future. As such, there is no guarantee that such efforts will succeed, especially because our Firm does not directly control the cybersecurity systems of our third-party service providers. There is also a risk that cybersecurity breaches may not be detected.
- **Market and Timing Risk:** Prices of securities may become more volatile due to general market conditions that are not specifically related to a particular company, such as adverse economic conditions or outlooks, adverse investor sentiment, changes in the outlook for corporate earnings, or changes in interest rates.
- **Sector/Region Risk:** The risk that the strategy’s concentration in equities or bonds in a specific sector or industry will cause the strategy to be more exposed to the price movements in and developments affecting that sector.
- **Event Risk:** The possibility that an unforeseen event will negatively affect a company or industry, and thus, increase the volatility of the security.
- **Capitalization Risk:** Small-cap and mid-cap companies may be hindered as a result of limited resources or less diverse products or services. Their stocks have historically been more volatile than the stocks of larger, more established companies.
- **Exchange-Traded Fund (“ETF”) and Mutual Fund Risk:** Investments in ETFs and mutual funds have unique characteristics, including, but not limited to, the ETF or mutual fund’s expense structure. Investors of ETFs and mutual funds held within TPF accounts bear both their TPF Portfolio’s advisory expenses and, indirectly, the ETF’s or mutual fund’s expenses. Because the expenses and costs of an underlying ETF or mutual fund are shared by its investors, redemptions by other investors in the ETF or mutual fund could result in decreased economies of scale and increased operating expenses for such ETF or mutual fund. Additionally, the ETF or mutual fund may not achieve its investment objective. Actively managed ETFs or mutual funds may experience significant drift from their stated benchmark. . Any of these factors may lead to the fund’s shares trading at either a premium or a discount to its “net asset value.
- **Market Risk:** When the stock market strongly favors a particular style of equity investing, some or all of TPF’s equity strategies could underperform. The performance of participant accounts could suffer when TPF’s particular investment style(s) are out of favor. For example, TPF’s large-cap equity strategies could underperform when the market favors

smaller capitalization stocks. TPF's strategies with exposure to small/mid-cap stocks could underperform when the market favors larger capitalization stocks. Additionally, growth securities could underperform when the market favors value securities.

- **Sector Risk:** At times, a portfolio may have a significant portion of its assets invested in securities of companies conducting business in a related group of industries within an economic sector. Companies in the same economic sector may be similarly affected by economic, regulatory, political or market events or conditions, which make a portfolio more vulnerable to unfavorable developments in that economic sector than portfolios that invest more broadly. Generally, the more a portfolio diversifies its investments, the more it spreads risk and potentially reduces the risks of loss and volatility.

## ITEM 9 – DISCIPLINARY INFORMATION

Our Firm does not have any legal, financial or other “disciplinary” item to report.

## ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

### OTHER FINANCIAL AFFILIATIONS

Our Firm does engage the services of an independent Registered Investment Adviser to receive buy and sell signals and model portfolios, research, or other information that the Firm uses to manage a particular strategy/portfolio. Such Firms will not act as fiduciaries with respect to any client as they are engaged to provide market-related services to our Firm. All fees incurred by the subscription to various Signal Providers are paid by our Firm. Thus, a portion of the advisory fee paid by a client to our Firm may be used to compensate such third-party providers or consultants.

## ITEM 11 – CODE OF ETHICS

Our Firm and persons associated with us are allowed to invest for their own accounts, or to have a financial investment in the same securities or other investments that we recommend and may engage in transactions that are the same as or different than transactions recommended to or made for our clients. This creates a conflict of interest. We recognize the fiduciary responsibility to act in the best interest of our Clients and have established policies to mitigate conflicts of interest.

We have developed and implemented a Code of Ethics that sets forth standards of conduct expected of our advisory personnel to mitigate this conflict of interest. The Code of Ethics addresses, among other things, personal trading, gifts, and the prohibition against the use of inside information.

The Code of Ethics is designed to protect, detect and deter misconduct, educate personnel regarding the Firm's expectations and laws governing their conduct, remind personnel that they are in a position of trust and must act with complete propriety at all times, protect the reputation of TPF, safeguard against the violation of the securities laws, and establish procedures for

personnel to follow so that we may determine whether their personnel are complying with the Firm's ethical principles.

We have established the following restrictions to ensure our Firm's fiduciary responsibilities:

- No supervised employee of TPF shall prefer his or her own interest to that of the advisory client.
- We maintain a list of all securities holdings of anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer/individual of TPF.
- We require that all supervised employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- Any supervised employee not in observance of the above may be subject to termination.

