

CENTURION COUNSEL, INC.
STRATEGIC ASSET ALLOCATION PROGRAM
Wrap Fee Brochure
CRD# 110083

April 15, 2020

4995 Murphy Canyon Road
Suite 300
San Diego, CA 92123
(619) 391-2383

This wrap fee program brochure provides information about the qualifications and business practices of Centurion Counsel, Inc. and the Strategic Asset Allocation Program. If you have any questions about the contents of the brochure, please contact us at (619)-391-2383 or visit our website, www.centurioncounsel.com. 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.

Registration does not imply a certain level of skill or training. When a copy of the Brochure Document(s) is not provided to the client at least 48 hours prior to signing the contract(s), client has five business days in which to cancel the contract, without penalty.

Additional information about Centurion Counsel, Inc. also is available on the SEC's website www.adviserinfo.sec.gov.

ITEM 2 - SUMMARY OF MATERIAL CHANGES

Centurion Counsel, Inc. has amended this brochure to reflect our new office address as of March 2019.

Centurion is in the process of transitioning from a SEC registered investment adviser to a state registered investment adviser.

Centurion will make revised copies of our brochures available on our website at www.centurioncounsel.com. Centurion brochures also may be requested by contacting us at (619)-391-2383 or by email at info@centurioncounsel.com

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ITEM 4 - SERVICES, FEES & COMPENSATION

Centurion Counsel, Inc. ("Centurion") offers Strategic Asset Allocation ("SAA"), a comprehensive asset allocation and discretionary portfolio management program for institutional and individual investors. SAA provides portfolio design and implementation on a comprehensive basis.

Centurion manages the SAA program on a discretionary basis for institutional portfolios or individual clients who have specific objectives such as long-term growth or current income.

Centurion will charge the first investment management fee when funds are placed under management and then at the beginning of each quarter thereafter. The quarterly fee is based on the fee schedule agreed to by the client, multiplied by the market value of the account at the end of the previous quarter. The investment management fee may be deducted directly from the client's brokerage account. Each client will receive an invoice with their performance reports detailing the amount of the fee and the method of computation. Funds added to an existing SAA account will be charged a pro-rata fee. Under the SAA program, Centurion is not compensated on the basis of a share or percentage of the capital gain or appreciation in the client's SAA account.

The SAA maximum* quarterly fee schedule is:

On the first	\$250,000	0.60%
On the next	\$250,000	0.55%
On the next	\$500,000	0.50%
On the next	\$1,000,000	0.40%
Thereafter		0.35%

*Under certain circumstances, management fees may be negotiated between the client and Centurion.

In the event of early termination of the management agreement, fees paid through the end of the quarter, if any, will be refunded on a prorated basis.

Centurion has agreements with various broker/dealers and registered investment advisors ("solicitors") to refer clients to Centurion. The agreements provide that a percentage of the investment fee charged to the client will be paid to the solicitor, as disclosed in the SAA Program Agreement. The compensated persons are properly registered as solicitors and follow the requirements under CCR section 260.236.(c).(2) and by applicable Federal and State regulations.

Solicitors under Centurion's current agreement do not solicit to California residents. Compensated persons will only solicit in states in which they are properly registered.

Participating in a wrap fee program may cost more or less than the cost of purchasing such services separately from a broker or dealer. The benefits under a wrap fee program depend, in part, upon the size of the client's account and the number of transactions likely to be generated in the account. For example, wrap fee accounts may not be suitable for accounts with little activity comprised principally of fixed income securities.

Generally, the client will not pay any securities commissions as they are paid by Centurion out of the investment management fee. However, a small administrative fee is charged on each stock, bond, and option transaction.

Clients may also pay other fees related to and imposed by issuers of certain investments, primarily mutual funds or other direct investments, if appropriate to meet the portfolio allocations.

If mutual funds are appropriate to meet the portfolio allocations, the client will pay their proportionate share of the mutual funds' management and administrative fees, sales charges, annual marketing or distribution fees, and may incur certain deferred sales charges on previously purchased mutual funds if transferred into the account. Further information regarding charges and fees assessed by a mutual fund is available in the appropriate prospectus. Centurion Counsel does not receive any portion of these fees.

