Part 2A of Form ADV: Firm Brochure



Grosse Point Capital Management
909 Davis Street, Suite 500
Evanston, IL 60201
CRD No. 310057

This brochure provides information about the qualifications and business practices of Grosse Point Capital Management. If you have any questions about the contents of this brochure, please contact us at (847) 550-7100 and/or michael@grossept.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Additional information about Grosse Point Capital Management also is available on the SEC's website at www.adviserinfo.sec.gov.

Grosse Point Capital Management' registration as an investment adviser does not imply a certain level of skill or training.

Effective Date: August 16, 2026

Item 2 Material Changes

Last Annual Update: N/A

Summary of Material Changes

This section will be updated as required in the event any material changes are made to the Grosse Point Capital Management Firm Brochure (the “Brochure”):

- There are no material changes to report currently.

Delivery Requirements

A complete copy of our current Form ADV Part 2A and/or 2B may be requested free of charge by contacting us by telephone at (847) 550-7100 or by email at michael@grossept.com.

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FIRM DESCRIPTION

Grosse Point Capital Management (hereinafter referred to as “we,” “us,” “Adviser,” or “our firm”) is an Illinois limited liability company with its principal office located in Evanston, Illinois. The sole Managing Member of our firm is Michael Bloom.

As a registered investment adviser, we are a fiduciary to you, our client, meaning we have a fundamental obligation to act and provide investment advice that is in your best interest. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you in this Brochure. We urge you to review this Brochure carefully and consider our qualifications, business practices and the nature of our advisory services before becoming our client.

Grosse Point Capital Management was established September 15, 2020.

ADVISORY PROGRAMS

Grosse Point Capital Management provides investment management services to our clients. In connection with our investment management services, Grosse Point Capital Management provides advice with respect to a broad range of asset classes, including equities (common stocks and equivalents), mutual funds, exchange traded funds, and fixed income instruments. Our advice is generally limited to these types of investments, but we reserve the right to advise or not advise our clients on certain other investments should we deem it appropriate based on their circumstances.

Grosse Point Capital Management’ advisory services are tailored to the needs of our clients based on their individual investment objectives, risk tolerance, cash or income needs, and any investment restrictions. Although Grosse Point Capital Management seeks to accommodate any reasonable investment restrictions or guidelines set by our clients, we may decline to accommodate certain investment restrictions that are incompatible with our firm’s investment philosophy or that may have an adverse effect on our ability to manage your account.

Grosse Point Capital Management enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory services (the “Investment Management Agreement”). The Investment Management Agreement sets forth the scope of the services to be provided and the compensation we receive from the client for such services. The Investment Management Agreement may be terminated by either party in writing at any time by giving thirty (30) days signed written notice to the other party.

Our advisory services are offered through certain individuals who have registered with Grosse Point Capital Management as its investment adviser representatives (“advisors”).

Clients should refer to such advisor's Form ADV Part 2B (the "Brochure Supplement") for more information about their qualifications.

Our advisors offer the advisory services described below to our clients:

Investment Management. Grosse Point Capital Management provides investment management services in which clients grant our firm the ability to utilize discretion in managing the Client's investment account. Specifically, the client grants our firm full power to direct, manage, and change the investment and reinvestment of the assets in the account, the proceeds, and any additions. Our authority over the client's investments includes discretionary authority to purchase and sell securities for the client's account, to submit aggregated trade orders for the client and others to obtain best execution, and to give instructions concerning these transactions to the qualified custodian with which the client's account(s) are held. We are not required to first consult with the client before placing any specific order or obtain specific authorization from the client for each specific transaction. Grosse Point Capital Management receives discretionary authority from our clients through our Investment Management Agreement at the outset of our advisory relationship.

Individual Retirement Accounts. Grosse Point Capital Management also provides advisory services for individual retirement accounts ("IRAs"). Investors considering rolling over assets from a qualified employer-sponsored retirement plan ("Employer Plan") to an IRA should review and consider the advantages and disadvantages of an IRA rollover from their Employer Plan. A plan participant leaving an employer typically has four options (and may engage in a combination of these options): (1) Leave the money in the former employer's plan, if permitted; (2) Rollover the assets to a new employer's plan (if available and rollovers are permitted); (3) Rollover Employer Plan assets to an IRA; or, (4) Cash out the Employer Plan assets and pay the required taxes on the distribution. At a minimum, Investors should consider fees and expenses, investment options, services, penalty-free withdrawals, protection from creditors and legal judgments, required minimum distributions, and employer stock. Grosse Point Capital Management encourages you to discuss your options and review the above listed considerations with an accountant, third-party administrator, investment advisor to your Employer Plan (if available), or legal counsel, to the extent you consider necessary.

By recommending that you rollover your Employer Plan assets to an IRA, Grosse Point Capital Management may earn asset-based fees as a result. In contrast, leaving assets in your Employer Plan or rolling the assets to a plan sponsored by your new employer likely results in little or no compensation to Grosse Point Capital Management. Grosse Point Capital Management has an economic incentive to encourage investors to rollover Employer Plan assets into an IRA managed by Grosse Point Capital Management. Investors may face increased fees when they move retirement assets from an Employer Plan to a rollover IRA account.

We generally do not manage accounts on a non-discretionary basis.

Financial Planning and Consulting. Grosse Point Capital Management provides financial planning and consulting services where the advisor will work with clients to review their current financial position, stated goals and objectives and will make recommendations on how clients can manage their financial resources based on an analysis of their individual needs. Recommendations may be in the form of a written financial plan or a verbal consultation based on the type of engagement. The client is under no obligation to act upon the advisor's recommendations. If the client elects to act on any of our recommendations, the client is under no obligation to affect their transactions through our firm.

