Item 1 Cover Page

Firm Brochure

Part 2A of Form ADV

October 1, 2026



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This brochure provides information about the qualifications and business practices of Beacon Wealth Consultants, Inc. If you have any questions about the contents of this brochure, please contact us at (540) 345-3891. 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.

Additional information about Beacon Wealth Consultants, Inc. is available on the SEC's website at www.adviserinfo.sec.gov

Please note that registration as an investment advisory firm does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. When a material change occurs, the adviser must notify clients and provide a summary of those changes.

The following material change has been made to the Firm's disclosure brochure:

- **Retirement Plan Fee Schedule Update.** The Firm has reduced the advisory fee applicable to the highest asset tier for retirement plans. The updated fee schedule for these plans is provided below and again in Item 5 of this brochure.

Plan AUM	Beacon Wealth Platform Fee	IAR Consultant Fee	Total Beacon Fees
$0 - $500,000	0.30%	1.00%	1.30%
$500,000.01 - $1,000,000	0.30%	0.75%	1.05%
$1,000,000.01 - $2,500,000	0.30%	0.65%	0.95%
$2,500,000.01 - $5,000,000	0.25%	0.50%	0.75%
$5,000,000.01 - $10,000,000	0.20%	0.40%	0.60%
Over $10,000,000	0.15%	Negotiable	Negotiable

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Item 4 Advisory Business

About the Firm

Beacon Wealth Consultants, Inc. (“Beacon Wealth Consultants,” “us” or “we") is an investment advisory firm registered with the U.S. Securities and Exchange Commission. We commenced doing business as an advisory firm in 2010. As a registered investment advisory firm, we are a fiduciary to our clients. This means we have an obligation to put client needs ahead of our own and to act in our client’s best interest, without regard to financial or other interests of ourselves, a financial institution or any other affiliate, related party or other party. Our owners are

Rick Laymon, MBA, CFP®, CKA®, AIF®, CEPA® and Cassandra Chandler Laymon.

Description of Advisory Services

We provide investment advice including comprehensive **Wealth Management Services** that include our proprietary True Wealth Solution™, including investment in our exclusive LightPoint Portfolio Solutions™, custom financial planning and continuous investment oversight and advice. Similar services are also available on a non-discretionary, la carte basis in addition to Estate Administration & Wealth Transfer Consulting, 401(k) Advisory Service and True Wealth Legacy Coaching™. We also offer retirement plan services to plan sponsors.

Beacon Wealth Consultants, Inc. also provides the LightPoint Portfolios investment solutions on a sub-advisory basis and via model portfolios to non-affiliated investment professionals and plan sponsors. For a description of our LightPoint Portfolios, see LightPoint Portfolio Solutions™ below.

Each of these services are described more fully below.

The True Wealth Solution™

The True Wealth Solution™ is our proprietary financial planning process. It begins with The Vision Clarifier™, our discovery process that is designed to identify and understand your unique goals, financial needs and passions. It serves to bring clarity and focus to the entire planning process. The True Wealth Solution™ is designed to coordinate your finances, plot your current course, and help you clearly see where you stand relative to accomplishing established measurable goals. The True Wealth Solution™ then sets out charting a new custom strategic plan, Investment Policy Statement and portfolio design — providing a valuable framework for making wise decisions about time and money.

The True Wealth Solution is available as an a la carte planning service or bundled with our Investment Management Services (discretionary). The investment advisor representative will meet with you periodically, but at least once per year, either in person or virtually, to review plan progress, the performance of investments and make updates to the plan as appropriate.

LightPoint Portfolio Solutions™

The LightPoint Portfolio Solutions™ are fully screened, Biblically Responsible Investment (BRI) portfolios designed to reflect faith and family values while pursuing competitive returns.

- LightPoint™ Mutual Fund/ETF Portfolios – A strategic asset allocation program ($25,000 minimum) that primarily utilizes mutual funds, closed end funds, and/or exchange traded products to implement a variety of investment portfolios with different risk and reward characteristics.
- LightPoint™ Select Equity Portfolios – A strategic asset allocation program ($500,000 recommended minimum) that primarily utilizes strategic asset allocation to achieve broad-market exposure with mild equity-to-fixed income and sector tilts. Securities utilized could include, but are not limited to, common stock, exchange traded products, mutual funds, closed-end funds, preferred stock, and convertible securities to implement a variety of investment portfolios with different risk and reward characteristics.

Annuities

In limited circumstances, where an annuity (fixed, equity-index, or variable) is appropriate per the client's financial plan, approved, commission-free annuities may be utilized as part of plan implementation. A standard advisory fee will apply. See Item 5 below for details.

TIAA Program

TIAA-CREF provides record-keeping and related services to employer-sponsored retirement plans and annuity products. TIAA-CREF allows us to provide asset allocation services to clients at select Institutions. These services are only available to certain legacy clients; we do not offer these services to new clients. We can view general information about TIAA products, view client account information; request forms; change premium allocations; transfer/exchange funds among like accounts within TIAA; and cancel transfer/exchanges of funds among like accounts within TIAA. The asset allocation program utilizes funds that are made available to plan participants by the plan sponsor to implement a variety of investment portfolios with different risk and reward characteristics.

Small Account Program

The Small Account Program is designed for new investors who are growing their investment assets, or larger investors who are creating legacy accounts for their heirs. The Small Account Program is an asset allocation program ($1,000 minimum [$25 for SIMPLE IRAs] and $25,000 maximum) that utilizes screened, Biblically Responsible Investment (BRI) portfolios of mutual funds to implement a variety of investment objectives with different risk and reward characteristics.

Basic Retainer Service

For those who do not meet our minimum account size for the LightPoint Portfolios, we offer a basic retainer service that provides client a one-page financial plan and on-going advice for overall wealth management and investments held in unmanaged accounts or held away from the adviser. This is a completely customizable service to meet a broad range of client needs.

401(k) Advisory Service

An investment adviser representative will perform a quarterly review and provide recommendations on investment options for the client's 401(k), other employee sponsored retirement program or investment accounts that the adviser does not have the ability to place trades on behalf of the client.

Estate Planning Services

We offer Estate Planning services in conjunction with Vanilla, an unaffiliated estate-planning software company. Vanilla provides software and tools designed to develop estate plans for clients. Depending on the needs of the client, Estate Plans may include a Trust, Power of Attorney, Medical Power of Attorney or Advance Health Care Directive, or Will. Additional documents may be produced by Vanilla. We will guide the client through the necessary questions and responses to assist in the creation of the documents and will coordinate with local attorneys in certain circumstances.

