

ACTION POINT RETIREMENT GROUP, LLC

FIRM BROCHURE (ADV PART 2A)

MARCH 30, 2025



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This brochure provides information about the qualifications and business practices of Action Point Retirement Group, LLC. If you have any questions about the contents of this brochure, please contact Aaron Wassenaar at (616) 622-3074. 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.

Action Point Retirement Group, LLC is a registered investment adviser. Registration of an Investment Advisor does not imply any level of skill or training. The written communications of an Advisor provide you with information about which you determine to hire or retain an Advisor.

Additional information about Action Point Retirement Group, LLC is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The Advisor's CRD number is 282058

2. MATERIAL CHANGES

Form ADV Part 2 requires registered investment advisers to amend their brochures 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.

Since our last annual updating amendment date 3/24/2024, we have amended this brochure to disclose the following material changes:

1. There are no material changes to our disclosure at this time.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Action Point Retirement Group.

If you have any questions about this disclosure, please contact Aaron Wassenaar, at the phone number on the cover page of this brochure.

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4. ADVISORY BUSINESS

A. OWNERSHIP/ADVISORY HISTORY

Action Point Retirement Group, LLC (“the Advisor”) was established as a Michigan Limited Liability Company in October 2015. It was subsequently registered as a Michigan investment adviser. The Advisor’s owner and investment adviser representative is Aaron Wassenaar (“Mr. Wassenaar”). Additional information about Mr. Wassenaar can be found under Item 19 – Requirements for State-Registered Advisers.

B. DESCRIPTION OF ADVISORY SERVICES OFFERED

Action Point Retirement Group provides portfolio management services and institutional retirement advisory services. Action Point will meet with a client to evaluate the individual client’s investment needs, goals and objectives. After the evaluation, Action Point may recommend one of the services described below.

i. PORTFOLIO MANAGEMENT

Action Point Retirement Group’s portfolio management engagement with a client will include, as appropriate, the following:

- Providing assistance in reviewing the client’s current investment portfolio against the client’s personal and financial circumstances as disclosed to Action Point in response to discussions with the client and reviewed in meetings.
- Analyzing the client’s financial circumstances, investment holdings and strategy, and goals.
- Providing assistance in identifying a targeted asset allocation and portfolio design.
- Implementing and/or recommending an appropriate investment portfolio.
- Implementing changes in the client’s investment portfolio in consideration of changes in the client’s personal circumstances, investment objectives, and tolerance for risk, the performance record of any of the client’s investments, and/or the performance of any fund retained by the client, as well as based on changing economic and market outlooks.

With non-discretionary portfolio management services, prior to the execution of any trades, Action Point will telephone the client to receive his/her authorization. Upon receiving the client’s authorization Action Point will execute the trade per his/her instructions.

ii. INSTITUTIONAL RETIREMENT INVESTMENT ADVISORY SERVICES

Action Point Retirement Group provides investment consulting and investment advisory services to institutional ERISA and non-ERISA retirement plans. Institutional investment management services typically include portfolio design, preparation of investment policy statements, screening of investment selections, and performance monitoring. Employees in qualified retirement plans are protected by the Employee Retirement Income Security Act of 1974 (ERISA), which requires employers, investment advisors, and plan administrators to put employees’ interests first when managing retirement savings plans. Public retirement systems are governed by similar state laws and often incorporate the protections of ERISA.

In order to demonstrate that a plan fiduciary has operated in a prudent manner, there are certain steps that the fiduciary must take. Action Point Retirement Group is committed to helping fiduciaries understand their roles and to assist them in implementing a process that allows them to fulfill their duties and responsibilities.

Action Point will assist plan fiduciaries in the following:

Investment Selection and Monitoring

- Creating an investment policy statement
- Screening investment selections
- Monitoring the investment options against well-defined risk and return criteria

Plan Evaluation/Benchmarking

Action Point Retirement Group also “benchmarks” retirement plans against those of organizations in the same industry and against national “industry” data. Factors that are used to evaluate retirement plans include the following:

- Participation, deferral percentage, and asset allocation
- Investment performance
- Plan design
- Total plan costs
- Recordkeeping and administration
- Participant education and communication
- Technology
- Service provider capabilities and profiles

Vendor Search and Plan Implementation

Action Point Retirement Group will also assist its retirement plan clients in selecting trustees, custodians, actuaries, and other service providers. This process involves:

- Generating criteria to identify appropriate service providers
- Developing requests for proposals
- Objectively rating service providers
- Evaluating highly rated service provider candidates

Once a service provider is selected, Action Point will assist a client in implementing the client’s retirement plan program. In implementing the program, Action Point Retirement Group will, among other things, review the plan design, develop performance standards, and review the service provider’s contract.

iii. CORPORATE EMPLOYEE EDUCATION SERVICES

Action Point Retirement Group works with businesses to provide financial educational services to the company’s employees. Action Point will provide onsite, virtual, & phone meetings to help their employees with their individual financial situations. Action Point Retirement Group will also provide group seminars & webinars. The topics covered include but are not limited to risk tolerance, asset allocation, retirement planning and retirement income.