None of our associated persons may affect for himself/herself or for accounts in which he/she holds a beneficial interest, any transactions in a security which is being actively recommended to any of our clients, unless in accordance with the Firm's procedures. Our Firm's procedures prohibit employee trading from frontrunning or disadvantaging trading for any client accounts.

You may request a complete copy of our Code of Ethics by contacting us at the address, telephone, or email on the cover page of this Part 2; ATTN: Richard Wilson, Chief Compliance Officer.

## ITEM 12 – BROKERAGE PRACTICES

Clients must maintain assets in an account at a "qualified custodian" ("Custodian"), generally a broker-dealer, trust company or bank. The Custodian will hold client assets in a brokerage account and buy and sell mutual funds when we instruct them to after our prior consultation with the Plan Sponsor. Our Firm generally recommends that investment management accounts be maintained at Matrix Trust.

Prior to engaging our Firm to provide our advisory services, clients will be required to enter into a formal Investment Agreement with our Firm setting forth the terms and conditions under which TruthPoint shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. Each Plan Sponsor must decide which Custodian to utilize and open accounts with the Custodian by entering account agreements directly with them. The accounts will always be held in the name of the client and never in TPF's name.

In addition to working with the parties described above, our Firm will help select a third-party administrator to assist the Plan with recordkeeping requirements. Our firm generally recommends Penserv Plan Services, Inc., a full-service, third-party administrator (TPA) offering retirement plan recordkeeping and administrative services, compliance testing, auditing, and document services to large and small for-profit and nonprofit employers, as well as tax-exempt governmental, educational, and religious institutions.

## ITEM 13 – REVIEW OF ACCOUNTS

### ACCOUNT REVIEWS AND REVIEWERS – INVESTMENT SUPERVISORY SERVICES

Our Firm will monitor the investment line-ups on a quarterly basis and provide quarterly reviews to each Plan Sponsor or as frequently as indicated and defined in the Agreement with the Plan. All accounts are reviewed for consistency with the Plan's investment strategy, asset allocation, risk tolerance and performance relative to the appropriate benchmark. More frequent reviews may be triggered by changes in geopolitical and macroeconomic specific events.

### STATEMENTS AND REPORTS

Our Firm will prepare regular quarterly reports for the Plan Sponsor. The nature and frequency of the reports varies, depending on the service agreement with the Plan Sponsor.

The Custodian for the Plan will also provide an account statement at least quarterly. The Plan Sponsor is urged to compare the reports and invoices provided by our Firm against the account statements you receive directly from the Plan's Custodian and promptly notify the Firm of any discrepancies.

## ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

We do not pay referral fees or receive compensation for client referrals.

## ITEM 15 – CUSTODY

We do not have physical custody, as it applies to Investment Advisers. Custody has been defined by regulators as having access or control over client funds and/or securities.

### DEDUCTION OF ADVISORY FEES

Through our written Agreement with the Plan Sponsor, our Firm may be given the authority to have its management fees deducted directly from the Plan assets held at the Qualified Custodian. Our Firm has established procedures to ensure all Plans are held at a qualified custodian in a separate account for each Plan under that Plan Sponsor's name. The Plan Sponsor will direct, in writing, the establishment of Plan Account and therefore be aware of the qualified custodian's name, address, and the way the funds or securities are maintained. Finally, invoices are generated by our Firm itemizing the advisory fees and mailed to the address of the Plan Sponsor. Account statements are delivered directly from the qualified custodian to each Plan Sponsor at least quarterly. You should carefully review those statements and are urged to compare the statements against reports and invoices received from our Firm. You should promptly notify our Firm of any discrepancies. When you have questions about your account statements, you should contact TPF or the qualified custodian preparing the statement.

Please refer to Item 5 for more information about the deduction of adviser fees.

## **ITEM 16 – INVESTMENT DISCRETION**

In some cases, with our employee sponsor retirement plan clients, our Firm exercises a limited amount of discretion in client accounts, if allowed for in the Plan Sponsor Agreement with that client. Our discretion would come in the form of replacing an investment option in a company retirement plan and initiating the transfer of client assets from the old to the new fund. With some service arrangements, we may also manage model portfolios on a discretionary basis, including allocating assets, rebalancing, and replacing funds as needed. For these limited discretionary accounts, prior to engaging our firm to provide investment advisory services, you will enter a written Agreement with us granting the firm the authority to supervise and direct, on an on-going basis, investments in accordance with Investment Policy Statement.