ITEM 5 – ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

The SAA Program is available for individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

The SAA Program requires a minimum account value of \$250,000, but under certain circumstances, the minimum account size may be lowered.

ITEM 6 – PORTFOLIO MANAGER SELECTION AND EVALUATION

Centurion Counsel does not use third party managers for our Strategy Allocation Wrap Fee Program. Our portfolio manager is Jack Heilbron, President and Chief Investment Officer of Centurion Counsel, Inc.

ADVISORY BUSINESS

Centurion designs a comprehensive asset allocation discretionary portfolio management program for each qualified individual and institutional investor. The SAA program seeks to achieve specific risk limits and reward objectives for each individual client portfolio.

As the investment advisor, Centurion uses a variety of software programs that contain historic market performance and correlation to optimize a client's portfolio. These advisory tools help analyze risk and reward parameters of a prospective client's current portfolio prior to designing alternative portfolios that may have higher or lower risk and rewards. In some cases, the client's current portfolio may include assets which are integrated into the alternative portfolio options because they meet the optimized requirements, or the client has specified special social, religious, or philosophical limitations for the portfolio design. The client, whether individual or institutional, has the final authority to determine the risk and reward objectives as proposed by the alternative portfolios presented to the client.

PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

Centurion does not charge or receive performance based fees. All assets managed by Centurion are managed on a discretionary basis. We do not managed non-discretionary accounts. As of September 30, 2019, our discretionary assets under management total \$44,421,401.

Clients may from time to time impose restrictions with regard to the types of securities held in their accounts. Centurion does our best to accommodate such requests to the extent such accommodation does not hinder us from employing our Strategic Allocation strategy.

METHODS OF ANALYSIS, INVESTMENTS STRATEGIES & RISK OF LOSS

Centurion seeks to achieve specific risk limits and reward objectives for each individual client portfolio. The underlying concept of SAA is Modern Portfolio Theory ("MPT"), which was developed in the 1950s by Professors Henry Markowitz (University of Chicago) and William Sharpe (Stanford University). MPT established that volatility of results could be reduced by portfolio diversification among asset classes that have negative correlation. MPT determined a method of diversification called optimization, which sought to provide the maximum long-term return for the lowest short-term volatility (risk) that an investor is willing to assume.

Asset Allocation Style – This management style focuses on relatively broad asset classes (i.e., stocks or bonds). The focus then will be made on identifying different classes of assets that have demonstrated different behavior characteristics from each other during various economic and capital market cycles. Different asset mixes provide alternative combinations of risk and reward.

VOTING CLIENT SECURITIES

The language in the Advisory Agreement signed by each client authorizes the advisor to vote proxies with respect to any securities held in an account. Our procedures for proxy voting are below:

Centurion Counsel Proxy Voting Procedures Specific guidelines on how Centurion will vote proxies on behalf of the client:

Auditors: We will vote for proposals to ratify auditors unless any of the following apply: an auditor has a financial interest in association with the company, and is therefore not independent, it is not clear that the auditors will be able to fulfill their function, fees for non-audit services are excessive, or there is reason to believe the independent auditors have rendered an opinion that is neither accurate nor indicative of the company's financial position.

Board of Directors: Votes for election of directors must be evaluated on a case-by-case basis, considering the following factors: long-term financial performance of the company relative to its industry, independence of the board and key board committees, management's track record, attendance of board meetings, corporate governance, and takeover provisions.

We will generally oppose all proposals to classify the board.

We will generally vote for all proposals to repeal classified boards and to elect all directors annually. In the event of a contested election, we will evaluate what each side is offering shareholders as well as the likelihood that the proposed objectives and goals can be met, and any background to the proxy contest.

Compensation Programs: Votes with respect to compensation programs will be determined on a case-by-case basis. We will generally vote against equity-based plans where the total dilution is excessive, we will vote against plans that allow companies the ability to re-price out of the money options without shareholder approval, we will vote against plans that issue options with an exercise price below the stock's current market price or plans that have the ability to issue reload options. We will generally support the use of employee stock purchase plans provided that shares purchased under the plan are acquired for no less than 85% of their market value.