Estate Administration and Wealth Transfer Consulting

Estate Administration – We are available to assist executors and trustees with the compiling and valuation of an estate's financial assets; working with custodians of those assets to transfer registration to the estate beneficiaries. This could include Collaboration with estate attorney and CPA as necessary.

Wealth Transfer Consulting – We are available to evaluate the various planning strategies and mechanisms available to effectively transfer wealth to others while still living (children, charitable organizations, etc.) to meet client's planning objectives, including the tax and financial planning implications of each. Collaboration with the attorney and CPA as needed for implementation.

True Wealth Legacy Coaching™

The True Wealth Legacy Coaching service helps guide you in assessing your current financial situation and allocating resources towards the fulfillment of your family legacy, charitable gift planning, estate, business and wealth transfer and non-financial goals. It could include conducting family retreats, the drafting of a family mission statement and ethical wills, training and mentoring the next generation of stewards, estate design, and establishing various charitable giving vehicles as appropriate. We will provide ongoing monitoring, plan progress and implementation counsel related to achieving your long-term goals and objectives in these areas.

LightPoint Kingdom(k) ®, LightPoint Kingdom(b) ® and other Retirement Plan Services

Beacon Wealth Consultants, Inc. provides consulting and advisory services in the form of ERISA Section 3(38) fiduciary services for 401(k) qualified plans, certain defined benefit plans, non-ERISA 403(b) plans and ERISA-covered 403(b)7 plans to employers and plan sponsors for the benefit of its retirement plan. There is no plan size minimum. Services eligible to be selected in the Retirement Plan Consulting & Advisory Agreement include:

- Assisting the employer or plan sponsor in the implementation of the Plan's Investment Policy Statement (IPS) or assist in creating one.
- Plan investment due diligence, selection, monitoring, and replacement.
- The design and maintenance of risk-based model portfolios which are screened according to the criteria outlined in the Plan's IPS. The asset allocation program primarily utilizes mutual funds and exchange traded products to implement a variety of investment portfolios with different risk and reward characteristics.
- Participant education and enrollment support.

Details of the specific obligations of Beacon Wealth Consultants, Inc. is provided in the Retirement Plan Consulting & Advisory Agreement and Non-ERISA Retirement Plan Consulting & Advisory Agreement between the employer or plan sponsor and Beacon Wealth Consultants, Inc. Beacon Wealth Consultants, Inc. does not provide record keeping, custodial, or Third-Party Administrator (TPA) services for the employer or plan sponsor. The employer or plan sponsor will choose providers for these services.

With respect to plans that are not participant–directed (e.g., defined benefit plans such as cash balance plans and certain defined contribution plans such as money purchase and profit-sharing plans) and that utilize Beacon Wealth's discretionary investment management services, Beacon Wealth Consultants exercises full discretion with respect to delegated assets as to the selection of fund managers and the allocation of plan assets among such managers. Beacon Wealth Consultants is responsible for monitoring the performance of the managers.

LightPoint Kingdom(k)® and LightPoint Kingdom(b) ® Retirement Plan Distribution

Beacon Wealth Consultants, Inc. provides consulting and advisory services to companies and organizations ("Plan Sponsors") eligible under current law to sponsor 401(k) retirement plans and churches and organizations eligible to sponsor 403(b) retirement plans in our LightPoint™ Portfolio Solutions model portfolios. These services are offered through an alliance with Epic Retirement Plan Services. In these arrangements, Beacon Wealth Consultants, Inc. establishes an agreement with the Plan Sponsor. The Plan Sponsor could, at its own discretion, have a separate agreement with a financial advisor that is not affiliated with Beacon Wealth Consultants. If this is the case, Beacon Wealth Consultants actions will be guided by the Plan Sponsor's investment objectives, as reported to Beacon Wealth Consultants by the client. Under these circumstances, Beacon Wealth Consultants, Inc. will coordinate with the Plan Sponsor's financial advisor but will always act in the best interest of the Plan Sponsor.

Rollover Recommendations

When clients change employment or retire, Beacon Wealth Consultants may recommend that clients roll over assets from an employer-sponsored retirement plan to an IRA managed by the firm. Such recommendations create a conflict of interest because Beacon Wealth Consultants receives advisory fees on assets managed in client accounts.

Prior to recommending a rollover, the firm evaluates factors such as:
• fees and expenses of the existing plan
• available investment options
• services provided by the plan
• the client's financial circumstances and objectives

Clients are under no obligation to roll over retirement plan assets to accounts managed by Beacon Wealth Consultants.

LightPoint™ Portfolio Solutions Distribution - Sub-Advisory Services and Model Delivery Program

LightPoint™ Portfolio Solutions Sub-Advisory Services

Beacon Wealth Consultants provides consulting and advisory services to other registered investment advisers and investment professionals (the "primary advisers") as a sub-advisor, allowing their respective clients to invest in our LightPoint™ Portfolio Solutions portfolios. In these arrangements, we establish an agreement with the advisor or advisory firm, and not directly with the investor/client. We will implement and manage an investment strategy in the client's account; however, we do not serve as the primary adviser to the client. The primary adviser will retain direct contact with the client and will manage the client relationship. We will have exclusive investment discretion as to which securities shall be purchased or sold in the sub-advised client's account in a manner consistent with the client's selected product, investment objectives, policies and restrictions (if any) and the capabilities of the broker-dealer. In order to determine whether the strategy is suitable for a client, the primary adviser and the client are responsible for ascertaining the goals and objectives of the portfolio in question. In addition, we will obtain initial documentation of the client's risk parameters and investment objectives. However, it is the responsibility of the primary adviser and/or the client to promptly notify us of any changes in financial condition of the client that would necessitate a change in the client's investment objective.

LightPoint™ Portfolio Solutions Model Delivery

Beacon Wealth Consultants also participates in Model Delivery programs where we are retained by the Program Sponsor to provide a model portfolio and update the model portfolio as we make changes to our own LightPoint Portfolio Solutions portfolios. In Model Delivery programs, we do not exercise investment discretion or trade the account. Rather, the Program Sponsor maintains investment discretion for the account and may or may not elect to execute any or all of the purchase or sale transactions that we recommend. Furthermore, in Model Delivery arrangements, the Program Sponsor is responsible for determining the timing of transactions, execution venue, and other decisions relating to the trade execution. Additionally, Program Sponsors may accept individualized client investment guidelines and restrictions on the management of the account. As a result, there is expected to be material performance differences between account performance in Model Delivery programs and our LightPoint Portfolio Solutions portfolios.