C. TAILORED SERVICES

As described above, the Advisor's services are individualized to each client. Portfolio management clients may impose restrictions on investment in certain securities or types of securities. All restrictions must be presented to the Advisor in writing.

D. WRAP PROGRAM

Action Point Retirement Group does not sponsor a wrap program.

E. CLIENT ASSETS MANAGED

As of December 31, 2024, Action Point Retirement manages \$72,000,000 in client assets of which \$1,000,000 is discretionary and \$71,000,000 is non-discretionary.

5. FEES AND COMPENSATION

PORTFOLIO MANAGEMENT SERVICES

Fees for portfolio management services will be a percentage of the assets under management. The fee will be calculated, accrued and due quarterly in arrears based upon the annualized rate of 1%. The fee is negotiable based upon the size of the account and/or if the client has multiple accounts within the household with Action Point Retirement. The fee will be based upon the quarter end value of the account and may not be paid in advance. The client will be asked to authorize Action Point Retirement Group with the ability to withdraw the fee directly from the client's account.

Action Point Retirement Group's fees are separate and distinct from other fees or expenses that may include brokerage charges, transaction fees, and other related costs and expenses. Additionally, clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by mutual fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, as disclosed in a fund's prospectus, which are separate and distinct from the firm's fee.

A client may terminate the Investment Management Agreement for any reason at any time and, within the first five (5) business days after signing the contract and receive a 100% refund of any fees paid without any cost or penalty. Thereafter, the Agreement may be terminated at any time by giving seven (7) days written notice. The written notice of termination must be sent to Action Point Retirement Group, LLC, 8177 W. Irving Rd., Middleville, MI 49333.

INSTITUTIONAL RETIREMENT ADVISORY SERVICES

Action Point Retirement Group's fees for its institutional retirement advisory services to retirement plan sponsors may be paid by the plan or trust or by the plan sponsor and may be a flat fee or a fee that is a percentage of the assets in the plan. Typical services include:

- Creating an investment policy statement
- Monitoring the investment options against well-defined risk and return criteria
- Selecting investment managers
- Reviewing target date funds (TDFs & Managed Accounts)

Non-Discretionary Asset-Based Fee Alternative

Fees for institutional retirement plan advisory services are generally calculated based on a percentage of client assets under advisement and are calculated quarterly in arrears. The asset-based fee ranges from 0.05% to 0.75% of assets under advisement.

<u>Assets Under Advisement</u>	<u>Annual Fee Rate*</u>
Under \$1,000,000	Up to 0.75%
\$1,000,000 to \$5,000,000	Up to 0.50%
\$5,000,000 to \$10,000,000	Up to 0.35%
\$10,000,000 to \$50,000,000	Up to 0.25%
\$50,000,000 to \$150,000,000	Up to 0.15%
\$150,000,000 to \$500,000,000	Up to 0.10%
Over \$500,000,000	Up to 0.05%

* Fees are negotiable.

Action Point Retirement Group generally requires a minimum annual fee of \$7,500. This equates to a minimum account size of \$1,000,000. Action Point Retirement Group may waive the required minimum account values in special circumstances and reserves the right to make exceptions to such minimum account values at its sole discretion. Fees are negotiable.

Fees may be paid monthly or quarterly and are calculated in arrears, as negotiated by Action Point Retirement Group and the client. Fees that are a percentage of the plan's assets are based on the value of the aggregate assets as of the end of the preceding period for which the fee is being calculated. The plan will select either direct fee withdrawal from the plan assets or to have the fee invoiced.

