



Ballast, Inc.
(formerly Boardman Wealth Planning, Inc.)

Form ADV Part 2A – Disclosure Brochure

Effective: March 31, 2015

This Disclosure Brochure provides information about the qualifications and business practices of Ballast, Inc. (formerly Boardman Wealth Planning, Inc. and herein “Ballast”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (859) 226-0625 or by email at info@ballastplan.com.

Ballast is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Ballast to assist you in determining whether to retain the Advisor.

Additional information about Ballast and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of Ballast.

Ballast believes that communication and transparency are the foundation of its relationship and continually strives to provide its Clients with complete and accurate information at all times. Ballast encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

- Effective April 3, 2015, Boardman Wealth Planning, Inc. changed its legal name to Ballast, Inc.
- Effective April 3, 2015, the Advisor moved its offices to 360 E. Vine Street, Suite 320, Lexington, KY 40507. The Advisor’s new website is <http://www.ballastplan.com>.

Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

To review the firm information for Ballast:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Firm** and enter **152695** (our firm’s CRD number) in the field labeled “Firm Name or CRD# or SEC#” and click “Start Search”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (859) 226-0625 or by email at info@ballastplan.com.

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Item 4 – Advisory Services

A. Firm Information

Ballast, Inc. (formerly Boardman Wealth Planning, Inc. and herein “Ballast” or the “Advisor”) is a Registered Investment Advisor with the U.S. Securities Exchange Commission (“SEC”). Ballast commenced operations in 2010. Ballast was organized as an S Corporation under the laws of the Commonwealth of Kentucky in 2008 under the name Boardman Wealth Planning, Inc. and changed its legal name to Ballast, Inc. on April 3, 2015. Ballast is owned and operated by John V. Boardman, III (President) and Andrew J. Reynolds (Vice President). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Ballast.

B. Advisory Services Offered

Ballast offers investment advisory services to individuals, high net worth individuals and corporations (each referred to as a “Client”).

Investment Management Services

Ballast provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. Ballast works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. Ballast will then construct a portfolio, consisting of mutual funds, exchange-traded funds (“ETFs”), individual stocks and bonds, and options. The Advisor may also utilize REITs, oil and gas, and leasing partnerships to meet the needs of its Clients.

Ballast’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Ballast will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

Ballast evaluates and selects assets for inclusion in Client portfolios only after applying their internal due diligence process. Ballast may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Ballast may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Ballast may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

Prior to rendering investment advisory services, Ballast will ascertain, in conjunction with the Client, the Client’s financial situation, risk tolerance, and investment objective[s].

Ballast will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Ballast accept or maintain custody of a Client’s funds or securities, except for the authorized deduction of the Advisor’s fees. All Client assets will be managed within their designated brokerage account[s] or pension account[s], pursuant to the Client investment advisory agreement.

Managed Account Programs

Ballast may recommend to Clients that all or a portion of their portfolio be implemented by utilizing one or more unaffiliated money managers participating in a managed accounts program at the Client’s selected custodian (the “Program Sponsor”). The Client will then enter into a program and investment advisory agreement with the Program Sponsor and the participating money manager[s]. The Advisor will assist and advise the Client in establishing investment objectives for the account[s], the selection of the money manager[s], and defining any restrictions on the account[s]. Ballast will continue to provide oversight of the Client account[s] and ongoing monitoring of the activities of the unaffiliated money managers.

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These money managers will develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. In consideration for such services, the Program Sponsor will charge a program fee that includes the investment advisory fee of the money managers, the administration of the program and trading, clearance and settlement costs. The Program Sponsor and manager fees are billed separately from the Advisor's fee. The overall fee (including the Advisor's investment advisory fee) will not exceed 3% annually. Ballast does not receive any compensation from these unaffiliated money managers or the Program Sponsor, other than Ballast's investment advisory fee (described in Item 5).

The Client, prior to entering into an agreement with a Program Sponsor, will be provided with the Program Sponsor's Form ADV Part 2 (or a brochure that makes the appropriate disclosures). In addition, Ballast and its Client will agree in writing that that selected Program Sponsor will manage the Client's account[s] on a discretionary basis.