As a model portfolio adviser in a managed account platform, we provide recommendations and investment advice regarding model portfolios which is delivered and administered by a platform to other investment professionals that have either "wrap" fee or non-wrap managed account programs. We receive fees from the providers of such platforms based on the amount of assets managed using our model portfolios. A wrap fee program is considered any arrangement under which clients receive investment advisory and securities brokerage services for a specified fee or fees not based upon transactions in their accounts.

Assets Under Management

As of December 31, 2025:
• Discretionary Assets Under Management: **$278,261,194**
• Assets Under Advisement: **$4,248,781**

Item 5 Fees and Compensation

Wealth Management Services

Fees for The True Wealth Solution™ financial planning service are included in our comprehensive Wealth Management Services (see below). Alternatively, it is offered on an a la carte basis as a One-time Comprehensive Financial Plan charged at a rate equal to 1% of net worth or $1500, whichever is higher, for planning-only engagements. Reviews and updates to these plans will be billed at $300 per hour. Financial plans are delivered to the client within 120 days unless otherwise discussed with the client. If arrangements for plan delivery to the client are adjusted, fees will be scheduled so that we do not receive $1,200 or more for services not provided within a six (6) month period.

Wealth Management Services

The annual fee will be based on a linear fee schedule with accounts aggregated as a household as directed in Exhibit A of the Investment Advisory Agreement. Please review the fee schedule within your advisory agreement. Our standard fee schedule is:

Household Portfolio Value(breakpoint):	Advisory & Management Fee
$0 - $100,000	2.00%
$100,000.01 - $250,000	1.50%
$250,000.01 - $500,000	1.40%
$500,000.01 - $1,000,000	1.25%
$1,000,000.01 - $2,000,000	1.00%
$2,000,000.01 - $5,000,000	0.85%
$5,000,000.01 - $10,000,000	0.75%
Over $10,000,000	0.65%

As an example, a client with a household value of $251,000 would pay 1.40% annual advisory and management fees. The fee will be charged quarterly in advance based on the managed value of each account on the last day of the prior billing period. Fees are prorated for contributions and withdrawals of $1,000 or more made during a billing quarter. If management begins after the start of a quarter, fees will be prorated accordingly. With client authorization, unless other arrangements are made, fees are normally debited directly from client account(s).

Adviser has established a minimum initial household portfolio value of $50,000. Exceptions to this minimum (further explained in Item 7) will be based on the client's desire for our bundled services and their understanding of the fees. These exceptions are at the sole discretion of the adviser. Unless stated otherwise, if you also have an account with Beacon Wealth Consultants that is custodied at custodian other than Charles Schwab & Co., Inc. (e.g., an account at Lincoln Financial, Allianz Life Insurance Company of North America or Security Benefit Life Insurance Company), the account will not be included in your household portfolio value used to determine your fee breakpoint. Termination is upon written notice.

Accounts closed mid quarter will be reimbursed the pro rata share of the unused advisory fees for the final quarter. This will be paid directly into the account. You could terminate our services within 5 business days of signing our investment advisory agreement and receive a full refund of any pre-paid advisory fees. Termination is upon written notice. Similar services could be available for lower fees. Please discuss your circumstances with your adviser as not all accounts are suitable as managed accounts.

Accounts Held with Insurance Companies or Annuity Providers

In certain circumstances, client assets may be held in annuity or insurance products issued by insurance companies, including but not limited to Teachers Insurance & Annuity Association–College Retirement Equities Fund ("TIAA"), Nationwide/Jefferson National, Lincoln Financial, Allianz Life Insurance Company of North America, and Security Benefit Life Insurance Company. These accounts may be included as part of a client's advisory relationship with Beacon Wealth Consultants, subject to the following fee arrangements. Clients should be aware that insurance products may include additional costs and expenses that are separate from and in addition to the advisory fees charged by Beacon Wealth Consultants.

TIAA Accounts
Accounts held through the TIAA program are included when calculating the client's household portfolio value for purposes of determining advisory fee breakpoints. However, advisory fees charged on these accounts will be subject to the lower of:
• the firm's standard advisory fee schedule, or
• the fee cap established by the client's TIAA institution.

Advisory fees are calculated based on the total accumulation value of the contract(s). Actual fee deductions may only be taken from funds within the contract that permit such deductions under the terms of the annuity contract.
Fees are generally billed quarterly in advance based on the account value on the last day of the prior billing period. Fees are deducted directly from the account by TIAA and remitted to Beacon Wealth Consultants.

Nationwide/Jefferson National Accounts (Jefferson National is now part of Nationwide), and Mass Mutual
Accounts held with Nationwide/Jefferson National, or Mass Mutual are subject to:

- the insurance company's standard product fees and expenses, including but not limited to mortality and expense charges, administrative fees, underlying investment expenses, and any applicable rider costs, as disclosed in the annuity contract or related documents; and
- an advisory fee of 1.00% annually payable to Beacon Wealth Consultants.

These advisory fees are billed quarterly in advance based on the account value as of the last day of the prior billing period. Where permitted by the contract, the insurance company deducts the advisory fee directly from the account and remits it to Beacon Wealth Consultants, pursuant to client authorization.

Lincoln Financial, Allianz, Jackson National, Midland, and Security Benefit Accounts
Accounts held with Lincoln Financial, Allianz, Jackson National, Midland, Mass Mutual, or Security Benefit Life Insurance Company are subject to:

- the insurance company's standard product fees and expenses, including mortality and expense charges, administrative fees, underlying investment expenses, and any applicable rider costs; and
- an advisory fee of 0.50% annually payable to Beacon Wealth Consultants.

These advisory fees are billed quarterly in advance based on the account value as of the last day of the prior billing period. Where permitted by the applicable contract, the issuing insurance company deducts the advisory fee from the account and remits the fee to Beacon Wealth Consultants, pursuant to client authorization.

Additional Considerations
Clients should understand that the fees and expenses associated with annuity and insurance products are separate from and in addition to the advisory fees charged by Beacon Wealth Consultants. As a result, the total cost of investing through these products may be higher than investing in similar strategies outside of an insurance or annuity structure.
Beacon Wealth Consultants does not receive any additional compensation from the insurance companies referenced above in connection with advisory services provided on these accounts.

Accounts held with these insurance companies are included when calculating household portfolio value for purposes of determining advisory fee breakpoints.

Minimum Account Requirements
Beacon Wealth Consultants generally requires a minimum initial household portfolio value of $50,000 for wealth management services. Exceptions to this minimum may be granted at the firm's discretion based on factors including anticipated future assets, the scope of services requested, or the client relationship.