Financial Planning Services. Grosse Point Capital Management provides financial planning services where the advisor will work with clients to review their current financial position, anticipated future financial positions, stated goals and objectives for spending and saving. The advisor will develop a written financial plan based on the client's needs, organizing their finances and recommending certain steps to reach the client's stated goals for current and future spending and saving. Upon completion of the financial plan development the advisor will meet with the client to present a written copy of the plan and answer any questions the client may have. The client is under no obligation to act upon their advisor's recommendations. If the client elects to act on any of our recommendations, the client is under no obligation to effect their transaction through our firm.

Financial Consulting Services. Grosse Point Capital Management provides financial consulting services where an advisor will work with clients to update their financial plan on a continuous basis to reflect changes in client circumstances, goals and financial behaviors. Clients will engage Grosse Point Capital Management to advise on the financial merits of a proposed transaction, taking clients financial goals, risk management, tax status, and future earnings into account. Quarterly meetings with clients will identify any such changes, and clients will work with an advisor to update the financial plan accordingly with revisions to any of the following: net worth, cash flow, debt management, college savings, credit scores, estate planning, financial goals, insurance, investments, mortgage analysis, real estate ownership analysis, retirement planning, risk management, and tax strategies.

In addition to dynamic updates to the financial plan, clients utilizing on-going financial consulting services will have access to Grosse Point Capital Management to ask for advice on an on-going basis, and client will be called in the event of changes to tax or business regulations which may affect their ongoing financial plan.

These services do not include investment implementation or on-going investment supervision, monitoring, or reporting services.

Investment management services may be obtained from Grosse Point Capital Management through a separate investment management agreement, or a separate professional investment advisor of the client's choosing. Grosse Point Capital Management may recommend to its financial planning and financial consultation clients that they retain the Firm as their investment advisor to implement its recommendations and such recommendation may be viewed as a conflict of interest. Financial planning and financial consultation clients are hereby advised that they are under no obligation to act on Grosse Point Capital Management' investment recommendations. Moreover, if a client elects to act on any of the recommendations, the client is under no obligation to effect the transactions through Grosse Point Capital Management.

Information related to tax and legal consequences that is provided as part of the financial plan is for informative purposes only and should not be considered tax or legal advice. Clients should contact their tax and/or legal advisor for personalized advice.

Wrap Fee Programs. Grosse Point Capital Management does not participate in any wrap fee programs.

Important Note: It is the client's responsibility to ensure that Grosse Point Capital Management is promptly notified if there are ever any significant changes to their financial situation, goals, objectives or needs so we can review our previous recommendations and make any necessary adjustments.

Item 5 Fees and Compensation

ADVISORY FEES

The following information describes how Grosse Point Capital Management is compensated for the advisory services we provide to our clients. The specific fees are charged and the compensation we receive may differ between clients depending upon the individual Investment Management Agreement with each client. Grosse Point Capital Management reserves the right to negotiate our compensation with clients depending on the scope of our advisory relationship, and we may charge higher or lower fees than are available from other firms for comparable services. Fees are negotiated with each client based on a variety of factors, such as the amount of assets being managed, future deposits to the accounts under our management, the level and type of services provided and/or the nature of the relationship with the client. Grosse Point Capital Management has the general discretion to waive all or a portion of our fees.

Investment Management Fees. In consideration for providing investment management services and pursuant to the Investment Management Agreement, Grosse Point Capital Management charges clients an annual asset-based fee ranging from .3% to .9% based on the client's assets under management ("AUM") as valued by the custodian. Please refer to the following fee schedule:

Fee Breakdown	
Assets Under Management	**Fee %**
Up to $1,000,000	.9
Next $1,000,000	.7
Next $3,000,000	.5
Above $5,000,000	.3

Grosse Point Capital Management generally bills our investment management fees on a quarterly basis in arrears. Clients must authorize the deduction of our fees from their managed accounts by the qualified custodian, Charles Schwab or Interactive Brokers, and choose the method by which our fees will be calculated. Clients may elect to have our advisory fees calculated by our firm or our custodians and deducted from their accounts. The client makes this election when applying for their account at Schawn Advisory or Interactive Brokers or at any time or cancel the existing arrangement. All fees will be supported by an invoice to the client itemizing the fee.

Financial Planning and Consulting Fees. Grosse Point Capital Management charges a flat fee for financial planning and financial consulting services. Our financial planning and consulting fees are billed separately as unique services. The total estimated fee, as well as the ultimate fee that we charge the client is based on the scope and complexity of the services provided.

> **Financial Planning Fees.** Our Financial Planning fee is $2,500 to $10,000 for a financial plan on a stand-alone basis. Our Financial Planning Fee is invoiced to the Client upon completion and presentation of the Client's financial plan and due to Advisor within thirty (30) days of the invoice date. Financial planning services will be considered complete at the presentation of the final plan, at which point a copy of the plan will also be provided to the client. Grosse Point Advisor financial planning fees are a function of engagement scope, duration, and complexity.
>
> All financial plans include: a comprehensive risk assessment and review using the Grable Lytton psychometric methodology, including review of any mismatch among a client's tolerance, capacity, and requirements for risk; the corresponding asset allocation and retirement plan centered on Grosse Point Advisor's proprietary asset allocation and asset-class forecasting methodologies; and, when required, an education, life, disability income and long-term care insurance plan.
>
> Ongoing planning is available, with quarterly asset allocation and asset-class forecast updates, and daily asset updates, including from externally held investment accounts, through the RightCapital financial planning software aggregation portal.
>
> Additional planning options include estate planning, such as revocable and irrevocable trust, discounted giving, family limited partnership, and private

foundation planning; business planning, including business succession, key person, buy-sell, executive bonus, and supplemental executive retirement planning; business valuation forecasts using the BizEquity model; and coordination of planning among key participants and advisors.

