



Item 1. Introduction

- A. **NinePointTwo Capital LLC is registered with the Securities and Exchange Commission as an investment advisor and we provide investment advisory services rather than brokerage services.** Investment advisory services and brokerage services and fees differ and it is important for the retail investor to understand the differences. This document gives you a summary of the types of services we provide and how you pay. Please ask us for more information.
- B. Free and simple tools are available to research firms and financial professionals at www.investor.gov/crs which also provides educational materials about broker-dealers, investment advisors, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

Services: We provide fee-based investment advisory services to our clients. We are also a General Partner to a Delaware limited partnership, NPT Neutron Fund I, LP.

Monitoring: We monitor our client accounts on an ongoing basis as a part of our standard separate account services. We will discuss your investment goals, and design with you a strategy to achieve your investment goals.

Investment Authority: We buy/sell investments in your account without asking you in advance, this is called “discretionary authority”.

Investment Offerings: Our investment advice is not limited to a particular type of security. We provide advice with respect to equities, foreign securities, corporate debt securities, commercial paper, municipal securities, US government securities, options in securities and commodities, futures contracts on tangibles and intangibles and interests in partnerships investing in real estate, and oil and gas interests.

Account Minimums: We do not have a minimum client relationship requirement or minimum account size to open or maintain a separately managed account. Limited Partners of NPT Neutron Fund I, LP are subject to a minimum requirement of a \$1,000,000 investment in the Fund.

Additional Information: Our firm was formed as of January 24, 2018, and as of June 29, 2018 registered with the state of California securities regulators. As of March 11, 2021, the firm is registered with the U.S. Securities and Exchange Commission. The principal owners of the firm are Timothy Streufert and Joseph Malhas.

Ask us for our Form ADV Part 2A Brochure for complete details about our services and fees.

Questions you should ask your financial professional.

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

Item 3. Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

Principal Fees and Costs: You will pay an asset-based fee at the end of each quarter for our services, based on the value of the cash and investments in your separately managed advisory account. The annualized management fee will range from 0.50% to 2.00%.

Investors in our NPT Neutron Fund I, LP will pay a management fee as set forth in each Limited Partner’s Partnership Agreement. This fee is paid in advance as of the first day of each fiscal quarter. The more assets there are in your account, the more you will pay in fees, and the firm may therefore have an incentive to encourage you to increase the assets your account. Our fees vary and are negotiable. The amount you pay will depend, for example, on the services you receive and the amount of assets in your account.

Other Fees and Costs: You are responsible for all custodial and securities broker-dealer execution fees charged by the custodian and executing broker-dealer. Our asset-based fee is separate and distinct from the custodian and broker-dealer execution fees. You will pay a transaction fee when we buy and sell an investment for you. You will also pay fees to a broker-dealer or bank that will hold your assets.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. **Refer to our Form ADV Part 2A Brochure, Item 5.A.B.C.D. for more detailed information about our fees.**



Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? What are your legal obligations to me when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

B. Standard of Conduct

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Potential Conflicts: The more assets there are in a retail investor’s separately managed advisory account, the more a retail investor will pay in fees, and the firm may therefore have an incentive to encourage the retail investor to increase the assets in his or her account.

We offer information to prospective and current clients about the NPT Neutron Fund I, Limited Partnership if they meet qualified investor standards. We will discuss with you what the qualified standards are and if you are interested in investing in the Limited Partnership. Our principals, representatives and employees may be or are currently invested in the limited partnership. The receipt of additional compensation by our principals, representatives or employees creates a conflict of interest. If you elect to purchase an interest in the limited partnership, we will disclose all fees you will pay, in advance.

How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

We are paid by the asset-based fee that is charged to your investment account. The more assets you have in your advisory account, including cash, the more you will pay us. We therefore have an incentive to increase the assets in your account in order to increase our fees.

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No. We have no legal or disciplinary history to report. Free and simple search tools are available to retail investors who visit www.investor.gov/CRS to research our firm and financial professionals.

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

Item 5. Additional Information

For additional information about our services or for a copy of this disclosure, please contact: Joseph Malhas, Principal and CCO, Phone: (323) 486-3600

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