Termination and Refunds
Clients may terminate the advisory relationship at any time upon written notice.
If an account is terminated during a billing period, the client will receive a pro rata refund of any prepaid advisory fees for the remaining portion of the billing period.

Clients may also terminate the advisory agreement within five business days of execution and receive a full refund of any prepaid advisory fees.

Basic Retainer Service

The fee for this service is $300 per quarter. These fees are charged quarterly in advance. You will be invoiced quarterly in advance and could stop service at any time. If you decide to stop services after you pay for the quarter, but before services are delivered, you will be refunded based on the percentage of agreed upon services that have not been completed. Termination is upon written notice.

401(k) Advisory Services

The annual fee as a percentage of assets under advisement is 1.0% or a minimum of $1,000 annually, whichever is greater. You will be invoiced quarterly in advance and could stop service at any time. If you decide to stop management after you pay for the quarter, before services are delivered, you will be refunded. Termination is upon written notice.

Estate Planning Services

The fees for our Estate Planning Services are listed below. Fees are payable at the time the services are completed.

Standard Trust-Based Estate Plan: $1,500 (married or single)
Includes Revocable Trust, Certification of Trust, General Transfer, Power of Attorney – Finances, Advance Health Care Directives/Power of Attorney for Health Care, HIPAA Release, Pour Over Wills and Property Agreement (For Community Property States Only)

***If a client is married but wants/needs separate trusts, we would charge $1,250 for the first trust and a minimum of $500 for the second. Price can vary based on double the deeds, business assignments along with processing and review time.*

Advance Trust-Based Estate Plan: $5000 - $25,000 (married or single)
In addition to the above, may include certain Irrevocable Trust arrangements such as but not limited to: ILIT, CRUT, CRAT, CLT, IDGT, QPRT, SLAT, etc.

Will-Based Estate Plan: $750 (single) and $1,000 (married)
Includes Will, Power of Attorney – Finances, and Advance Health Care Directives/Power of Attorney for Health Care

Essential Documents Only: $100 (single) or $200 (married)
Includes Power of Attorney and Advance Health Care Directives/Power of Attorney for Health Care, HIPAA Release.

Deed Preparation
Fees vary based on the state requirements and recording cost.

Estate Plan Amendments or Restatements: Fees vary based on complexity

Business Assignments: $100

Estate Administration and Wealth Transfer Consulting

We offer estate administration and wealth transfer consulting for an hourly rate of $250 per hour. Services are invoiced in arrears as services are provided. Termination is upon written notice.

True Wealth Legacy Coaching™

The fee for True Wealth Legacy Coaching is a fixed fee, and ranges between $3,500 and $35,000 annually depending upon the scope of services requested and the size and complexity of the estate. You will be invoiced quarterly in advance and could stop service at any time. If you decide to stop Coaching after you pay for the quarter, but before services are delivered, you will be refunded based on the percentage of agreed upon services that have been completed. Termination is upon written notice.

Fees for Retirement Plan Services

Retirement Plans through Epic Retirement Plan Services (Epic RPS) are billed quarterly in advance based on the fee schedule below:

Plan AUM	Beacon Wealth Platform Fee	IAR Consultant Fee	Total Beacon Fees
*$0 - $500,000	0.30%	1.00%	1.30%
$500,000.01 - $1,000,000	0.30%	0.75%	1.05%
$1,000,000.01 - $2,500,000	0.30%	0.65%	0.95%
$2,500,000.01 - $5,000,000	0.25%	0.50%	0.75%
$5,000,000.01 - $10,000,000	0.20%	0.40%	0.60%
Over $10,000,000	0.15%	Negotiable	Negotiable

*All plans have a minimum annual fee of $800 plus 1% Advisor Fee.

No increase in the Fees shall be effective without prior written notification to the Plan Sponsor.

Epic RPS administrative and recordkeeping fees and custodial fees are disclosed separately on the EPIC Plan fee disclosure within the EPIC plan document. Beacon Wealth Consultants' Fees are disclosed on our Retirement Plan Investment Consulting and Advisory Agreement. Plan AUM is based on the fair market value of the account assets on the last day of the previous quarter as valued by the custodian. Mutual fund and exchange traded funds incur management fees and other operating fees and expenses which are in addition to the fees paid to Beacon Wealth Consultants.

The fee for the initial quarter or for any partial quarter shall be calculated on a pro-rata basis for the period. If the Agreement is terminated prior to the end of a quarter, Beacon Wealth Consultants shall reimburse the Plan Sponsor or the Plan, as the case may be, for the amount of any unearned fees, as determined by the Agreement, for that quarter. Termination is upon written notice.

Fees could be deducted directly from the Plan account by Epic RPS. You could authorize the Plan's recordkeeper (or other custodian of the Plan's assets) to remit the fees directly to Beacon Wealth Consultants, Inc. from Plan assets in accordance with the agreement with the recordkeeper or custodian, as the case may be. Fees could also be paid directly from the Plan sponsor. Notwithstanding the Plan's obligation to pay fees, the Plan Sponsor could elect within its sole discretion to pay any or all fees to Beacon Wealth Consultants in lieu of payment by the Plan; provided that any fees remaining unpaid after thirty (30) days from the date of invoice shall be due and payable immediately by the Plan.

The IAR consultant will be compensated for their advisory services for maintaining ongoing services to the client. The fee could be paid from plan assets and/or paid by the Plan Sponsor.

We do not provide record keeping, custodian or Third-Party Administrator (TPA) services for the employer or plan sponsor. Custodial services provided by Schwab. TPA services provided by Epic RPS.

Fees for LightPoint Kingdom(k)® and LightPoint Kingdom(b)® Fiduciary Services

Fees for the distribution of the LightPoint Kingdom(k)™ and LightPoint Kingdom(b)™ Retirement Plans through sub-advisory agreements with outside advisors are billed quarterly in advance based on the fee schedule below.

Plan AUM	Sub-Advisory Fee
*$0 - $500,000	0.30%
$500,000.01 - $1,000,000	0.30%
$1,000,000.01 - $2,500,000	0.30%
$2,500,000.01 - $5,000,000	0.25%
$5,000,000.01 - $10,000,000	0.20%
Over $10,000,000	0.15%

*All plans have a minimum platform fee of $800 per year. Beacon Wealth's Fees for plans in excess of $10,000,000 are negotiable.