Financial Consulting Fees. We charge $2,500 to $10,000 for financial consulting services. Our Financial Consulting Fee is invoiced to the Client upon completion of service and due to Advisor, within thirty (30) days of the invoice date. Financial consulting services will be complete upon a final meeting to establish the client's independent forward action plan and will take place at the client's request to end the consulting relationship, which is at the discretion of the client.

We also have discretion to completely waive the planning fees for certain clients based on the amount of the client's assets already managed by our firm which would justify a fee waiver.

Annuitized Variable Income Management Fees. In consideration for providing annuitized variable income services and pursuant to the Investment Management Agreement, Grosse Point Capital Management charges clients an annual asset-based fee ranging from .5% to 1.1% based on the client's assets under management ("AUM") as valued by the insurance carrier. Please refer to the following fee schedule:

Fee Breakdown	
Assets Under Management	**Fee %**
Up to $500,000	1.1
Next $1,000,000	.9
Next $3,000,000	.7
Above $5,000,000	.5

Grosse Pointe Capital Management bills advisory fees for annuitized variable income services annually in advance, followed by quarterly billing in arrears. Fees are calculated based on the initial variable income contract premium, referred to as the "Advisory Base." In subsequent years, the Advisory Base is decreased by the prior year's variable payments, and investment performance relative to the Assumed Interest Rate ("AIR"), resulting in an increase or decrease in the Advisory Base used to calculate the following year's advisory fee.

Clients must authorize fiduciary access to the insurance carrier and establish a separate investment account for payment of advisory fees. The account will generally be managed at an asset allocation comparable to the allocation selected for the variable annuity's separate accounts.

If these arrangements are not established, clients will instead be assessed a one-time advisory fee of 1.3%, payable in advance. The minimum annual advisory fee is $1,750. All advisory fees will be supported by an invoice entailing the fee.

Additional Fees and Expenses. Clients may incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the qualified custodian through which account transactions are executed. For more information on our brokerage practices, please refer to the “Brokerage Practices” section of this Brochure.

The fees that clients pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund’s prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by mutual funds, exchange traded funds, our firm, and others.

Termination. The Investment Management Agreement with our Clients may be terminated by either party at any time upon thirty (30) days written notice. Upon termination of our status as the client’s investment adviser, Grosse Point Capital Management will not take any further action with respect to the client’s account(s) unless specifically notified by the client in writing. Clients will be responsible for instructing their custodian and monitoring their account for the final disposition of assets.

Refunds. Grosse Point Capital Management does not require that our clients pay our fees in advance. Upon receipt of a proper notice of termination from the client, as described in the Engagement Agreement, any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

Brokerage Commissions. Grosse Point Capital Management does not receive brokerage commissions from the sale of securities or other investment products. Our compensation for recommending securities and investment products is limited to the advisory fees described above.

ERISA Accounts. Grosse Point Capital Management is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include, among other things, restrictions concerning certain forms of compensation.

Any material conflicts of interest between clients and Grosse Point Capital Management or our employees are disclosed in this Brochure. If at any time, additional material conflicts of interest develop, Grosse Point Capital Management will provide our clients with written notification of those material conflicts of interest or an updated Brochure.

Item 6 Performance-Based Fees

PERFORMANCE BASED FEES

Other than annuitized variable income management fees from variable contracts. Grosse Point Capital Management does not charge our clients fees based on a share of capital gains on or capital appreciation of the assets in their accounts.

Item 7 Types of Clients

TYPES OF CLIENTS

Grosse Point Capital Management offers investment advisory services on a discretionary basis to the following types of clients: individuals and high net worth individuals. Client relationships may vary in scope and length of service.

ACCOUNT REQUIREMENTS

Grosse Point Capital Management generally requires a minimum account balance of $500,000 for our investment management services. However, Grosse Point Capital Management in its sole discretion may waive or lower our minimum account balance requirement based on various criteria (i.e., anticipated future additional assets to be managed, related accounts, account composition, negotiations with the client, etc.).

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

Advisers employ a wide range of methods to manage portfolios and evaluate investments. Advisers primarily use an investment approach based on Modern Portfolio Theory. Adviser bases its recommendations on asset allocation methods consistent with Modern Portfolio Theory. This method combines specific asset classes, which may behave differently from each other, into one portfolio for the purpose of reducing the overall portfolio's volatility. Advisers use domestic and international equity asset classes and domestic and global fixed income asset classes. Advisers primarily use no-load institutional mutual funds and/or ETFs to implement its recommendations. Adviser does not provide advice for buying or selling any individual equity security, other than open-ended mutual funds and ETFs, except when the client requests our opinion.

Adviser analyzes mutual funds and ETFs recommended to clients based on a fund's total operating expense ratio, portfolio turnover, investment objective and investment restrictions and limitations. Adviser typically recommends that clients invest in ETFs and no-load mutual funds advised by investment managers such as Dimensional Fund Advisors (DFA), Blackrock, State Street Global Advisors, and Vanguard, and other managers have low operating expenses, low portfolio turnover, below average capital gains distributions and a fundamental investment objective of investing primarily within a particular asset class.

DFA mutual funds are available for investment only by clients of Registered Investment Advisors who have been authorized by DFA to use their funds for the benefit of Adviser's clients. This means that you will not be able to make additional investments in DFA funds if you terminate your agreement with Adviser, except through another adviser authorized by DFA.