Shareholder Proposals: Shareholder proposals can be complex and are often of dubious value. We will review shareholder proposals on a case-by-case basis and evaluate as follows:

- We will vote for shareholder proposals asking that a majority or more of the directors be independent;
- We will vote on a case-by-case basis regarding shareholder proposals requiring that the positions of chairman and CEO be held separately;
- We will generally oppose shareholder social and environmental proposals that are, in our estimation, of dubious value;
- We will generally vote for shareholder proposals asking that the board, audit, compensation and/or nominating committees be composed exclusively of independent directors;
- We will generally vote for proposals to lower barriers to shareholder action, and for proposals to allow cumulative voting;
- We will generally vote for shareholder proposals that require a company to submit its poison pill for shareholder ratification;
- We will vote against any proposal where the proxy materials lack sufficient information upon which to make an informed decision;
- We will generally vote against any proposal to create a new class of common stock with superior voting rights;
- We will vote any matters not specifically covered by these proxy policies and procedures in the economic best interest of advisory clients.

Centurion Counsel's proxy policies may be amended from time to time.

ITEM 7 - CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Centurion Counsel does not use third party managers for our Strategy Allocation Wrap Fee Program. Our portfolio manager is Jack Heilbron, President and Chief Investment Officer of Centurion Counsel, Inc. Client information is not shared with any third party portfolio managers.

ITEM 8 - CLIENT CONTACT WITH PORTFOLIO MANAGERS

Strategic Allocation Program clients are welcome to contact the program's Portfolio Manager.

ITEM 9 – ADDITIONAL INFORMATION

DISCIPLINARY

There are no legal or disciplinary events material to a client's or prospective client's evaluation of Centurion's business that have occurred in the previous ten (10) years. Centurion does not recommend or select other investment advisors for our clients.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Our principals, Jack Heilbron and Steven Foss are control persons of Presidio Property Trust (Presidio), a Maryland corporation that operates a Real Estate Investment Trust, as defined under

Internal Revenue Code, and NetREIT Dubose Model Homes, Inc.(NetREIT). Mr. Heilbron serves as President of both entities and Mr. Foss serves as Vice President and Director of Client Relations of Presidio.

Mr. Heilbron is also President of Puppy Toes, Inc., a California corporation and parent company of Centurion Counsel, Inc.

Mr. Foss is a registered securities representative of Ceros Financial Services Inc., a registered broker-dealer, member of the Financial Industry Regulatory Authority ("FINRA"), and SIPC.

Although Mr. Foss does not engage in the sale of commission products, as a registered representative of a securities broker-dealer, Mr. Foss has the ability to recommend securities and financial products and receive a commission. Therefore, a conflict of interest could exist between our interests and your interests.

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

As an investment advisor, Centurion is a fiduciary. It owes its clients/investors the highest duty of loyalty and relies on each employee to avoid conduct that is or may be inconsistent with that duty. It is also important for employees to avoid actions that, while they may not actually involve a conflict of interest or an abuse of a client/investor's trust, may have the appearance of impropriety. Because Centurion may serve as a general Network, investment manager and/or investment advisor to a number of types of separate accounts (collectively throughout "clients/investors") we have adopted a Code of Ethics setting forth policies and procedures, including the imposition of restrictions on itself and employees, to the extent reasonably necessary to prevent certain violations of applicable law.

The Code of Ethics adopted by Centurion is based on a few basic principles that should pervade all reasonable investment related activities of all employees, personal as well as professional:

- The interests of the Centurion's clients/investors come before Centurion's interest or those of any Centurion employee;
- each employee's professional activities and personal investment activities must be consistent with this code and void any actual or potential conflict between the interests of clients/investors and those of Centurion or the employee;
- these activities must be conducted in a way that avoids any abuse of an employee's position of trust with and responsibility to Centurion and its clients/investors, including taking inappropriate advantage of that position.

A copy of the Code of Ethics is available to any client or prospective client upon request.

It is our policy to impose specific requirements related to each personal trading and investment activity for each Centurion staff member. As such, our policy is to consider the effects of various types of trading, including short-term trading and trading in new issues as a potential conflict of interest. Similarly, we may impose specific requirements related to investments in private placements.