In certain instances, we may offer these services through a Plan Recordkeeper. In these situations, our fee schedule differs. The Plan is billed on behalf of the Investment Advisor by the Plan Recordkeeper. Billing is calculated quarterly in arrears based on the average daily balance, and fee schedule below:

Plan AUM	Beacon Wealth Platform Fee	IAR Consultant Fee	Total Beacon Fees
*$0 - $500k	0.25%	1.00%	1.25%
$500,000.01 - $1,000,000	0.25%	0.75%	1.00%
$1,000,000.01 - $2,500,000	0.25%	0.65%	0.90%
$2,500,000.01 - $5,000,000	0.25%	0.50%	0.75%
$5,000,000.01 - $10,000,000	0.25%	0.40%	0.65%
Over $10,000,000	0.15%	Negotiable	Negotiable

No increase in the Fees shall be effective without prior written notification to Client.

The fee for the initial quarter or for any partial quarter shall be calculated on a pro-rata basis for the period. Termination is upon written notice. Third party administrative (TPA) and recordkeeping fees and custodial fees are disclosed separately on the separate TPA and custodial fee disclosure documents. Plan AUM is based on the daily fair market value of the account assets as valued by the custodian. Mutual fund and exchange traded funds incur management fees and other operating fees and expenses which are in addition to the fees paid by the Client to Investment Advisor.

IAR will be compensated for their services by maintaining ongoing services to Client. The fee may be paid from Plan assets and/or paid by the Employer/Client.

Beacon Wealth Consultants, Inc. does not provide record keeping, custodian or Third-Party Administrator (TPA) services for the employer or plan sponsor.

LightPoint™ Portfolio Solutions Distribution

Sub-Advisory Services Fees

Our sub-advisory fees for implementation of the LightPoint Portfolio Solutions™ are billed quarterly in advance based on the fee schedule below. Fees are prorated for contributions and withdrawals of at least $1,000 made during a billing quarter. If management begins after the start of a quarter, fees will be prorated accordingly. These fees are tiered based on client total household investment. You should see the primary adviser's Form ADV Part 2A for more information regarding its fees, as fees will vary by adviser. Beacon Wealth Consultants will calculate the sub-advisory fee and the primary advisor's management fee, which will be combined and deducted from the client's account. Beacon Wealth Consultants is responsible for paying over the primary advisor's management on behalf of the client.

An account minimum of $50,000 applies to all accounts which we sub-advise.

Household AUM	Sub-Advisory MF/ETF Fee	Sub-Advisory Select Equity Fee
First $100,000	0.45%	0.55%
Next $150,000	0.40%	0.50%
Next $250,000	0.35%	0.45%
Next $500,000	0.30%	0.40%
Next $1,000,000	0.25%	0.35%
Amounts Over $2,000,000	0.15%	0.25%

Model Delivery Program Fees

We receive a percentage fee from the providers of such platforms based on the amount of assets managed using our model portfolios. Fees are assessed based on the value of the assets at the close of the prior month and the amount of compensation is negotiated with the Program Sponsor of the client's account and typically range up to 0.35%. Our fees are generally payable quarterly in arrears unless negotiated differently with the Program Sponsor. The contracts that clients enter into with the Program Sponsors contain the total investment advisory fee, termination provisions, and refund provisions. You should review the Program Sponsor's contract and the applicable Wrap Fee Program Brochure prior to opening an account with a Program Sponsor.

Other information concerning services and fees

The advisory fees outlined in this disclosure represent the fees for our services only. Our fees are not based upon a share of capital gains or capital appreciation of the funds of any portion of the funds of an advisory contract (no performance-based fees). Custodial fees and transaction costs will typically be charged separately by the custodian of your assets (unless in a wrap program) and are disclosed on the account opening paperwork from your custodian.

The investment advisory fee does not cover any fees charged by the SEC or U.S. or foreign stock exchanges based on the sale of any security, any special account fees imposed by the custodian (such as IRA maintenance fees), wire transfer fees, transfer of assets upon termination of the account or any internal management or operating fees (including potential redemption fees) or expenses imposed or incurred by a mutual fund, closed end fund, or exchange traded product in which the client's account could be invested or any special requests by the Client.

Fees could be discounted or negotiated at Beacon Wealth Consultants' sole discretion. Certain existing clients could be billed under fee schedules that are not described in this Brochure. The applicable fee schedule is set forth in your investment advisory agreement with us and could be changed by us on 30 days' prior notice. We could modify our fee schedule at any time, either generally for a class of accounts or on a case-by-case basis.

As accommodation to a client, we could permit a client to deposit cash or other securities in their account or, alternatively, at the client's discretion, in a separate account established with the custodian, for which we do not

provide asset allocation or portfolio management services. We do not charge an advisory fee on such unmanaged Assets.

Item 6 Performance-Based Fees and Side-by-Side Management

We do not accept performance-based fees nor do we engage in side-by-side management.

Item 7 Types of Clients

We generally provide investment advice to individuals, trusts, estates, charitable institutions, business entities, pension and profit-sharing plans. All programs (other than LightPoint Kingdom(k)™) are available to these different types of investors, subject to certain minimum investment amounts as described in Item 5 - Fees and Compensation.

Minimum Account Size

With some exceptions, the minimum portfolio value eligible for Comprehensive Wealth Management services is $50,000. Beacon Wealth Consultants, in its sole discretion, has the discretion to accept clients with smaller portfolios based upon certain criteria including anticipated future earning capacity, anticipated future additional assets, the dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention and pro bono activities. Households that drop below the minimum household value are subject to termination at the adviser's discretion.

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

In addition to the information below, see the response to Item 4 - Advisory Business for the methods of analysis and investment strategies in each of the services offered by Beacon Wealth. Investing in securities involves risk of loss that clients should be prepared to bear.

Investment Committee

We utilize an Investment Committee ("Committee") to govern the investment advisory process. The Committee is currently comprised of Hillary Sunderland, CFA®, CKA® (Chief Investment Officer), Rick Laymon, MBA, CFP®, CKA®, AIF®, CEPA® (Chief Executive Officer), Cassandra Laymon (President), Kimberly Jenkins, CFP®, CIMA®, CKA® (Portfolio Manager), and Colin Craig, MBA, CSRIC® (Portfolio Analyst). Members of the Committee conduct, review and analyze research, participate in conference calls, industry conferences, and meetings with fund and investment portfolio managers.

The Committee meets regularly to determine forward-looking portfolio positioning, to determine key investment themes, to construct asset allocation models, and to select securities and/or managers for inclusion in the models. In following its asset allocation process, Beacon Wealth Consultants, Inc. strives to achieve the client's return objectives given the client's risk tolerance based on the Committee's views of the macro economy, investment themes, and fundamental and technical analysis. The Committee uses the following sources of information for analysis and recommendations:

- Research prepared by third parties
- Proprietary investment research
- Corporate ratings services
- Fund prospectuses
- Morningstar® reports
- Company filings

It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable.