Adviser, in its sole discretion, will periodically recommend or execute transactions to rebalance client portfolios to more accurately reflect the target allocation that was originally agreed upon by the client and Adviser. When making investment decisions Adviser uses academic research, syndicated assumptions, expectations and projections, financial newspapers, and magazines, annual reports, prospectuses, filings with the SEC and information obtained from historical performance database software (including that provided by Dimensional Fund Advisors (DFA), the BlackRock Investment Institute, the State Street Investment Solutions Group, the Federal Reserve, the Federal Reserve Bank of Cleveland and the Social Security Office of the Chief Actuary). Before recommending rebalancing transactions, or rebalancing a client's account on discretion, Adviser will generally consider the economic effect of tax considerations and transaction costs and will only recommend rebalancing or act on discretion to rebalance an account when Adviser believes the benefits outweigh the impact of transaction costs and taxes.

We believe in diversified asset class exposure obtained primarily through a diversified mix of low-cost mutual funds and ETFs that represent desired asset classes. Mutual funds and ETFs recommended and used by Adviser typically invest the following types of securities:

- U.S. Stocks of any market capitalization
- Foreign Stocks, including Emerging Markets
- Investment Grade Fixed Income Securities
- Non-Investment Grade Fixed Income Securities
- U.S. Government and Government Agency Securities
- Derivatives
- Hedge Funds (Investment Company Act of 1940 securities)
- Real Estate Investment Trusts (Domestic and Foreign)
- Infrastructure
- Gold

Asset allocation models and specific funds recommended to clients typically are set forth in the client Investment Objective Confirmation letter. Advisers primarily recommend low-cost mutual funds and ETFs because mutual funds and ETFs can provide a diversified portfolio that is designed to limit the impact of large fluctuations in values of individual stocks and bonds. Mutual funds and ETFs do not offer protection from market volatility. At times, different funds are recommended or selected to modify current client portfolios. Upon the request of a client, Adviser may agree to provide a limited review of client assets for which we do not have discretionary authority in the context of the plan. Advisers invest for the long-term and do not engage in market timing.

Advisers generally do not recommend individual stocks or bonds, but certain exceptions will be made in cases where the stocks were obtained before becoming a client or are requested by the client. We monitor individual stock exposure in the overall portfolio.

We give advice and act with respect to other clients that is often different from the advice, timing and nature of action taken with respect to your account. Timing, allocation, and types of investments are determined considering each client's personal situation.

Advisers typically use long-term investment strategies to implement investment advice given to clients. In certain circumstances Adviser will utilize a dollar cost averaging strategy. A long-term purchase strategy generally assumes the financial markets will go up in the long term, which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing long-term investments may involve an opportunity cost – that of "locking-up" assets that may be better utilized in the short-term for other investments.

RISK OF LOSS

Investment returns are not guaranteed, and our clients may lose money on their investments. We ask that our clients work with the portfolio manager to help understand the clients' tolerance for risk. Our securities analysis and investment strategy methods rely, where possible and as appropriate, on credit ratings prepared by independent rating agencies and on financial statements audited by independent public auditors. We assume that rating agencies and auditors are in fact independent and that they perform their services in accordance with applicable legal and professional standards. In addition, we rely on company management, investment banks, and attorneys to make accurate and unbiased representations about these securities in public filings and other publicly available information. We believe this data has been obtained from sources believed to be reliable and is accurate to the best of our knowledge. However, we recognize that some data may be incorrect and there is always a risk that our analysis will be compromised by inaccurate or misleading information, or that unanticipated circumstances will lead to unanticipated adverse results. Risks of loss may also arise from unanticipated circumstances.

The investment risks described below may not be all-inclusive but should be considered carefully:

Equities risk: Equity securities can decline in value over short or extended periods as a result of changes in a company's financial condition and in overall market, economic and political conditions.

Market Risk: Security prices may decrease due to direct and indirect events and market conditions, usually caused by factors independent of the specific attributes of the investment security.

Inflation Risk: Rising inflation reduces the purchasing power of the underlying currency, which is the dollar for U.S. based investments. This also applies to foreign investments, which may be denominated in other currencies.

Liquidity Risk: Liquidity is the ability to convert an investment into cash. Investment assets are usually more liquid when established markets exist to trade those securities. For instance, U.S. Treasury bills and most equity securities have highly developed markets, while tangible property, such as real estate and precious stones, are less liquid. In case of extreme market activity, we may be unable to liquidate investments in thinly traded and relatively illiquid securities promptly if necessary. Also, sales of thinly traded securities could depress the market value of those securities and reduce the investments' profitability or increase their losses.

Reinvestment Risk: This is the risk that future gains may be reinvested at less favorable (lower) rates of return than currently available.

Interest-Rate Risk: Changes in interest rates may result in fluctuations in the prices of other investment vehicles. For example, when interest rates rise, fixed income security prices fall.

Financial Risk: Excessive use of credit (borrowing) to finance a business' operations increases the risk of profitability, because the company must cover its debt obligations in good and bad years.

Corporate Securities: Equity and debt securities (stocks and bonds) represent partial ownership interests in companies and partial claims on their assets, respectively. The value of these interests and claims is theoretically dependent upon the performance of the underlying business and the cash flow generated by its operations. However, securities prices may fluctuate independently of these factors due to market factors or for no reason at all. Prices may not change as expected even when the prospects of the business have been correctly assessed.

Omission of Risks: This Brochure does not provide a comprehensive list of every possible source of risk. Every potential outcome of an investment cannot be predicted, and it cannot disclose every potential risk factor for every investment to clients. The value of securities that the Firm invests in may go up or down in response to factors not within our firm's control, including but not limited to the status of an individual company underlying a security, or the general economic climate. Clients may suffer losses for any reason or no discernible reason.