Financial Planning and Consulting Services

Ballast will typically provide a variety of financial planning and consulting services to individuals, families, and small businesses. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning or consulting services will involve preparing a financial plan or rendering a financial consultation based on the Client's specific financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of one's financial situation. Business consulting services are customized to the needs of the business and its owners.

Ballast may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements that do not encompass a complete plan, the Advisor may not provide a written report. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

C. Client Account Management

Prior to engaging Ballast to provide investment advisory services, each Client is required to enter into an investment advisory agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – Ballast, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.
- Asset Allocation – Ballast will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Ballast will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Ballast will provide investment management and ongoing oversight of the Client's portfolio.

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D. Wrap Fee Programs

Ballast does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Ballast.

E. Assets Under Management

As of December 31, 2014 Ballast manages the following assets:

| | |
|--------------------------|----------------------|
| Discretionary Assets | \$126,069,168 |
| Non-Discretionary Assets | \$187,287 |
| Total | \$126,256,455 |

Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign an investment advisory agreement that details the responsibilities of Ballast and the Client.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of each calendar quarter. Investment advisory fees range from 1.75% to 1.15% based on the following schedule:

| Assets Under Management | Annual Rate |
|----------------------------|-------------|
| Up to \$100,000 | 1.75% |
| \$100,001 to \$250,000 | 1.60% |
| \$250,001 to \$500,000 | 1.50% |
| \$500,001 to \$1,000,000 | 1.35% |
| \$1,000,001 to \$3,000,000 | 1.25% |
| \$3,000,001 to \$5,000,000 | 1.15% |
| Above \$5,000,000 | Negotiable |

Investment advisory fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Ballast will be independently valued by the designated Custodian. Ballast will not have the authority or responsibility to value portfolio securities.

Ballast also offers its investment management services for advisory fees based on a Client's net worth. This advisory fee structure is offered to Clients with outside assets that they wish to be advised by Ballast. Advisory fees are 0.75% of client net worth, calculated on an annual basis and paid quarterly in advance. For fee calculation purposes, Client net worth will be reassessed on the first quarter-end date following the anniversary date of the Client investment advisory agreement. This fee arrangement is typically offered to households with at least \$5,000,000 in net worth. Annual minimum advisory fee is \$10,000, which may be waived at the Advisor's discretion. For Clients under this arrangement, Ballast will waive its advisory fees for the portion of their portfolio that it manages on a discretionary basis.

Managed Accounts Programs

Fees for Clients participating in managed accounts programs will be charged a separate fee from the Program Sponsor, which includes the platform fee and the fees paid the respective manager[s].

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Financial Planning and Consulting Services

Ballast offers financial planning and consulting services on an hourly basis ranging from \$150 to \$500 per hour, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

B. Fee Billing

Investment Management Services

Investment advisory fees will be automatically deducted from the Client's account[s] by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 365 times the total number of days in the quarter) to the total assets under management with Ballast at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Ballast to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Managed Accounts Programs

The Program Sponsor will calculate and deduct the platform and manager fees. Ballast bills its investment advisory fee separately.

Financial Planning and Consulting Services

Financial planning and consulting fees may be invoiced up to 100% upon execution of the financial planning and consulting agreement or upon completion of the agreed-upon deliverable(s), pursuant to the agreement with each Client. Planning and consulting engagements are typically for a defined scope and period of time. The Advisor will not collect advance fees of \$1,200 or more for any services that will be completed in six months or longer. For longer-term engagements, the Advisor will bill the Client incrementally for periods of less than six months.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Ballast, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by Ballast is separate and distinct from these custodian and execution fees.

In addition, all fees paid to Ballast for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Ballast, but would not receive the services provided by Ballast which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Ballast to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Investment Management Services

Ballast is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their investment advisory agreement with Ballast, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's written approval.

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Managed Accounts Programs

The Program Sponsor will generally calculate and deduct its fees quarterly in arrears. In the event that a Client should wish to terminate their relationship with a managed accounts program or unaffiliated investment advisor, the terms for termination will be set forth in the respective agreements between the Client and those third parties. Ballast will assist the Client with the termination and transition as appropriate.