Approval may be refused for any proposed trade by an employee that:

- Involves a security that is being or has been purchased or sold by the Advisor on behalf of any client/investor's account or is being considered for purchase or sale;
- Is otherwise prohibited under any internal policies of the Advisor;
- Breaches the employee's reasonable fiduciary duty to any client/investor;
- Is otherwise inconsistent with applicable law, including the Investment Adviser's Act of 1940 and the Employee Retirement Income Security Act of 1974, as amended;
- Creates an appearance of impropriety.

Centurion Counsel, Inc. discloses conflicts of interest and potential conflicts of interest to clients prior to the client entering or renewing an advisory agreement with Centurion.

Principals of Centurion Counsel, Inc. also serve as principals or control persons of Presidio Property Trust, Inc., a real estate investment trust. Presidio Property Trust's most recent offering was closed in December 2011 and Presidio Property is not currently offering any additional offerings.

Clients who hold shares of the prior offering are not charge advisory fees on that portion of their portfolio.

Centurion Counsel, Inc. does not buy securities from nor sell securities to clients from its own inventory.

There are instances where principals of Centurion Counsel may purchase or sell the same securities in their personal accounts that are held in client accounts. Centurion mitigates this conflict of interest by requiring pre-clearance authorization for all personal trades and reviews personal account activity in their principals' brokerage accounts.

There are instances where principals of Centurion Counsel may recommend to clients the purchase or sale of securities that are also held by principals of Centurion. Centurion mitigates this conflict of interest by requiring pre-clearance authorization for all personal trades and reviews personal account activity in their principals' brokerage accounts.

Centurion Counsel, Inc. does not have any affiliation with, nor act as adviser to any investment company.

REVIEW OF ACCOUNTS

All positions are reviewed daily by Steven T. Foss, Vice President Operations and Chief Compliance Officer to determine whether trade executions have been successfully completed and whether cash levels are appropriate. On a quarterly basis, the analyst compares each account's asset allocations to the client's specific portfolio model and prepares a report for the Chief Investment Officer. Depending on market conditions, the Chief Investment Officer may review accounts more frequently.

Performance information is reviewed for accuracy by Centurion's Operations Department. The review process consists of reconciling account positions comparing each account's performance for deviations from other accounts. Performance information is calculated on a uniform and consistent basis using a time-weighted rate of return in accordance with guidelines published by the

Association for Investment Management and Research (AIMR). The performance information is not reviewed by a third party.

CLIENT REFERRALS AND OTHER COMPENSATION

No economic benefits (i.e., sales, awards, or prizes) are provided by someone who is not a client to the advisor for providing investment advice or other advisory services to our clients. The advisor may compensate persons not directly supervised by the advisor (soliciting agents) for client referrals. Such persons are properly registered as investment adviser representatives with other registered investment advisers. All soliciting agents and their referred clients sign the page of the management agreement. A sample of this agreement is shown below:

The Investment Advisor is:

Centurion Counsel, Inc.

4995 Murphy Canyon Road, Suite 300

San Diego, CA 92123

Tel: 619-391-2383

Fax: 760-471-0399

The Soliciting Agent is:

Name of Soliciting Agent

Name of Soliciting Agent's
Broker/Dealer

Please be advised that the above name solicitor or broker/dealer, if any, has entered into a solicitation with Centurion Counsel, Inc. (hereafter "Centurion") whereby the former will receive compensation for referral of the client to Centurion's asset management programs. All solicitors have a financial interest in the selection of the investment advisor.

The solicitor will be compensated 50% of the fees paid to Centurion pursuant to the client Discretionary Management Agreement. This compensation shall continue for as long as Centurion manages client funds and the above solicitor or broker/dealer is the Soliciting Agent of record. The solicitor may receive a commission, if any, on a bond, stock, gold, or other fund(s) or annuity which is purchased in the account. Additionally, Centurion may provide periodic educational and training sessions whereby Centurion pays for this travel and other affiliated expenses for the soliciting agent and his/her spouse. Notably a client would be charged the same management fees whether working directly with Centurion or referred by a solicitor.

FINANCIAL INFORMATION

Centurion does not require or solicit prepayment of more than \$1,200 in fees per client, six (6) months or more in advance and is not required to include a balance sheet for the most recent fiscal year.

As an investment advisor, Centurion has discretionary authority but not custody of client funds or securities. Because of the discretionary authority, the advisor is required to disclose any financial condition that is reasonably likely to impair the ability to meet contractual commitments to clients. Centurion has no unfavorable financial condition to disclose.