Investment Options

Beacon Wealth Consultants, Inc. uses a risk tolerance questionnaire and assessment methodology to assist in developing a recommendation or suggested investment strategy for each client.

In the LightPoint Kingdom(k)® and LightPoint Kingdom(b) ® programs, Beacon Wealth Consultants, Inc. provides a risk tolerance questionnaire which the Plan sponsor could make available to Plan participants to assist them in selecting an investment strategy. Beacon Wealth Consultants, Inc. does not provide a recommendation to Plan participants.

Rebalancing of each strategy occurs at the discretion of the Chief Investment Officer and is based upon several factors including but not limited to the general dynamics of the equity markets, the levels of cash within the strategy, tax consideration for underlying clients and the overall cost of rebalancing.

Model Objective	**Description**
Conservative	Seeks to protect from losses stemming from both market risk and inflation risk. The portfolio invests primarily in fixed-income securities and has modest equity exposure. The investment managers selected for inclusion in the model shall be screened **on a best-efforts basis** to exclude ownership of companies that are engaged in business practices and/or products and services that run counter to biblical principles.
Moderately Conservative	Seeks moderate capital appreciation and some income while withstanding moderate fluctuations in market value. The portfolio is tilted toward fixed income securities and away from equities. The investment managers selected for inclusion in the model shall be screened **on a best-efforts basis** to exclude ownership of companies that are engaged in business practices and/or products and services that run counter to biblical principles.
Balanced	Seeks long-term capital appreciation with moderate volatility. The focus is on providing a balanced and varied exposure by investing in both equity and fixed-income securities. The investment managers selected for inclusion in the model shall be screened **on a best-efforts basis** to exclude ownership of companies that are engaged in business practices and/or products and services that run counter to biblical principles.
Moderately Aggressive	Seeks aggressive growth. The portfolio invests primarily in domestic and foreign equities and has modest exposure to fixed income securities. The portfolio could exhibit wide fluctuations in market values, especially over the short term. The investment managers selected for inclusion in the model shall be screened **on a best-efforts basis** to exclude ownership of companies that are engaged in business practices and/or products and services that run counter to biblical principles.
Aggressive	Seeks very aggressive growth. The portfolio invests primarily in domestic and foreign equities and could exhibit wide fluctuations in market values, especially over the short-term. The investment managers selected for inclusion in the model shall be screened **on a best-efforts basis** to exclude ownership of companies that are engaged in business practices and/or products and services that run counter to biblical principles.

Due Diligence

The Committee oversees the portfolio manager due diligence, selection, and monitoring across all Beacon Wealth Consultants' strategies. The Committee reviews manager performance, addresses potential concerns, and collaborates on new manager searches. New investment strategies, including but not limited to, mutual funds, closed end funds, and exchange traded products are evaluated and selected based on several factors such as organization of the firm, personnel, investment style, investment process and philosophy, liquidity, and overall portfolio fit.

Through a diligent screening process, the investment managers and underlying investments selected for inclusion in the portfolio shall be screened **on a best-efforts basis** to exclude ownership of companies that are engaged in business practices and/or products and services that run counter to biblical principles. Specifically, companies involved in the abortion and pornography industries; companies with human rights violations; and companies that exploit human addiction: alcohol, gambling, tobacco (primary business activities). Additionally, we seek to tilt our portfolios toward companies (and mutual funds/ETFs) that, in our view, manage the risks and opportunities of material, non-financial factors better than industry peers, which we define as those companies who live out the Golden Rule in their business practices; demonstrate strong servant leadership; create compelling value through the products and services they offer; demonstrate strong corporate governance; and care for creation through environmental stewardship.

For asset classes where there is no investment manager/vehicle that meets the screening standards set forth above, investment managers/vehicles shall be selected for inclusion in the portfolios on a best-efforts basis.

While Beacon Wealth Consultants, Inc. seeks to avoid exposure to investment vehicles and securities which run counter to biblical principles, Beacon has no direct control over securities purchased or sold by fund managers, and, as such, makes no guarantee that ownership of securities which violate the screening criteria set forth above will be avoided.

The Committee makes determinations with respect to any new investment strategies using their professional judgment and experience while taking these factors into consideration.

As a result of the screening process, investment managers/vehicles utilized in the portfolios are selected from a more limited menu of investment managers/vehicles than non-screened allocations. As a result, risk characteristics and returns of portfolios could vary from non-screened allocations.

Risk of Loss

Our methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. Investing involves risks that you should be prepared to bear. You could lose some or all of your money.

- Loss of Capital: All of Beacon Wealth Consultants' strategies are subject to general market risk. Any investment in the securities market is subject to risk of loss of capital. The value of the portfolio will fluctuate based upon changes in the value of underlying securities. Investments are not insured by the Federal Deposit Insurance Corporation.
- Faith-Based Investment Strategy Risk. Faith-Based investment strategies limit the types and number of investment opportunities available, as a result, the allocations among asset classes may vary from other model portfolios and strategies that do not have a Faith-Based focus. In addition, Faith-Based strategies may underperform other strategies that do not have a Faith-Based focus. Further, Faith-Based investment strategies may result in the manager allocating to underlying funds that hold securities or industry sectors that underperform the market as a whole or underperform other strategies screened for, or that do not include, securities that conflict with the Faith-Based focus of the strategies. Further, if the strategies include underlying funds that liquidate securities for violations of one or more screening criteria, such liquidation could negatively impact the performance of the underlying fund and the strategies.

- Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, we may invest a portion of your portfolio in mutual funds and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.
- Equity Market Risks. We may invest portions of your assets directly into equity investments, i.e., stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.
- Fixed Income Risks. We may invest portions of your assets into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).
- Foreign Securities Risks. We may invest portions of your assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.
- Technology and Cyber Security Risks. We depend heavily on our, and the certainty of our service providers', telecommunication, information technology and other operational systems (e.g., brokers, custodians, transfer agents and other parties to which we outsource certain services or business operations). These systems may fail to operate properly or become disabled as a result of events or circumstances wholly or partly beyond our control. Despite our best efforts to implement security measures, our information technology and other systems, and those of others, could be subject to physical or electronic break-ins, unauthorized tampering or other security breaches, resulting in a failure to maintain the security, availability, integrity and confidentiality of data assets. Technology failures or cyber security breaches, whether deliberate or unintentional, including those arising from use of third-party service providers, as well as failures or breaches suffered by the issuers of securities in which our strategy invests, could delay or disrupt our ability to do business and service our clients, harm our reputation, result in a violation of applicable privacy and other laws, require additional compliance costs, subject us to regulatory inquiries or proceedings and other claims, lead to a loss of clients and revenues or financial loss to our clients or otherwise adversely affect our business, our clients and/or investors.
- Execution Delay Risk: In the LightPoint ™ Kingdom(k) and Kingdom(b) Programs, Beacon Wealth Consultants provides instructions regarding underlying managers and securities included in the asset allocation models and the weightings thereof. Changes to these models result in the purchase and sale of managers and securities for client accounts. However, the program sponsor is responsible for implementing sales and

purchases, and there could be a delay in the execution of Beacon Wealth Consultants' instructions. Any such delay could be significant and could adversely affect the investment performance of the account.