Financial Planning and Consulting Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed-upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

E. Compensation for Sales of Securities

Ballast does not buy or sell securities and does not receive any compensation for securities transactions in any Client account[s], other than the Investment Advisory Fees noted above.

Item 6 – Performance-Based Fees and Side-By-Side Management

Ballast does not charge performance-based fees for its investment advisory services. The fees charged by Ballast are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client. Ballast does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Ballast provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Corporations and Businesses – taxable business entities, investing cash reserves

The relative percentage of each type of Client is available on Ballast's Form ADV Part 1. These percentages will change over time. Ballast generally does not impose a minimum account size for establishing a relationship.

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

A. Methods of Analysis

Ballast primarily employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from Ballast is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, Ballast generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Ballast will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Ballast may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

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B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Ballast will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental Analysis. Ballast utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate.

Technical Analysis. Ballast may analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. These risks include:

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

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Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Ballast or any of its employees. Ballast and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in Form ADV Part 1, select the option for “Investment Adviser Search”, then selecting “Firm” and enter 152695 in the field labeled “Firm Name or CRD# or SEC#”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

Item 10 – Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Certain Advisory Persons of Ballast are also registered representatives of Comprehensive Asset Management and Servicing, Inc. ("CAMAS") of Parsippany, New Jersey. CAMAS is a registered broker-dealer (CRD No. 43814), member FINRA, SIPC. In their separate capacity as registered representatives, these Advisory Persons will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory Person of Ballast. Neither the Advisor nor its Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in an Advisory Person's separate capacity as a registered representative.

Insurance Agency Affiliations

Advisory Persons of Ballast may also serve as sales agent for various insurance companies. This activity is performed separate and apart from their advisory role with Ballast. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or its Advisory Persons.

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

A. Code of Ethics

Ballast has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Ballast. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Ballast and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Ballast associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (859) 226-0625 or via email at info@ballastplan.com.

B. Personal Trading with Material Interest

Ballast allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Ballast does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Ballast does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Ballast allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of

Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, employees of Ballast may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Ballast requiring reporting of personal securities trades by its employees for review by the employee's supervisor or the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

D. Personal Trading at Same Time as Client

While Ballast allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time, will Ballast or any associated person of Ballast, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Ballast does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize Ballast to direct trades to this custodian as agreed in the investment advisory agreement. Further, Ballast does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Ballast does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by Ballast. Ballast typically recommends to Clients that they established their brokerage account[s] at TD Ameritrade Institutional, a division of TD Ameritrade, Inc. (herein "TD Ameritrade"). TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and FINRA/SIPC/NFA member. TD Ameritrade offers to independent investment advisors its services, which include custody of securities, trade execution, clearance and settlement of transactions. Ballast receives some benefits from TD Ameritrade through its participation in the program.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. As many of these services could be considered to provide a benefit to Ballast, and because the "soft dollars" used to acquire these services are Client assets, Ballast may have a conflict of interest in recommending a particular broker or dealer to execute Client transactions and the transaction compensation charged by that broker-dealer might not be the lowest compensation the Client might be able to obtain.

Ballast receives compensation and economic benefits from TD Ameritrade by participating in TD Ameritrade's Soft Dollar Program. This compensation may result in a conflict of interest between the Advisor and the Client as Ballast could have an incentive to cause Clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.

Ballast's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), Ballast will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, we generally determine, considering all the factors described below, that the compensation to be paid to TD Ameritrade is reasonable in relation to the value of all the brokerage and research products and services provided by TD Ameritrade. In making this determination, we typically consider not only

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the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular Client, but also the value of those services and products in our performance of our overall responsibilities to all of our Clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer for a particular transaction or set of transactions may be greater than the amounts another broker-dealer that did not provide research services or products might charge. Generally, in addition to a broker's ability to provide "best execution," we may also consider the value of "research" or additional brokerage products and services the broker-dealer has provided or may be willing to provide.

2. Brokerage Referrals - Ballast does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Ballast will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account[s]) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, Ballast will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Ballast will execute its transactions through an unaffiliated broker-dealer selected by the Client. Ballast may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by Mr. Boardman or Mr. Reynolds. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Ballast if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Ballast

Broker-Dealer Affiliation

Advisory Persons are also registered representative of CAMAS as noted in Item 10. In their separate capacity as registered representatives, Mr. Boardman and Mr. Reynolds will typically receive commissions for the implementation of recommendations for commissionable transactions.