Business Risks: The companies identified for investment face a wide variety of operational risks, including competitive threats, regulatory changes, execution challenges, and responses to external changes. For businesses listed on US exchanges, the Securities and Exchange Commission requires companies to disclose the most significant risk factors that could impact on the business. However, these disclosures could be incomplete or inaccurate. An assessment of the relevant risk factors for any business could be incomplete or inaccurate. Both unforeseen and known risk factors may transpire, resulting in a deterioration of corporate performance.

Fundamental Analysis: Forecasting financial performance is an inexact process of estimation that relies on the accuracy of financial and industry data provided by companies and third parties. This data may contain material errors or omissions. Investing based on fundamental research may also result in errors of judgment or analysis. Investment performance may suffer if the assessment of a business or its prospects is incorrect, and even a correct analysis could result in a loss of capital.

Interim Underperformance: The long-term and concentrated nature of a strategy means that even if the strategy is "working properly" and the analysis is correct and leads to profitable realized outcomes, clients may experience multi-year periods of significant underperformance relative to market indexes and other investment strategies. This interim underperformance poses a significant risk of permanent capital loss for clients with short time horizons or who require withdrawals from their account.

Systemic Risk: Our firm relies on the stability of the overall financial system to implement its investment strategy. The security of client assets depends on the solvency of a third-party custodian and brokerage firm, upon which the Firm also relies for prime brokerage and trading services. In the event of a disruption to the custodian's business or the overall functioning of securities markets, the Firm may be unable to implement its investment strategy and clients may experience a significant or complete loss of their capital.

Strategy: The Firm cannot guarantee that its strategy will be always implemented, or in full. The Firm has full discretion and a broad mandate, and it may make investments not in keeping with the general description provided in this Brochure. There can be no guarantee that suitable investment opportunities will be always available.

Management: The Firm is dependent on the services of its Managing Member. If he were incapacitated or otherwise unable to continue providing services, the Firm would not be able to continue to implement its strategy, and clients could experience a significant or total loss of capital.

Frequent Trading: Although many of the Firm's investments are long-term in nature, any capital gains due to positions held for less than one year may be taxable at a higher rate. Frequent trading could result in lower returns due to these costs.

Public Health Crisis Risks: A public health crisis, pandemic, epidemic or outbreak of a contagious disease, such as the recent outbreak of Coronavirus (or COVID-19) in China, the United States, Europe, and other countries, could have an adverse impact on global, national and local economies, which in turn could negatively impact our investments and strategies. Disruptions to commercial activity resulting from the imposition of quarantines, travel restrictions or other measures, or a failure of containment efforts, may adversely affect our investments in various ways, including but not limited to, decreased demand, supply chain delays, disruptions or staffing shortages. The outbreak of Coronavirus has contributed to, and may continue to contribute to, volatility in financial markets, including market liquidity and changes in interest rates. A continued outbreak may have a material and adverse impact on our investment returns. The impact of a public health crisis such as the Coronavirus (or any future pandemic, epidemic or outbreak of a contagious disease) is difficult to predict, which presents material uncertainty and risk with respect to the performance of our investments and strategies.

Investors should be aware their investment is not guaranteed and should understand that there is a risk of loss of value in their investment. Investors should be prepared to bear those losses.

Item 9 Disciplinary Information

REQUIRED DISCLOSURES

We are required to disclose all material facts about any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

OUTSIDE BUSINESS ACTIVITIES

At present, Mr. Bloom, in his individual capacity, is an insurance professional. Mr. Bloom, in his capacity as an insurance professional, may recommend, on a fully disclosed commission basis, the purchase of certain insurance products. A conflict of interest exists to the extent that our firm recommends the purchase of insurance products where Mr. Bloom receives insurance commissions or other additional compensation. Our clients are not obliged to use the various insurance agencies Mr. Bloom may recommend when purchasing any insurance products.

Neither Grosse Point Capital Management nor any of its employees are registered, or have an application pending to register, as a broker-dealer or registered representative of a broker dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Lastly, Mr. Bloom offers through AssumeSmart non-advisory subscription access to his proprietary capital market and financial planning assumptions.

AFFILITIATED ENTITIES

GP Insurance Brokerage

GP Insurance Brokerage is an affiliate of Grosse Pointe Capital Management through common ownership by Mr. Bloom. GP Insurance Brokerage is an insurance brokerage that may receive commissions or other compensation from insurance carriers in connection with the placement of insurance products.

Grosse Pointe Capital Management does not receive any portion of compensation paid to GP Insurance Brokerage in connection with insurance products. Clients are not required to purchase insurance products through GP Insurance Brokerage or any other insurance agency recommended by Mr. Bloom and are free to obtain insurance products through other providers.

OTHER INVESTMENT ADVISERS

Grosse Point Capital Management does not recommend or select other investment advisers for clients and as such does not receive compensation directly or indirectly from those advisers that creates a material conflict of interest.

Certain third-party investment advisers may act as a solicitor for Grosse Point Capital Management and for these services receive a portion of the fees paid by clients to Grosse Point Capital Management. All third-party investment advisers may receive from Grosse Point Capital Management and the written separate disclosures made to clients regarding these fees comply with all applicable federal and/or state statutes and rules. The written disclosures clients are provided with include a copy of the Grosse Point Capital Management' Form ADV Part 2A and any relevant brochures, a disclosure statement detailing the fees third-party investment advisers acting as solicitors may be paid and a copy of Grosse Point Capital Management' privacy policy.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

CODE OF ETHICS

Grosse Point Capital Management has adopted a Code of Ethics (the "Code") that sets forth a standard of business conduct for our firm and all our associated persons. The purpose of the Code is to set out ideals for integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence for our firm and our associated persons to espouse in the interest of our clients and investor protection. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, 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 employees of Grosse Point Capital Management are required to handle their personal securities transactions in such a manner as to avoid any actual or potential conflicts of interest or any abuse of position of trust and responsibility. Annually, we require all employees to certify that they have read, understand, and will comply with the Code.