- In certain circumstances, the Firm may utilize automated or algorithm-based trading tools provided by the Firm's custodian or executing broker to assist with the execution of trades. These tools rely on predefined execution parameters and market data inputs and may introduce risks including execution delays, technological errors, or adverse price movement during the execution period.

The level of exposure to any of the foregoing risks will depend on the extent to which Beacon Wealth Consultants or any fund manager invests in specific securities or uses specific investment strategies that pose such risks.

Item 9 Disciplinary Information

Neither the Firm nor any of our management persons have been involved in any events that are material to a client's or prospective client's evaluation of the Firm or the integrity of its management.

Item 10 Other Financial Industry Activities and Affiliations

In addition, some advisory representatives of Beacon Wealth Consultants are licensed as insurance agents with various insurance companies and/or recommend the purchase of insurance related products. However, as of November 2017, our Advisory Representatives are not permitted to sell any commission-based insurance products. Advisory Representatives of Beacon Wealth Consultants could only facilitate the analysis of, curating and placing of fee-only insurance contracts and could receive an advisory fee for doing so. Clients are under no obligation to act upon any recommendations of the associated persons or effect any transactions through the associated persons if they decide to follow the recommendations.

We contract with Investment Research Partners, an unaffiliated registered investment advisor, to provide investment recommendations to us for a portion of our Select Equity Portfolios. Please see Item 8 for more information about the construction of our portfolios. When we allocate a portion of a client's assets to a Select Equity portfolio, we pay Investment Research Partners a portion of the client's advisory fee. When we do not allocate a portion of a client's assets to the Select Equity Portfolios, we will retain a greater percentage of the collected advisory fee, thus benefiting us financially. This creates a conflict of interest as your financial advisor could direct accounts more suitable as a Select Equity account to a mutual fund/ETF account. In all cases, we have a financial incentive to manage your assets, which is a conflict of interest. We mitigate this conflict by providing quality service, determining your suitability, and making our best fiduciary recommendations to you solely in light of your investment needs. There is no difference in the amount of money a client pays for our advice when we allocate the client's assets to a Select Equity portfolio or when we allocate their assets to our other strategies, only a difference in what we retain.

We offer retirement plan services, including recommending plan investment options, providing guidance to plan trustees, and offering participant education. These services are offered through an alliance with Epic RPS, Inc. Beacon Wealth Consultants is paid for these services, which creates a conflict of interests and an incentive to recommend the program. Similar services could be available for a lower price. Clients are under no obligation to invest.

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

Associated persons could buy or sell for their own accounts the same securities recommended to you. They could do so at the same time as they, or a related person, buy or sell the same securities for their own account. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to you. We request information about our associate's transactions and monitor them for any wrongdoing.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons could also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

We have adopted a Code of Ethics to instruct personnel in their ethical obligations and to provide rules for their personal securities transactions. The Firm and our personnel owe a duty of loyalty, fairness and good faith to their clients, and the obligation to adhere not only to the specific provisions of the code but also to the general principles that guide the Code. The Code covers a range of topics including general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. We will provide a copy of the Code to any client or prospective Client upon request.

Item 12 Brokerage Practices

To the extent applicable to the transactions to be affected, our general policies relative to the execution of client securities brokerage transactions are as follows:

Beacon Wealth Consultants does not maintain custody of your assets that we manage/on which we advise. Your assets must be maintained in an account at a "qualified custodian," generally a broker dealer. We recommend that clients establish brokerage accounts with Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, as the qualified custodian to maintain custody of clients' assets.

The firm recommends IPX Retirement and PERA Administrators as recordkeepers for non-ERISA 403(b) plans. IPX Retirement is a leading provider of trust, custody, IRA, and recordkeeping services to the retirement plan industry. IPX Retirement requires these 403(b) assets to be held at Matrix Trust Company as custodian. Matrix Trust Company provides automated trust, custody and agent services for Qualified and Non-Qualified Retirement Plans.

Beacon Wealth Consultants is independently owned and operated and is not affiliated with Charles Schwab & Co., IPX Retirement, PERA Administrators, or Matrix Trust Company..

Not all advisers require or request that their clients use the services of a specified custodian. Should you elect to use another custodian, we may not be able to achieve the most favorable execution of client transactions.

Your custodian will hold your assets in a brokerage account and buy and sell securities when [we/you] instruct them to. Prior to engaging Beacon Wealth Consultants to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with us setting forth the terms and conditions under which we shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them.

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. In addition to commissions, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker/dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors.

Products and Services Available to Us from Schwab

Schwab Advisor Services is Schwab's business unit serving independent investment advisory firms like Beacon Wealth Consultants. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us to manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us as long as we keep a total of at least $10 million of our clients' assets in accounts as Schwab.

Services that benefit you: Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients.

Services that do not directly benefit you: Schwab also makes available to us other products and services that benefit us but could not directly benefit you or your account. These products and services assist us in managing and administering our client's accounts. They include investment research, both Schwab's own and that of third parties. We could use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition of investment research, Schwab also makes available software and other technology that:

- provides access to client account data (such as duplicate trade confirmations and account statements).
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data.
- facilitate payment of our fees from clients' accounts; and
- assist with back-office functions, recordkeeping, and client reporting.

Services that generally benefit only us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting
- publications and conferences on practice management and business succession
- access to employee benefits providers, human capital consultants and insurance providers

Schwab could provide these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab could also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Our interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services so long as we keep a total of at least $10 million of client assets in accounts a Schwab Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The $10 million minimum could give us an incentive to recommend that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker dealer is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab's services (see "How we Select Brokers/ Custodians to Recommend" above) and not Schwab's services that benefit only us.