Centurion has not been the subject of a bankruptcy petition at any time during the past ten (10) years.

BROKERAGE PRACTICES

Centurion does not have any soft dollar arrangements.

Centurion clients' brokerage accounts are placed with Ceros Financial Services, who introduces the accounts to its fully disclosed clearing firm, National Financial Services, LLC., who serves as your qualified custodian. Centurion is not affiliated with Ceros or National Financial Services.

Centurion Counsel, Inc. has the discretionary authority to choose the broker/dealer to be used to purchase or sale of securities for client's accounts and for commission rates to be paid, if applicable. We have chosen Ceros Financial Services, Inc. and their clearing firm, NFS, based on a wide range of factors, including quality of execution, responsiveness and support with trading and back office operations, technology and transactional charges.

Centurion performs a best execution review to help ensure that clients receive best execution and reasonable rates when trades are executed.

CUSTODY

Centurion does not act as custodian for client assets. Assets in client brokerage accounts introduced by Ceros Financial Services, Inc., Member FINRA/SIPC and held in custody at a National Financial Services, LLC. National Financial Services, LLC, as custodian, produces and mails detailed account statements and trade confirmations directly to you on a monthly basis. If there is no activity in the account, National Financial Services, Inc. will mail you a quarterly statements. Centurion is deemed to have limited custody solely because advisory fees are directly deducted from client's accounts by the custodian on behalf of Centurion.

- a. that CCI possesses written authorization from the client to deduct advisory fees from an account held by a qualified custodian;
- b. that CCI sends the qualified custodian written notice of the amount of the fee to be deducted from the client's account and
- c. that CCI sends the client a written invoice itemizing the fee, including any formulae used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.

INVESTMENT DISCRETION

When you enter into an advisory agreement with Centurion, you are authorizing us to place your funds into our Strategic Allocation Wrap Fee Program. As a participant of Strategy Allocation Wrap Fee Program, you are also authorizing us to manage the account on your behalf, granting us discretionary authority of the purchase and sale of securities within your account. Lower fees for comparable services may be available from other sources. Clients wishing to place restrictions on certain types of trading within their accounts should notify us in writing. We will do our best to accommodate these special situations within the strategic asset allocation program.

ITEM 10 – REQUIREMENTS FOR STATE REGISTERED ADVISERS

Principal Officers and Management Persons

Centurion Counsel's principals are Jack K. Heilbron and Steven T. Foss. Mr. Heilbron is President and Chief Investment Officer of Centurion Counsel and supervised by Mr. Foss, who serves as Vice President, Operations and Chief Compliance Officer. Mr. Foss' supervision of Mr. Heilbron's day to day investment management includes, but is not limited to the following: Review of trading activity, all account activity, review of Mr. Heilbron's personal trading and brokerage activity, review of code of ethics and transactional reports, review of email and other communications, operations and recordkeeping. Mr. Foss may be reached by phone at (619)-391-2383, by email to sfoss@centurioncounsel.com, or in writing at the Centurion Counsel office at 4995 Murphy Canyon Road, Suite 300, San Diego, CA 92123.

Other Business Activities

Mr. Heilbron and Mr. Foss' other business activities and industry affiliations are disclosed in Item 10 and in Part 2B and listed below:

- Sponsor or syndicator of limited partnerships – Mr. Heilbron is the CEO of Presidio Property Trust, Inc., a Maryland corporation that operates as a Real Estate Investment Trust, as defined under Internal Revenue Code, and NetREIT Dubose Model Homes, Inc. Mr. Foss serves as the Vice President of Operations and Director of Client Relations for Presidio Property Trust, Inc. and NetREIT Dubose Model Homes, Inc.
- Mr. Heilbron is also the President of Puppy Toes, Inc., a California Corporation
- Broker/dealer – Mr. Foss is a registered representative with Ceros Financial Services, Inc., Member FINRA/SIPC, a broker/dealer.
- Other than the above, Mr. Heilbron and Mr. Foss are not affiliated with any issuer of securities.

Centurion Counsel does not charge or receive any performance based fees;

Disclosure of material information regarding arbitrations or disciplinary events

Centurion and its principals, Jack K. Heilbron and Steven T. Foss do not have events under this item that would require disclosure in the brochure.