Fixed-Fee Alternative

The amount of the fee is negotiable and is generally determined by the size of the plan, the diversification desired in the portfolio, the scope of services agreed to by the client, and the number of meetings and consultations Action Point Retirement Group expects with the client. A flat fee is generally between \$10,000 - \$25,000, with a minimum fee of \$7,500. The fee is billed quarterly in arrears. An invoice will be sent to the company that is due within 15 days of receipt

An agreement for institutional retirement advisory services may be terminated upon seven (7) days notice to Action Point Retirement Group. If the client has not received the firm's disclosure documents (Brochure and Brochure Supplements) at least 48 hours prior to signing the investment advisory agreement, the client has the right to terminate an agreement without penalty within five business days after entering into the agreement. Any earned, unpaid fees will be immediately due and payable.

6. PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

Action Point Retirement Group does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

7. TYPES OF CLIENTS

Action Point Retirement Group's services are offered to individuals, high net worth individuals, and corporations or other business entities. We do not have a stated minimum size.

8. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

With respect to Action Point Retirement Group's portfolio management services, it uses an individualized asset allocation method for each client. When deciding on the asset allocation for a client, the Advisor takes into account the client's risk tolerance, goals, investment objectives and other data gathered during the client meetings. Asset Allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance and investment horizon among various asset classes. The risk associated with asset allocation is that each class has different levels of risk and return, so each will behave differently over time. Also, despite being diversified there is no guarantee that an account will grow.

When Action Point manages client accounts it uses a combination of the following types of analysis:

- *Fundamental analysis* is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's *actual* business and its future prospects. The analysis is performed on historical and present data. On a broader scope, one can perform fundamental analysis on industries or the economy as a whole. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements. The risk associated with fundamental analysis is that despite that appearance that a security is undervalued, it may not rise in value as predicted.
- *Technical Analysis* is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. The risk associated with technical analysis is that there is no broad consensus among technical traders on the best method of identifying future price movements.
- *Tactical Asset Allocation* is an active management portfolio strategy that rebalances the percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors. This strategy is designed to allow portfolio managers to create extra value by taking advantage of certain situations in the marketplace. It is a moderately active strategy because portfolio managers return to the portfolio's original strategic asset mix when desired short-term profits are achieved.

Action Point Retirement Group's analysis of securities and advice relating thereto may be based upon information obtained from financial newspapers and magazines, research materials prepared by others, corporate ratings services, and annual reports, prospectuses and filings made with the Securities and Exchange Commission. Action Point may also utilize computer models for performance analysis, asset allocation and risk management.

B. RECOMMENDED SECURITIES AND INVESTMENT RISKS

Action Point Retirement Group primarily uses individual stocks and exchange traded funds. It may also use other securities such as, but not limited to: Equity Securities; Bonds and other corporate debt instruments; Mutual Fund Securities; Government Debt instruments including Treasury Bills and Municipal securities; Certificates of Deposit; Money Market Funds and Cash.

All investments bear different types and degrees of risk and **investing in securities involves risk of loss that clients should be prepared to bear**. While Action Point uses investment strategies that are designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. A client needs to ask questions about risks he/ she does not understand. The Advisor would be pleased to discuss them.

An investment could lose money over short or even long periods. A client should expect his/her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. The client's account performance could be hurt by:

- **Stock market risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- **Interest rate risk:** The chance that bond prices overall will decline because of rising interest rates. Interest rate risk will vary for the Firm, depending on the amount of Client assets invested in bonds.
- **Manager risk:** The chance that the proportions allocated to the various securities will cause the Client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **International Investing Risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, that differ from those of the U.S.
- **Credit risk:** This is the risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.
- **Inflation Risk:** This is the risk that inflation will undermine the performance of your investment and/or the future purchasing power of your assets.
- **Liquidity Risk:** Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing the ability to sell such illiquid securities at an advantageous time or price, or possibly requiring the client to dispose of other investments at unfavorable times or prices in order to satisfy its obligations.

9. DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events within the past 10-years that would be material to your evaluation of the Advisor or the integrity of its management.

Action Point Retirement Group, LLC and its owners have no information applicable to this Item because they have never been the subject of any administrative, civil, criminal, regulatory (SEC or State) or self-regulatory proceedings.

10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. BROKER-DEALER AFFILIATIONS

Action Point Retirement Group and its owners are not affiliated with a broker-dealer.

B. FUTURES/COMMODITIES AFFILIATIONS

Action Point Retirement Group and its owners are not affiliated with a futures or commodities broker.

C. SELECTION OF THIRD-PARTY INVESTMENT ADVISORS

Action Point Retirement Group does not select and monitor Third Party Investment Advisers.

D. INSURANCE AFFILIATIONS

Action Point Retirement Group and its owners are not affiliated with any insurance companies.