Clients and prospective clients may request a full copy of our firm's Code of Ethics by contacting our firm in writing at michael@grossept.com or calling our firm at (847) 550-7100.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Grosse Point Capital Management and/or our advisors may invest in the same securities that are recommended to and/or purchased for our clients. Conflicts of interest may arise when Grosse Point Capital Management can trade the same securities that are recommended to and/or purchased for our clients ahead of executing clients' orders, in favor of Grosse Point Capital Management. That is because Grosse Point Capital Management possesses proprietary information as to the positions and volumes of securities in clients' accounts. Grosse Point Capital Management and/or our advisors do not recommend securities to our clients in which Grosse Point Capital Management

and/or our advisors has a material financial interest. Grosse Point Capital Management and/or our advisors may invest in securities at or about the same time as our clients.

Grosse Point Capital Management addresses these conflicts in several ways, including disclosure of conflicts in this Brochure. In addition, Grosse Point Capital Management has adopted a compliance manual which establishes several restrictions, procedures and disclosures designed to address potential conflicts of interest and to assure that the personal securities transactions, activities and interests of Grosse Point Capital Management and/or our advisors will not interfere with our ability to make investment decisions in the best interest of our clients.

PERSONAL TRADING

Grosse Point Capital Management maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by our firm or any access persons of our firm with regards to their personal securities transactions. Personal trading activities are continually monitored to reasonably prevent conflicts of interest between our firm and our clients.

Item 12 Brokerage Practices

SELECTION OF BROKER-DEALERS

Securities transactions are generally conducted through Interactive Brokers, LLC. (“Interactive Brokers”), member FINRA/SIPC/NYSE and/or Charles Schwab & Co., Inc. (“Charles Schwab”), member FINRA/SIPC/NYSE. Interactive Brokers or Charles Schwab maintains custody of our clients’ assets and effects securities transactions for our investment management clients’ accounts. Grosse Point Capital Management is independently owned and operated and is not affiliated with or a related person of Interactive Brokers or Charles Schwab (hereinafter referred to as “our custodians”).

Grosse Point Capital Management considers several factors prior to recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, their commission rates or other fee schedules, their custodial services, their level of net capital (financial strength) and excess SIPC and other insurance coverage. The commissions charged by our custodians are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

Research and Other Soft Dollar Benefits. Our custodians offer products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), facilitate payment of our fees from clients' accounts, and assist with back-office functions, record keeping and client reporting. These services may be used to service all or a substantial number of client accounts, including accounts not maintained at our custodians.

Grosse Point Capital Management may also receive services from our custodians or their affiliates that are intended to help our firm manage and further develop our business. These services may include registration support through Greenwich Compliance, website design and technology support. Our custodians also have arrangements with various product vendors, which enable our firm to purchase their products at a discount. These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; and investment research.

Grosse Point Capital Management does not participate in any commission-sharing arrangements or receive soft dollar credits. While the benefits we receive from our custodians do not depend on the amount of brokerage transactions directed to our custodians, as a fiduciary we are required to disclose that there is an inherent conflict of interest when our firm recommends that clients maintain their assets at our custodians. These recommendations may be based in part on the benefits we receive from our custodians, such as the availability of the above-mentioned products and services, and not solely on our clients' interest in receiving most favorable execution. Nonetheless, we seek to ensure that the securities transactions effected for our clients represent the best qualitative execution, not just the lowest possible cost.

Our firm routinely compares order execution disclosure information at our custodians to other broker-dealers to ensure that our custodians remain competitive in providing best execution for our clients' securities transactions. Although the brokerage commissions and/or transaction fees charged by Interactive Brokers may be higher or lower than those charged by other broker-dealers, in seeking best execution for our clients our firm strives to ensure that our clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided by our custodians.

Brokerage for Client Referrals. Grosse Point Capital Management does not consider broker-dealer or third-party referrals in selecting or recommending broker-dealers to our clients as this would create a conflict of interest.

Directed Brokerage. While Grosse Point Capital Management generally recommends that clients direct transactions through certain broker-dealers, we do not have discretionary authority to determine the broker-dealer to be used for the purchase or sale

of securities for client accounts or the commission rates paid to a broker-dealer for client securities transactions.

In rare cases, Grosse Point Capital Management may utilize other broker-dealers when requested by the client. Clients of Grosse Point Capital Management must be aware that if they direct us to use a particular broker-dealer that it may limit our ability to achieve best execution or limit their participation in block trading. As a result, clients may pay higher commissions, have higher transaction costs, or receive less favorable prices. In situations where the client directs us to affect their transactions through a particular broker-dealer, we require such directions to be in writing.

TRADE AGGREGATION

Investment decisions deemed appropriate for one client may also be deemed appropriate for other clients so that the same security may be purchased or sold at or about the same time for more than one client. When this is the case, our firm may, but is not obligated to, aggregate similar trades for multiple clients and execute the trade as a single block.

When transactions are aggregated, the securities purchased or sold will be allocated in a fair and equitable manner. Our trade allocation procedures seek to allocate investment opportunities among our clients in the fairest possible way considering their best interests. These procedures ensure that allocations do not involve a practice of favoring or discriminating against any client or group of clients. Transactions are usually aggregated to seek a more advantageous net price and/or to obtain better execution for all clients. Nevertheless, there is no assurance that the aggregation of transactions will benefit all clients equally, and in some instances combined orders could adversely affect the price or volume of a security. Also, it is possible that we may not aggregate trades in circumstances where it would be beneficial to do so.