Trade Aggregation

Where purchases or sales of the same security are being placed for execution at the same time for the accounts of two or more clients, Beacon Wealth Consultants could aggregate or "block" those trades for execution in order to seek more

favorable prices for all clients participating in the order. Generally, the securities purchased or proceeds received in such "block" transactions will be allocated among the client accounts participating in the order at the average price achieved for the order in accordance with the purchase or sale orders placed for each client account. Where insufficient securities are bought or sold in a "block" transaction to satisfy the orders for all participating client accounts, the securities or proceeds actually obtained generally will be allocated among the client accounts at the average price, pro rata in proportion to the size of the order placed for each such account, or in accordance with another allocation method that Beacon Wealth believes is reasonably designed to treat all participating clients fairly and equitably. Transaction costs for participating accounts will be assessed at the custodian's commission rate applicable to each account; therefore, transaction costs may vary among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other factors making the account's participation ineligible or impractical. Orders in ETFs that comprise less than 20% of the average daily trading volume

If an order is not aggregated, the sale or purchase will be placed as an individual trade. If the order is placed individually, we will place trades randomly, in no particular order. In situations where a client requests a sale or purchase individually, the trades are placed on a first-come, first-served basis.

From time to time, the Firm may utilize algorithmic trading tools provided by its custodian or executing broker to assist in the execution of certain client transactions. These tools may include volume-weighted average price ("VWAP") or similar execution algorithms designed to execute orders over a period of time with the objective of seeking efficient trade execution and potentially reducing trading costs.

Algorithmic execution may result in orders being executed more slowly than immediate market orders and may expose client trades to market movement during the execution period. While the Firm evaluates the use of these tools in an effort to obtain best execution for clients, there can be no assurance that the use of algorithmic trading will result in more favorable execution prices in all circumstances.

Trade Rotation

Given that assets are managed for a variety of clients in various programs, including those accounts for which we have discretion to trade and those for which we do not maintain trading discretion (i.e., model delivery programs), we use trade rotations designed to equitably execute transactions across all client accounts. Each platform or investment advisor using the model is included in the rotation, including Beacon Wealth Consultants client accounts using the same model. When a change is made to a model portfolio, we send notification to each member of the trade rotation schedule in order of their appearance on the rotation schedule. The rotation schedule is managed such that each group of clients can expect to receive executions at the beginning, middle, or end of trade rotations over time. By virtue of the non-discretionary nature of model delivery programs, execution and therefore portfolios, may differ slightly depending on capabilities and limitations specific to each platform.

Directed Brokerage

We have recommended Schwab's custodial and broker-dealer services to maximize efficiency and to be cost effective for clients. If you direct brokerage arrangements elsewhere, these economies of scale and levels of efficiency would generally be compromised when those alternative brokers were used. In fact, if you choose to use the brokerage and/or custodial services of alternative service providers, you can in fact experience a certain degree of delay in executing trades for your account(s) and other adverse effects on the management of your account(s).

By directing us to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with Beacon Wealth Consultants that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the

broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

Item 13 Review of Accounts

The Chief Compliance Officer (CCO) reviews client accounts for the appropriateness and suitability of the recommendations. The CCO or his designee monitors the account on a regular basis to determine the ongoing appropriateness of the investments. At least annually, individual clients are asked to meet with their investment adviser representatives. Reviews could be triggered by a change in general client circumstances (marriage, divorce, retirement) or changes in market conditions, economic indicators or geopolitical matters.

Beacon Wealth Consultants will provide clients with a quarterly performance report. Our performance reports will include account value, performance, and allocation and will be delivered according to client delivery preference selected on client advisory contract. Electronically delivered reports will be accessed through your client portal. If you wish to change report delivery preference between electronic and printed reports, please let us know. Our clients will also receive a statement at least quarterly from the custodian of their assets, which could be a broker/dealer, investment company or annuity.

Item 14 Client Referrals and Other Compensation

As noted above, we receive an economic benefit from Schwab in the form of support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at the Custodians. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices.*** The availability of Schwab's products and services to us is based solely on our participation in their advisory program and not in the provision of any particular investment advice.

Item 15 Custody

We have limited custody of client funds only to the extent that we deduct fees from your accounts. Your qualified custodian maintains actual physical custody of your assets per our advisory agreement. The qualified custodian of your assets sends quarterly statements directly to you. You should carefully review those statements and notify us of any questions or concerns. You should also notify us if the custodian fails to provide statements on each account held.

We also send performance and other account reports to you, and we urge you to compare these reports to the account statements you receive from the qualified custodian to ensure accuracy.

Item 16 Investment Discretion

We request that you give us discretionary authority to manage your custodial accounts held at Charles Schwab by signing a written power of attorney built into your advisory agreement. This discretion includes the ability to reallocate accounts, to deduct our advisory fees, and to make decisions to purchase or sell securities without consulting you the client. You can place reasonable restrictions on specific securities that we purchase or sell.

Item 17 Voting Client Securities

Authority to Vote Proxies

As part of its discretionary investment management services, ("the Firm") may vote proxies on behalf of Clients for securities held in their accounts. The Firm has adopted and implemented policies and procedures that are designed to

ensure that proxies are voted in the best interest of Clients. The Firm's proxy voting policies are designed to promote the long-term value of Clients' investments and to address any conflicts of interest that may arise in the voting process.

Conflicts of Interest
The Firm seeks to mitigate conflicts of interest in the proxy voting process by maintaining a structured approach to voting decisions. If a material conflict of interest arises, the Firm may:

- Follow pre-established voting guidelines,
- Seek independent third-party recommendations, or
- Disclose the conflict to affected Clients and obtain consent before voting.

Client Rights and Requests
Clients may request a copy of the Firm's **proxy voting policies and procedures** at any time. Additionally, Clients may request information regarding how proxies have been voted on their behalf. If a Client prefers to retain the right to vote proxies independently, they must notify the Firm in writing.

Use of Third-Party Voting Services
The Firm has engaged an independent third-party proxy voting service to assist in voting proxies and conducting research on proxy proposals. However, the Firm retains ultimate decision-making authority regarding proxy voting.

No Obligation to Vote Proxies
If the Client has not granted the Firm proxy voting authority, the Firm shall not be responsible for voting proxies on behalf of the Client and shall not provide advice regarding proxy proposals. In such cases, Clients are solely responsible for receiving and voting proxies.

Contact us if you have questions or would like a copy of our proxy voting policies.

Item 18 Financial Information

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you. We do not require nor solicit prepayment of more than $1,200 in fees per client, six months or more in advance. Therefore, we have no disclosure with respect to this item.