E. OTHER AFFILIATIONS

Action Point Retirement Group LLC has an investment advisory relationship with Action Point Financial Planning dba Fiduciary Financial Advisors. This relationship does not create a material conflict of interest with clients.

11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION

Action Point Retirement Group's Code of Ethics establishes ideals for ethical conduct upon fundamental principles of openness, integrity, honesty, and trust. Action Point Retirement Group will provide a copy of its Code of Ethics to any client or prospective client upon request.

The Action Point Retirement Group's Code of Ethics covers all supervised persons and it describes its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Action Point Retirement Group must acknowledge the terms of the Code of Ethics annually, or as amended.

B. MATERIAL INTEREST IN SECURITIES

Action Point Retirement Group and the owners do not have a material interest in any securities.

C. INVESTING IN OR RECOMMENDING THE SAME SECURITIES

Action Point Retirement Group advisors are permitted to engage in personal securities transactions. These transactions create potential conflicts of interest if they were to trade in advance in a security that is owned by a client or considered for purchase or sale on behalf of a client. Action Point Retirement has adopted policies and procedures that are reasonable designed to effect transactions for the client in a manner consistent with the fiduciary duty owed to each client. The Action Point Retirement Group staff who buys or sells the same securities bought or sold for a client may do so only if they comply with the firm's written policies.

D. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

As further detailed in our Code of Ethics, Action Point Retirement Group, LLC associates may not engage in principal transactions between a personal account (including the account of a family member) and an account maintained by or for the benefit of any Action Point client. Employees may not arrange a cross transaction between one client account and another account if Action Point, any employee, or affiliate will receive any compensation for acting as

the broker (agency cross transaction).

12. BROKERAGE PRACTICES

A. CUSTODIANS AND BROKERS, WE USE

Action Point Retirement Group, LLC does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw advisory fees from your account (see Item 15 - Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Charles Schwab as the qualified custodian. Action Point Retirement Group, LLC is independently owned and operated and is not affiliated with Charles Schwab. Charles Schwab will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we recommend that you use Charles Schwab as custodian/broker, you will decide whether to do so and will open your account by entering into an account agreement directly with them. Action Point Retirement Group, LLC does not open the account for you, although we may assist you in doing so.

B. RECOMMENDATION CRITERIA

Action Point Retirement Group seeks to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. Action Point considers a wide range of factors, including:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services.
- Capability to facilitate timely transfers and payments to and from accounts.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.

C. BROKERAGE AND CUSTODY COSTS

For our clients' accounts that Charles Schwab maintains, these custodians generally do not charge you separately for custody services, but are compensated as part of their platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having Charles Schwab execute trades is consistent with our duty to seek “best execution” of your trades.

D. RESEARCH AND SOFT DOLLARS

“Soft dollars” are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to

pay for these types of services. Action Point Retirement Group does not receive “soft dollars” from any vendor, service provider or custodian.

i. BROKERAGE FOR CLIENT REFERRALS

Action Point Retirement Group does not receive client referrals or any other incentive from any broker-dealer or custodian.

ii. DIRECTED BROKERAGE

Some clients may direct Action Point Retirement Group to use a specific broker-dealer to execute securities transactions for their accounts. When so directed, the Advisor may not be able to effectively achieve best execution on clients’ transactions.

E. TRADE AGGREGATION

Action Point Retirement Group may aggregate orders with respect to the same security purchased for different clients. When orders are aggregated, each participating account receives the average share price for the transaction and bears a proportionate share of all transaction costs, based upon each account’s participation in the transaction, subject to our discretion depending on factual or market conditions. Clients participating in block trading may include proprietary or related accounts. Such accounts are treated as client accounts and are neither given preferential nor inferior treatment versus other client accounts. Allocations of orders among client accounts must be made in a fair and equitable manner.

13. REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

Action Point will review and rebalance client accounts on at least an annual basis. Action Point Retirement Group’s review process for its institutional clients typically includes a review of the plan’s expenses, style consistency, and performance relative to market benchmarks. Action Point will also review the asset manager’s adherence to the client’s stated investment objectives and performance relative to the manager’s peer group.

B. OTHER REVIEWS

Reviews may also be triggered by events within client’s lives, as well as pertinent news events, changes in federal and state regulatory or tax regimes, and overall economic events.

C. REPORTS

Clients with accounts under management by Action Point Retirement Group will receive at least a quarterly report from the qualified custodian which will include valuations as of the end of each quarter along with current asset allocations.