TRADE ERRORS

From time to time, our firm may make a trade error when servicing a client's account. When this occurs, we will correct the trade as soon as we discover the error. Trading errors will be corrected at no cost to clients. If there is a cost associated with this correction, such cost is borne by Grosse Point Capital Management and not the client. Note that we do not credit accounts for market losses unrelated to our error.

Item 13 Review of Accounts

ACCOUNT REVIEWS

Mr. Michael Scott Bloom, Managing Member and Chief Compliance Officer of Grosse Point Capital Management conducts account reviews on at least an annual basis for clients subscribed to our investment management services. The frequency of the review depends upon a variety of factors such as the client's risk profile, activity in the account,

economic and market conditions, and the client's preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Formal client review meetings are generally conducted on an annual basis at intervals mutually agreed upon by the advisor and the client. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

ACCOUNT REPORTS

Those clients to whom Grosse Point Capital Management provides investment management services receive at least quarterly reports from our firm summarizing their account(s) and investment results. Reports may be furnished in writing or electronically as requested by the client. Clients are urged to compare the account statements they receive from their custodian to any written reports received from our firm.

Clients have direct and continuous access to their account information and related documents via the password-protected website of the qualified custodian with which their accounts are held.

Item 14 Client Referrals and Other Compensation

CLIENT REFERRALS

Grosse Point Capital Management may, at times, enter soliciting agreements to provide cash compensation to third parties for client referrals or introductions to Grosse Point Capital Management. Our compensation agreements are in accordance with Rule 206(4)-3 under the Investment Adviser Act of 1940. To the extent required by Rule 206(4)-3 or applicable state regulations, the compensation is disclosed to clients by the third-party referral source in a separate disclosure document. Generally, these arrangements provide compensation equal to a specific percentage of certain fees received by Grosse Point Capital Management. This arrangement creates a conflict of interest in that cash compensation may impair the solicitor's evaluation of the client's suitability for Grosse Point Capital Management' programs. To mitigate or remedy this conflict of interest the Chief Compliance Officer will review referrals to ensure suitability with Grosse Point Capital Management' programs before compensating the solicitor. Grosse Point Capital Management will ensure that these individual solicitors are appropriately registered as investment adviser representatives if registration is required by the jurisdictions in which solicitation activities are conducted.

Certain clients that engage Grosse Point Capital Management' services because of referrals from Introducing Advisors may pay more or less to obtain Grosse Point Capital Management' investment management services than do other clients, since a portion of the overall fee may be determined by the Introducing Advisor. In such situations, where

the client pays more, the engagement shall result in an additional charge to the client more than the client would have paid if the client were to engage the services of Grosse Point Capital Management independent of the Introducing Advisor's introduction. Variations in the Introducing Advisor's compensation may be due to the Introducing Advisor's role as an unaffiliated investment adviser or investment adviser representative for the consulting and monitoring services the Introducing Advisor may provide to the client on an ongoing basis relative to the client's engagement of Grosse Point Capital Management. Such arrangements, and their terms and conditions, are exclusively determined between the client and the Introducing Advisor, and Grosse Point Capital Management will not be a party to these arrangements. Retail clients may pay to obtain Grosse Point Capital Management' investment management services than clients referred to Grosse Point Capital Management by an Introducing Advisor.

OTHER COMPENSATION

Grosse Point Capital Management does not receive an economic benefit from anyone who is not a client in exchange for our provision of investment advice or other advisory services apart from research or execution-related products or services that may be provided by the broker-dealer(s) that we use to execute client transactions. Please refer above to Item 12 of this Brochure for additional information on these products or services.

Item 15 Custody

CUSTODY OF CLIENT FUNDS AND SECURITIES

- Charles Schwab and Interactive Brokers are the qualified custodians and maintain custody of client funds in separate brokerage account(s) for each client under the client's name. Grosse Point Capital Management personnel may assist the client in preparing paperwork to open a new brokerage account at Charles Schwab or Interactive Brokers, but only the client is permitted to authorize, by their signature, the opening of the account. Charles Schwab and Interactive Brokers send an account-opening letter to each client at their physical mailing address after the account is approved.

Clients can access daily, monthly, and annual account statements as well as daily trade confirmations through a password protected portion of Interactive Brokers' website, www.interactivebrokers.com. Clients should also expect to receive quarterly account summaries from the qualified custodian by first-class mail. Clients should carefully review the account statements and summaries received from the qualified custodian(s) and compare such official custodial statements to any account reports provided by Grosse Point Capital Management. Any client that does not receive an account statement or

summary from the qualified custodian should call our firm immediately so that we can arrange to have another statement sent by the custodian.

Clients can also access information concerning their account(s) and access (and generally change) the settings for their brokerage account online on the Charles Schwab Institutional website at www.schwabinstitutional.com. The Interactive Brokers website can be reached at www.interactivebrokers.com.

Item 16 Investment Discretion

DISCRETIONARY AUTHORITY

Grosse Point Capital Management manages client securities portfolios on a discretionary basis and as such has discretionary authority to determine the securities to be bought or sold for a client's account and number of securities to be bought or sold for a client's account. Grosse Point Capital Management is granted limited discretionary authority in writing by the client at the outset of the advisory relationship. This limited discretionary authorization gives Grosse Point Capital Management the authority to manage the client's investment assets at our firm's sole discretion and without consulting with the client in advance, subject to the investment objectives, guidelines and restrictions set by the client. This authorization will remain in full force and effect until we receive a written termination notice of the Engagement Agreement from the client.

Grosse Point Capital Management does not have discretionary authority to determine what broker-dealer to use or the number of commissions that are charged by the broker-dealer or custodian.