Insurance Agency Affiliations

Advisory Persons may also serve as sales agents for various insurance companies. This activity is done separate and apart from their advisory roles with the Ballast. As an insurance agent, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold.

Participation in Institutional Advisor Platform

As disclosed in Item 12 above, Ballast participates in TD Ameritrade's institutional program and may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Ballast's participation in the program and the investment advice it gives to its Clients, although Ballast receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Ballast by third party vendors.

Some of the products and services made available by TD Ameritrade through the institutional program may benefit Ballast but may not benefit its Client accounts. These products or services may assist Ballast in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Ballast manage and further develop its business. The benefits received by Ballast or its personnel through participation in the institutional program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to its Clients, the Ballast endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Ballast or its advisory persons in and of itself creates a potential conflict of interest and may indirectly influence the Ballast's recommendation of TD Ameritrade for custody and brokerage services.

B. Client Referrals from Solicitors

Ballast does not engage paid solicitors for Client referrals.

Item 15 – Custody

Ballast does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Ballast to utilize that custodian for the Client's security transactions. Ballast encourages Clients to review statements provided by account custodian for accuracy. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices."

Item 16 – Investment Discretion

Ballast generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Ballast. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such

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authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Ballast will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Ballast does not accept proxy-voting responsibility for any Client.

Item 18 – Financial Information

Neither Ballast, nor its management, have any adverse financial situations that would reasonably impair the ability of Ballast to meet all obligations to its Clients. Neither Ballast, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Ballast is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

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Form ADV Part 2B – Brochure Supplement
for

John V. Boardman, III
President and Chief Compliance Officer

Effective: March 31, 2015

This Brochure Supplement provides information about the background and qualifications of John V. Boardman, III (CRD# 4595652) in addition to the information contained in the Ballast, Inc. (formerly Boardman Wealth Planning, Inc. and herein “Ballast” or the “Advisor”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or Ballast’s Disclosure Brochure, please contact us at (859) 226-0625 or by email at info@ballastplan.com.

Additional information about John V. Boardman, II is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

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Item 2 – Educational Background and Business Experience

The President and Chief Compliance Officer of Ballast is John V. Boardman, III. Mr. Boardman, born in 1979, is a dedicated Portfolio Manager for Client accounts of Ballast. Mr. Boardman earned a Bachelor of Science from Centre College in 2001. Additional information regarding Mr. Boardman's employment history is included below.

Employment History:

| | |
|--|-----------------|
| President and Chief Compliance Officer, Ballast, Inc. (formerly Boardman Wealth Planning, Inc.) | 2010 to Present |
| Registered Representative, Comprehensive Asset Management and Servicing | 2010 to Present |
| Owner, Boardman Co., LLC | 2004 to Present |
| Registered Representative, LPL Financial, Inc. | 2005 to 2010 |

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Boardman. Mr. Boardman has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Boardman.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and /or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Boardman.* However, we do encourage you to independently view the background of Mr. Boardman on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for "Individual" and enter 4595652 in the field labeled "Individual Name or CRD#".

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Boardman is also registered representative of Comprehensive Asset Management and Servicing, Inc. ("CAMAS") of Parsippany, New Jersey. CAMAS is a registered broker-dealer (CRD No. 43814), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Boardman will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendations provided by Mr. Boardman. Neither the Advisor nor Mr. Boardman will earn ongoing investment advisory fees in connection with any services implemented in Mr. Boardman's separate capacity as a registered representative.

Insurance Agency Affiliations

Mr. Boardman also serves as sales agent for various insurance companies. This activity is performed separate and apart from his advisory role with Ballast. As an insurance professional, Mr. Boardman may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or Mr. Boardman.

Item 5 – Additional Compensation

Mr. Boardman has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

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Item 6 – Supervision

Mr. Boardman serves as the President and Chief Compliance Officer of Ballast. Mr. Boardman can be reached at (859) 226-0625.