14. CLIENT REFERRALS AND OTHER COMPENSATION

A. OTHER COMPENSATION

Action Point Retirement Group does not receive extra compensation or any other economic benefit for providing investment advice or other advisory services to clients. Action Point Retirement Group does not receive a non-economic benefit for Charles Schwab in the form of the support they make available to us and other independent investment advisors whose clients

maintain their accounts at this custodian. The availability for us to use Charles Schwab's services is not based on us giving particular investment advice, such as buying particular securities for our clients.

B. CLIENT REFERRALS

Action Point Retirement Group does not pay for client referrals or use solicitors.

15. CUSTODY

All client funds, securities and accounts are held at third-party custodians. Action Point Retirement Group does not take possession of a client's funds, securities or accounts. However, portfolio management clients will be asked to authorize Action Point with the ability to deduct its fees directly from the client's account. This authorization will apply to the Action Point Retirement Group management fees only. A client may cancel Action Point's ability to deduct the fees from the Account by notifying Action Point Retirement Group or the custodian at any time. The Account's custodian will send a quarterly account statement, indicating the amount of fees withdrawn from the client's Account. Action Point urges clients to carefully review their statements and notify the firm of any discrepancies as soon as possible.

16. INVESTMENT DISCRETION

Action Point Retirement Group offers both discretionary and non-discretionary investment management services. The discretionary investment management is granted when a client signs an investment management agreement. The investment management agreement contains a limited power of attorney that allows the firm to select the securities to be bought and sold and the amount of securities to be bought and sold in the client's account. It also allows the firm to place each such trade without the client's prior approval. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account, and any other investment policies, limitations or restrictions.

When a client selects non-discretionary investment management services, the client retains full discretion to supervise, manage, and direct the assets of the account. The client will be free to manage the account with or without the Action Point Retirement Group's recommendation and all with or without the Advisor's prior consultation.

17. VOTING CLIENT SECURITIES

Action Point Retirement Group does not vote proxy. Clients will receive proxy materials directly from their account's custodian. Any proxy solicitation materials received by Action Point Retirement Group will be forwarded to clients for response and voting. In the event a client has a question about a proxy solicitation, the client should contact his/her investment adviser representative.

18. FINANCIAL INFORMATION

A. BALANCE SHEET

Action Point Retirement Group does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

B. FINANCIAL CONDITION

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the Advisor's financial condition. Action Point Retirement Group has no financial commitment that impairs its ability to service its clients.

C. BANKRUPTCY

Action Point Retirement Group, its owner and its investment adviser representatives have not been the subject of a bankruptcy proceeding.

19. REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Action Point Retirement Group has one principal executive officer (management person), Aaron Wassenaar, Mr. Wassenaar's biographical information is provided in the attached Brochure Supplement document.

Action Point Retirement is required to disclose additional information if charging performance-based fees, have any relationship or arrangement with an issuer of securities, or ever found liable in an arbitration, civil, self-regulatory organization or administrative proceeding. As none of these apply to Action Point Retirement Group, its management persons and investment advisor representatives have no information to disclose these matters.

A. EXECUTIVE OFFICERS AND MANAGEMENT

Aaron Wassenaar

Education: *University of Phoenix* – B.S. in Business Administration

Business Background:

Action Point Financial Planning, LLC - April 2024 - present

Action Point Retirement Group, LLC – November 2015 to Present

- Investment Adviser Representative

Action Point Financial Planning, LLC – September 2014 to November 2015

– Investment Adviser Representative

Oppenheimer & Company, Inc. – July 2011 to July 2014

– Registered Representative

– Investment Adviser Representative

Merrill Lynch, Pierce, Fenner & Smith Inc. – November 2009 to July 2011

– Registered Representative

– Investment Adviser Representative

Waddell & Reed, Inc.

– Registered Representative – July 2008 to November 2009

– Investment Adviser Representative – August 2008 to November 2009

Edward Jones

– Registered Representative – August 2007 to July 2008

B. OTHER BUSINESS ACTIVITY

The owner does not have any other business activities.

C. PERFORMANCE BASED COMPENSATION

The owner does not receive performance-based fees or any other compensation or incentives.

D. DISCIPLINARY HISTORY

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Action Point Retirement Group, its owners, and its investment advisor representatives have not been the subject of any legal or disciplinary events.

E. ADDITIONAL RELATIONSHIPS WITH ISSUERS OF SECURITIES

Registered investment advisers are required to disclose all material facts regarding any relationship with an issuer of securities. Neither Action Point Retirement Group nor the owners have a relationship with an issuer of securities. Therefore, no information is applicable to this Item.