Material Relationships with Issuers of Securities

As previously disclosed in Item 10, Mr. Heilbron and Mr. Foss are control persons of Presidio and NetREIT.

ITEM 11 – BUSINESS CONTINUITY PLAN

Centurion Counsel has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in

mind, we are providing you with this information on our business continuity plan.

Contacting us: If after a significant business disruption you cannot contact us as you usually do at 619-391-2383, you should go to our website at www.centurioncounsel.com. If you cannot access us through either of those means, you should contact our broker, Ceros Financial Services, at:

Phone: 866-842-3356

Direct: 240-223-1964

Fax: 301-424-3817

We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our business to function. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our brokerage firm, Ceros Financial Services, and clearing firm, National Financial Services, backs up our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our brokerage firm and clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within one day. Your requests for funds and securities could be delayed during the period.

Varying Disruptions: Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or building, we will transfer our operations to a local site when needed and expect to recover and resume business within one day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within one day. In either situation, we plan to continue in business, transfer operations to our brokerage firm if necessary, and notify you through our website (www.centurioncounsel.com) . If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customers' prompt access to their funds and securities.

For more information: If you have questions about our business continuity planning, you can contact us at our office by phone (619-391-2383) or email.

CENTURION COUNSEL, INC.
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Wrap Fee Brochure Supplement
Jack K. Heilbron

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This brochure supplement provides information about Jack K. Heilbron that supplements the Centurion Counsel, Inc. brochure. You should have received a copy of that brochure. Please contact the Operations Department at Centurion Counsel, Inc., if you did not receive the Centurion Counsel, Inc. brochure or if you have any questions about the contents of this supplement.

Additional information about Jack K. Heilbron is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 - EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Jack K. Heilbron (born 1950) graduated with a Bachelor of Science degree in Accounting from California Polytechnic University at San Luis Obispo. Mr. Heilbron has passed qualifying examinations for Investment Advisor Representative, General Securities, Registered Securities Principal, Registered Municipal Securities Principal, Registered Options Principal, Equity Trader, Investment Banking, Research Analyst, and Operations Professional.

Mr. Heilbron is a founder of CI Holding Group, Inc. and its subsidiaries, including Centurion Counsel, Inc. Mr. Heilbron currently serves as President, and Chief Investment Officer for Centurion Counsel, Inc.

Mr. Heilbron's employment history for the past 5 years is as follows:

Jan. 2013 – Present	Puppy Toes, Inc.	San Diego, CA	President
Feb. 1984 – Present	Centurion Counsel, Inc.	San Diego, CA	President/Chief Investment Officer/Director
10/2008 – Present	Presidio Property Trust	San Diego, CA	CEO
	NetREIT Dubose Model Homes, Inc.	San Diego, CA	CEO

Mr. Heilbron's background includes: Senior Auditor for the Department of Corporations, State of California, specializing in securities and syndication firms, a registered principal with a New York Stock Exchange firm and a full time due diligence officer for PIM Financial Securities, Inc. Mr. Heilbron was instrumental in the formation a Real Estate Investment Trust ("REIT") and subsequently responsible for acquisitions. In addition, Mr. Heilbron has served as a NASD Arbitrator, has been an expert witness on securities litigation, and is frequently asked to speak publicly on investments.

ITEM 3 - DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Centurion Counsel's business or Mr. Heilbron that have occurred in the previous ten (10) years that require disclosure.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Mr. Heilbron identifies the following relationships/arrangements with the related persons listed below:

- Sponsor or syndicator of limited partnerships – Mr. Heilbron is the CEO of Presidio Property Trust, Inc., a Maryland corporation that operates as a Real Estate Investment Trust, as defined under Internal Revenue Code, and NetREIT Dubose Model Homes, Inc.
- Mr. Heilbron is also the President of Puppy Toes, Inc., a California Corporation
- Other than the above, Mr. Heilbron is not affiliated with any issuer of securities.

ITEM 5 - ADDITIONAL COMPENSATION

No economic benefit, including sales awards and other prizes, is provided to Mr. Heilbron for

providing advisory services.