Ballast has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Ballast. Further, Ballast is subject to regulatory oversight by various agencies. These agencies require registration by Ballast and its employees. As a registered entity, Ballast is subject to examinations by regulators, which may be announced or unannounced. Ballast is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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Form ADV Part 2B – Brochure Supplement

for

**Andrew J. Reynolds, CFP®, MBA
Vice President**

Effective: March 31, 2015

This Brochure Supplement provides information about the background and qualifications of Andrew J. Reynolds, CFP, MBA (CRD# 5603070) in addition to the information contained in the Ballast, Inc. (formerly Boardman Wealth Planning, Inc. and herein “Ballast” or the “Advisor”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or Ballast’s Disclosure Brochure, please contact us at (859) 226-0625 or by email at info@ballastplan.com.

Additional information about Mr. Reynolds is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

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Item 2 – Educational Background and Business Experience

Andrew J. Reynolds, CFP®, MBA is the Vice President of Boardman Wealth Planning, Inc. Mr. Reynolds, born in 1985, is dedicated to serving the Clients of Ballast. Mr. Reynolds earned a Master of Business Administration from the University of Kentucky in 2009. Mr. Reynolds earned his Bachelor of Science from Centre College in 2007. Additional information regarding Mr. Reynolds's employment history is included below.

Employment History:

| | |
|---|--------------------|
| Vice President, Ballast, Inc. (formerly Boardman Wealth Planning, Inc.) | 03/2010 to Present |
| Registered Representative, Comprehensive Asset Management & Servicing, Inc. | 03/2010 to Present |
| Assistant, LPL Financial | 10/2009 to 03/2010 |

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Reynolds. Mr. Reynolds has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Reynolds.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Reynolds.* However, we do encourage you to independently view the background of Mr. Reynolds on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter 5603070 in the field labeled "Individual Name or CRD#".

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Reynolds is also registered representative of Comprehensive Asset Management and Servicing, Inc. ("CAMAS") of Parsippany, New Jersey. CAMAS is a registered broker-dealer (CRD No. 43814), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Reynolds will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendations provided by Mr. Reynolds. Neither the Advisor nor Mr. Reynolds will earn ongoing investment advisory fees in connection with any services implemented in Mr. Reynolds' separate capacity as a registered representative.

Insurance Agency Affiliations

Mr. Reynolds also serves as sales agent for various insurance companies. This activity is performed separate and apart from his advisory role with Ballast. As an insurance professional, Mr. Reynolds may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Advisor or Mr. Reynolds.

Item 5 – Additional Compensation

Mr. Reynolds has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

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Item 6 – Supervision

Mr. Reynolds serves as the Vice President of Ballast and is supervised by Mr. John Boardman, the Chief Compliance Officer. Mr. Boardman can be reached at (859) 226-0625.

Ballast has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Ballast. Further, Ballast is subject to regulatory oversight by various agencies. These agencies require registration by Ballast and its employees. As a registered entity, Ballast is subject to examinations by regulators, which may be announced or unannounced. Ballast is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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Form ADV Part 2B – Brochure Supplement

for

**Cameron K. Hamilton
Director of Financial Planning and Research**

Effective: March 31, 2015

This Brochure Supplement provides information about the background and qualifications of Cameron K. Hamilton (CRD# **6264219**) in addition to the information contained in the Ballast, Inc. (formerly Boardman Wealth Planning, Inc. and herein “Ballast” or the “Advisor”) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Ballast Disclosure Brochure or this Brochure Supplement, please contact us at (859) 226-0625 or by email at info@ballastplan.com.

Additional information about Mr. Hamilton is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

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Item 2 – Educational Background and Business Experience

Cameron Hamilton is the Director of Financial Planning and Research of Ballast. Cameron Hamilton, born in 1989, is dedicated to advising Clients of Ballast. Mr. Hamilton earned a Bachelor of Science from the University of Kentucky in 2012. Mr. Hamilton earned a Master of Business Administration (MBA) from the University of Kentucky in 2014.

Additional information regarding Mr. Hamilton's employment history is included below.