For our non-discretionary engagements, our Firm will discuss our recommendations and receive prior authorization for all transactions with the Plan Sponsors prior to facilitating any mutual fund changes to the Plan.

## **ITEM 17 – VOTING CLIENT SECURITIES**

We will not vote proxies on your behalf. The Plan Sponsor can contact our office with questions about a particular solicitation by phone at 719-644-6454.

## **ITEM 18 – FINANCIAL INFORMATION**

We do not require or solicit prepayment of more than \$500 in fees, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We are not subject to a financial condition that is likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition at any time.

## **ITEM 19 – REQUIREMENT FOR STATE REGISTERED ADVISORS**

Please refer to Form ADV Part 2B, Item 2 regarding the formal education and business background of our IARs. No employees of the Firm have outside business activities to report.

No employees have been involved in or found liable in an arbitration claim or civil, self-regulatory organization or administrative proceeding alleging damages in excess of \$2,500, involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. Our Firm maintains a written Business Continuity Plan (BCP). The BCP outlines procedures relating to an emergency or significant business disruption. Our procedures are designed to enable our Firm or any of its investment advisor representatives to meet their existing fiduciary obligations.

If you have any questions, concerns or require additional information before retaining the services of TPF, you may contact the CCO Richard Wilson at 719-644-6454.

# TruthPoint<sup>TM</sup>

## FINANCIAL

**13395 VOYAGER PARKWAY SUITE 130-195  
COLORADO SPRINGS, CO 80921  
719-644-6454**

### **Richard Wilson**

2B Supplemental Brochure  
January 2025

The Brochure Supplement provides information about Richard Wilson (CRD#7322999) that supplements the TruthPoint Financial, LLC's Brochure. You should have received a copy of the Brochure. Please contact the Chief Compliance Officer at 719-644-6454 if you did not receive our Firm's Brochure or if you have any questions about the contents of this supplement.

Additional information about Richard Wilson is available on the SEC's website at <https://adviserinfo.sec.gov/>. You can search this site by a unique identifying number, known as the CRD number listed above.

## ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

### Richard Wilson

Born: 1956

Post-Secondary Education:

- Attended Tyndale College 1976-1979: No Formal Degree

Recent Business Experience:

- *TruthPoint Financial*, Managing Member/CCO/Investment Adviser Representative, 2021 – Present
- *Gardiner Kidd Capital*, Consultant, 2019 – 2020
- *Envoy Financial*, COO, 2017-2019
- *Gardiner Kidd*, Consultant, 2016 – 2017
- *TenFold BPO*, President/CEO, 2013-2016
- *SVP Group*, Co-owner, 2010-2012
- *Iron Mountain Corp.*, Vice President, 2002 - 2009

## ITEM 3 - DISCIPLINARY INFORMATION

Richard Wilson has no history of any legal or disciplinary events deemed material to a client's consideration of Richard Wilson to act as their investment adviser representative. FINRA's BrokerCheck® may have additional information regarding the disciplinary history of Richard Wilson that is not included in this brochure supplement. <https://adviserinfo.sec.gov/>.

## ITEM 4 - OTHER BUSINESS ACTIVITIES

Richard Wilson is a Managing Member of Gardiner Kidd Capital, LLC. This entity is only used for his ownership interest in TruthPoint Financial, LLC.

## ITEM 5 - ADDITIONAL COMPENSATION

Richard Wilson does not receive any economic benefit for providing advisory services beyond the scope of TruthPoint Financial, LLC and business activities listed in Item 4.

## ITEM 6 - SUPERVISION

Richard Wilson is the Chief Compliance Officer of TruthPoint Financial, LLC and is self-supervised.

Richard Wilson adheres to the Firm's Compliance policies and procedures. Specific areas of review include transactions, account suitability and written correspondence including email, among other activities. Richard Wilson may be reached at 719-644-6454.

## ITEM 7 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Richard Wilson has not been involved in or found liable in an arbitration claim or civil, self-regulatory organization or administrative proceeding alleging damages in excess of \$2,500, involving an investment or an investment-related business or activity; fraud, false statement(s),



or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices.

Richard Wilson has not been the subject of a bankruptcy petition. To the best of our ability all material conflicts of interest are disclosed regarding the Firm, its representatives or any of its employees, which could be expected to impair the rendering of unbiased and objective advice.