Item 17 Voting Client Securities

AUTHORITY TO VOTE CLIENT PROXIES

Grosse Point Capital Management does not accept authority from clients with respect to voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios. The qualified custodian holding clients' assets will send all such documents it receives to the client so that the client may take whatever action the client deems appropriate. Grosse Point Capital Management does not offer clients any consulting assistance regarding proxy issues.

Item 18 Financial Information

REQUIRED DISCLOSURES

As previously discussed in this brochure, Grosse Point Capital Management has discretionary authority when providing investment management services if agreed upon in writing with the client. Grosse Point Capital Management does not require clients to prepay more than $500 in fees six months or more in advance.

Grosse Point Capital Management has no financial commitments that would impair our firm's ability to meet our contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.

Item 19 Requirements for State-Registered Advisers

EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

Name: Michael Bloom, CFP®, ChFC®, AEP®, CLU®

Year of Birth: 1960

Education:
Bachelor of Arts in Political Science; 1982
University of Connecticut
Storrs, CT

Master of Business Administration, Marketing; 1986
The Ohio State University
Columbus, OH

Experience:
Managing Member
Grosse Point Capital Management
Evanston, IL
April 2013 – present

Wealth Management Advisor
Northwestern Mutual Investment Services LLC
Chicago, IL
May 2001 – January 2013

Professional Designations:
Certified Financial Planner (CFP)
Chartered Financial Consultant (ChFC®)
Chartered Life Underwriter (CLU®)
Accredited Estate Planner (AEP®)

Certified Financial Planner (CFP®). The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary

certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and several other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements: (1) Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning; (2) Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances; (3) Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and (4) Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks: (1) Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and (2) Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Chartered Life Underwriter® (CLU®). The CLU® designation is one of the oldest and most respected credentials in financial services, dating back to the late 1920's. It represents a thorough understanding of a broad array of personal risk management and life insurance planning issues and stresses ethics, professionalism, and in-depth knowledge in the delivery of financial advice.

CLU® candidates must complete eight college-level courses, five required and three electives. The required courses include Fundamentals of Insurance Planning; Individual Life Insurance; Life Insurance Law; Fundamentals of Estate Planning; and Planning for Business Owners and Professionals. Elective topics cover financial planning, health insurance, income taxation, group benefits, investments, and retirement planning.

Prerequisites include three years of full-time, relevant business experience. Designation holders must adhere to The American College's Code of Ethics, which includes the following professional pledge: "I shall, in light of all conditions surrounding those I serve, which I shall make every conscientious effort to ascertain and understand, render that service which, in the same circumstances, I would apply to myself." The education requirement consists of passing eight closed-book, course-specific, two-hour proctored exams. 30 hours of continuing education are required every two years.

Accredited Estate Planner® (AEP®). The AEP® designation is a graduate-level specialization in estate AEP® (Accredited Estate Planner®) The AEP® designation is a graduate-level specialization in estate planning, obtained in addition to already recognized professional credentials within the various disciplines of estate planning who support the team concept of estate planning. It is awarded to estate planning professionals who meet stringent requirements of experience, knowledge, education, professional reputation, and character. Educational requirements are two graduate-level courses administered by The American College or from another accredited graduate program as part of a master's or doctoral degree unless applicant has 15 or more years' experience as an estate planner.

Candidates must meet all of the following requirements: Must be an attorney (JD), accountant (CPA), insurance professional or financial planner (CLU®, ChFC®, CFP® certificant) or trust officer (CTFA); must be in good standing with their professional organization, not be subject to disciplinary investigation, and provide three professional recommendations. Must be presently and significantly engaged in estate planning activities and have a minimum of five years' experience in estate planning in one or more of the prerequisite professions. AEP® designees must maintain membership in NAEPC. NAEPC's Code of Ethics is intended to align with those of the gateway professional designations required prior to earning the AEP®. View the NAEPC Code at http://www.naepc.org/codeofethics. Examination standards are those used by the accredited academic institution providing the graduate courses and include proctored, closed-book exams. Continuing education requirements are 30 hours every 24 months, including 15 hours in estate planning. Recertification required annually.

Chartered Financial Consultant (ChFC®). The ChFC® designation is offered by The American College. Designation holders are required to serve clients with the highest level of professionalism. The authority to use the ChFC® mark is granted by the Certification Committee of the Board of Trustees of The American College, and that privilege is contingent on adherence to strict ethical guidelines. All ChFC® advisors are required to do the same for clients that they would do for themselves in similar circumstances, the standard of ethical behavior most beneficial for their clients. Each ChFC® has taken 9 or more college-level courses on all aspects of financial planning. The average study time for the program is over 400 hours, and advisors frequently spend years earning this coveted distinction. Each ChFC® must also complete a minimum of 30 hours of continuing education every two years and must meet extensive experience requirements to ensure that you get the professional financial advice you need.

OUTSIDE BUSINESS ACTIVITIES

Please refer to Part 2B, Item 4 (Outside Business Activities) of the Brochure Supplement for more information.

PERFORMANCE-BASED FEES

Grosse Point Capital Management does not charge our clients fees based on a share of capital gains on or capital appreciation of the assets in their accounts.

LEGAL OR DISCIPLINARY EVENTS

Our firm and our management personnel have no disciplinary events to disclose.

ISSUERS OF SECURITIES

Neither Grosse Point Capital Management nor our management persons have any relationships or arrangements with any issuers of securities.

BUSINESS CONTINUITY PLAN

Grosse Point Capital Management maintains a written Business Continuity Plan. Clients may request a copy by writing directly to our firm at michael@grossept.com.

ADDITIONAL COMPENSATION

Mr. Michael Scott Bloom may receive additional compensation in his capacity as an insurance professional for Grosse Point Insurance. Mr. Bloom does not receive any economic benefit from anyone who is not a client for providing advisory services.