Employment History:

| | |
|---|--------------------|
| Director of Financial Planning and Research, Ballast, Inc. (formerly Boardman Wealth Planning, Inc.) | 10/2013 to Present |
| Registered Assistant, Comprehensive Asset Management & Servicing, Inc. | 06/2014 to Present |
| Labor, Kentucky Seal Coat Inc. | 05/2012 to 08/2012 |
| K Crew Coordinator, UK New Student and Parent Programs | 11/2010 to 12/2011 |
| Chemistry Peer Excel Instructor, UK Dept of Chemistry | 08/2009 to 05/2010 |
| Labor, McMahan Powder Company | 05/2007 to 08/2009 |
| Umpire, Elizabethtown Area Baseball Commissioner | 05/2004 to 08/2008 |

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Hamilton. Mr. Hamilton has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Hamilton.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Hamilton.** However, we do encourage you to independently view the background of Mr. Hamilton on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select "Investment Adviser Search" from the left navigation menu. Then select the option for "Individual" and enter 6264219 in the field labeled "Individual Name or CRD#".

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Hamilton is also a registered representative of Comprehensive Asset Management & Servicing, Inc. ("CAMAS") of Parsippany, NJ. CAMAS is a registered broker-dealer (CRD No. 43814), member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Hamilton will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Hamilton. Neither the Advisor nor Mr. Hamilton will earn investment advisory fees in connection with any services implemented in Mr. Hamilton's separate capacity as a registered representative where commissions are earned.

Generally, recommendations made by Ballast to its Clients are implemented by Mr. Hamilton in his role as an Director of Financial Planning and Research, not in his role as a Registered Representative. As such, Clients of Ballast will only pay advisory fees as described above. In no circumstances will Ballast earn an advisory fee and a commission on the same investment. In the event that Mr. Hamilton earns a commission on an investment, the advisory fee will be waived by Ballast.

Insurance Agency Affiliations

Mr. Hamilton, Director of Financial Planning and Research of Ballast, may serve as a sales agent for various insurance companies. This activity is done separate and apart from his role with Ballast. As an insurance agent, Mr. Hamilton may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory

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fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Hamilton or the Advisor.

Item 5 – Additional Compensation

Mr. Hamilton has additional business activities that are detailed in “Item 4 - Other Business Activities” in Part 2B above.

Item 6 – Supervision

Mr. Hamilton serves as the Director of Financial Planning and Research of Ballast and is supervised by John Boardman, the Chief Compliance Officer. John Boardman can be reached at (859) 226-0625.

Ballast has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Ballast. Further, Ballast is subject to regulatory oversight by various agencies. These agencies require registration by Ballast and its employees. As a registered entity, Ballast is subject to examinations by regulators, which may be announced or unannounced. Ballast is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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Privacy Policy

Effective: March 31, 2015

Our Commitment to You

Ballast, Inc. (formerly Boardman Wealth Planning, Inc. and herein "Ballast") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Ballast (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

Ballast does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

| | |
|--|---------------------------------|
| Social security or taxpayer identification number | Assets and liabilities |
| Name, address and phone number(s) | Income and expenses |
| E-mail address(es) | Investment activity |
| Account information (including other institutions) | Investment experience and goals |

What sources do we collect information from in addition to you?

| | |
|---|---|
| Custody, brokerage and advisory agreements | Account applications and forms |
| Other advisory agreements and legal documents | Investment questionnaires and suitability documents |
| Transactional information with us or others | Other information needed to service account[s] |

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How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

| Basis for sharing | Sharing | Limitations |
|--|--|--|
| Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to: <ul style="list-style-type: none">• Processing transactions;• General account maintenance;• Responding to regulators or legal investigations; and• Credit reporting, etc. | Ballast may share this information. | Clients cannot limit the Advisor's ability to share. |
| Administrators We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested. | Ballast may share this information. | Clients cannot limit the Advisor's ability to share. |
| Marketing Purposes Ballast does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Ballast or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes. | Ballast does not share personal information. | Clients cannot limit the Advisor's ability to share. |
| Authorized Users In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative. | Ballast does share personal information. | Clients can limit the Advisor's ability to share. |
| Information About Former Clients Ballast does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients. | Ballast does not share personal information regarding former clients | Clients can limit the Advisor's ability to share. |

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How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.

Our employees are advised about Ballast's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.

Changes to our Privacy Policy.

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Questions: You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (859) 226-0625 or via email at info@ballastplan.com.

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