ITEM 6 - SUPERVISION

The Steven T. Foss, VP Operations and Chief Compliance Officer is the person responsible for monitoring advisory activities on behalf of Centurion Counsel, Inc. Mr. Foss may be reached by phone at (619)-391-2383, by email to sfoss@c1holding.com, or in writing at the Centurion Counsel office at 4995 Murphy Canyon Road, Suite 300, San Diego, CA 92123. Mr. Foss is responsible for monitoring all advisory written and electronic communications, operations and record keeping.

ITEM 7 – REQUIREMENT FOR STATE REGISTERED ADVISERS

Mr. Heilbron has not been the subject of any of the below events within the previous 10 years.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
- B. If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

**CENTURION COUNSEL, INC.
STRATEGIC ASSET ALLOCATION PROGRAM
Wrap Fee Brochure Supplement
STEVEN T. FOSS**

April 15, 2020

4995 Murphy Canyon Road
Suite 300
San Diego, CA 92123
(619) 391-2383

This brochure supplement provides information about Steven T. Foss that supplements the Centurion Counsel, Inc. brochure. You should have received a copy of that brochure. Please contact the Operations Department at Centurion Counsel, Inc., if you did not receive the Centurion Counsel, Inc. brochure or if you have any questions about the contents of this supplement.

Additional information about Steven T. Foss is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 - EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Steven Foss (born 1965) graduated with a Bachelor of Arts degrees in Economics and Business Management from North Carolina State University. Mr. Foss holds current licenses for Investment Advisor Representative, Registered Options Principal, General Securities, Registered Securities Principal, Equity Trader, Investment Banking and Operations Professional.

Mr. Foss joined Centurion Counsel, Inc. in 1993 as an assistant portfolio manager. Prior to his affiliation with Centurion, Mr. Foss was associated with PIM Financial Services, Inc. in various capacities including assistant trader, assistant compliance officer and due diligence officer.

Mr. Foss' employment history for the past 5 years is as follows:

1/2014 – Present	Ceros Financial Services, Inc.	San Diego, CA	Independent Contractor/Registered Representative
09/1993 – Present	Centurion Counsel, Inc.	San Diego, CA	VP Operations, Chief Compliance Officer
10/2008 – Present	Presidio Property Trust NetREIT Dubose Model Homes, Inc.	San Diego, CA	VP Operations, Director Client Management

ITEM 3 - DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Centurion Counsel's business, or Mr. Foss that have occurred in the previous ten (10) years that require disclosure.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Mr. Foss identifies the following relationships/arrangements with the related persons listed below:

- Broker/dealer – Mr. Foss has a relationship with Ceros Financial Services, a broker/dealer, as a registered representative.
- Sponsor or syndicator of limited partnerships – Mr. Foss serves as the Vice President of Operations and Director of Client Relations for Presidio Property Trust, Inc., a Maryland corporation that operates as a Real Estate Investment Trust, as defined under Internal Revenue Code, and NetREIT Dubose Model Homes, Inc.
- Other than the above, Mr. Heilbron is not affiliated with any issuer of securities.

Potential Conflicts of Interest – Mr. Foss does not recommend investments in Presidio Property Trust, Inc., or NetREIT Dubose Model Homes, Inc. His role is administrative (Vice President Operations and Director of Client Relations). Mr. Foss does not manage client assets within the Strategic Allocation Wrap Fee program. All account management is done by Jack K. Heilbron. His dual roles are reviewed regularly as well as annually for any potential conflicts of interest.

ITEM 5 - ADDITIONAL COMPENSATION

No economic benefit, including sales awards and other prizes, is provided to either Mr. Heilbron or Mr. Foss, for providing advisory services.

ITEM 6 - SUPERVISION

The Chief Compliance Officer is the person responsible for monitoring advisory activities on behalf of Centurion Counsel, Inc. Steven Foss is the Chief Compliance Officer ("CCO") and may be reached by phone at (619)391-2383, by email to info@centurioncounsel.com, or in writing at the Centurion Counsel office at 4995 Murphy Canyon Road, Suite 300, San Diego, CA 92123. The CCO is responsible for monitoring all advisory written and electronic communications, operations and record keeping.

ITEM 7 – REQUIREMENT FOR STATE REGISTERED ADVISERS

Mr. Foss has not been the subject of any of the below events within the past 10 years.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
- B. If the supervised person has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.