

Beacon Capital Management, Inc.

Client Brochure

This brochure provides information about the qualifications and business practices of Beacon Capital Management, Inc. If you have any questions about the contents of this brochure, please do not hesitate to contact us at (937) 439-9093 or by email at: bianchi@beaconinvesting.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 of an Investment Adviser does not imply any level of skill or training. Additional information about Beacon Capital Management is also available on the SEC's website at www.adviserinfo.sec.gov. Beacon Capital Management Inc.'s CRD number is: 120641

7777 Washington Village Drive
Suite 280
Dayton, Ohio, 45459
(937) 439-9093
www.beaconinvesting.com
bianchi@beaconinvesting.com

Version Date: 03/26/2020

ITEM 2: MATERIAL CHANGES

There are no material changes in this brochure from the last annual updating amendment on 03/21/2019 of Beacon Capital Management, Inc. Material changes relate to Beacon Capital Management, Inc.'s policies, practices or conflicts of interests.

ITEM 3: TABLE OF CONTENTS

CONTENTS

ITEM 2: MATERIAL CHANGES.....	1
ITEM 3: TABLE OF CONTENTS	2
ITEM 4: ADVISORY BUSINESS.....	5
A. Description of the Advisory Firm	5
B. Types of Advisory Service	5
i. Investment Supervisory Services	5
ii. Investment Advisory Services.....	5
a. Beacon Vantage 1.0 Portfolio Strategies	6
b. Beacon Vantage 2.0 Portfolio Strategies	6
c. Beacon Vantage 3.0 Portfolio Strategies	6
d. Beacon Vantage 3.0 American Portfolio Strategies	7
iii. Impersonal Advisory Services.....	7
iv. Separately Managed Account Advisory Services.....	7
v. Non-Discretionary Separately Managed Account Advisory Services	8
vi. Unsupervised Assets.....	8
vii. Non-Managed Accounts.....	8
viii. Pension Consulting Services.....	8
a. Investment Policy Statement Preparation (Hereinafter Referred to as “IPS”).....	8
b. Selection of Investment Vehicles	8
c. Monitoring of Investment Performance	8
d. Employee Communications	8
ix. Investment Advice through Consultation	8
x. Services Limited to Specific Types of Investments.....	8
C. Client Tailored Services and Client Imposed Restrictions.....	8
D. Wrap Fee Programs.....	9
E. Assets Under Management.....	9
ITEM 5: FEES AND COMPENSATION	9
A. Fee Schedule.....	9
i. Investment Supervisory Services Fees	9
ii. Investment Advisory Services Fees	9
iii. Impersonal Advisory Services Fees.....	9
iv. Separately Managed Account Advisory Services Fees.....	10
v. Non-Discretionary Separately Managed Account Advisory Services Fees	10
vi. Unsupervised Assets Fees.....	10
vii. Non-Managed Accounts Fees.....	10
viii. Pension Consulting Services Fees.....	10
a. On-going Monitoring Fees.....	10
b. Asset Allocation Services Fees.....	10
ix. IERISA Fee Disclosure.....	10
x. Investment Advice through Consultation Fees.....	10
B. Payment of Fees.....	10
i. Payment of Investment Supervisory Fees	10

ii. Payment of Investment Advisory Fees	10
iii. Payment of Impersonal Advisory Fees	10
iv. Payment of Separately Managed Account Advisory Fees	10
v. Payment of Non-Discretionary Separately Managed Account Advisory Fees	11
C. Clients Are Responsible for Third Party Fees	11
D. Prepayment of Fees.....	11
ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT.....	11
ITEM 7: TYPES OF CLIENTS.....	11
A. Minimum Account Size	11
ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF INVESTMENT LOSS.....	11
A. Methods of Analysis and Investment Strategies	11
i. Method of Analysis.....	11
a. Fundamental Analysis.....	11
b. Technical Analysis.....	11
ii. Investment Strategies.....	11
B. Material Risks Involved	11
i. Methods of Analysis.....	11
ii. Investment Strategies.....	11
C. Risks of Specific Securities Utilized	12
ITEM 9: DISCIPLINARY INFORMATION	12
ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	12
A. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor	12
ITEM 11: CODE OF ETHICS.....	12
A. Code of Ethics.....	12
B. Recommendations Involving Material Financial Interests	12
C. Investing Personal Money in the Same Securities as Clients	12
D. Trading Securities At/Around the Same Time as Client's Securities	12
ITEM 12: BROKERAGE PRACTICES.....	12
A. Factors Used to Select Custodians and/or Broker/Dealers	12
i. Research and Other Soft-Dollar Benefits.....	13
ii. Brokerage for Client Referrals	13
iii. Directing Which Broker/Dealer/Custodian to Use.....	13
B. Aggregating (Block) Trading for Multiple Client Accounts	13
ITEM 13: REVIEW OF ACCOUNTS.....	14
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews	14
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts	14
C. Content and Frequency of Regular Reports Provided to Clients	14
ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION	14
A. Economic Benefits Provided by Third Parties for Advice Rendered to clients (Includes Sales Awards or Other Prizes)	14
B. Compensation to Non-Advisory Personnel for client Referrals.....	14
ITEM 15: CUSTODY	14
ITEM 16: INVESTMENT DISCRETION.....	14
ITEM 17: VOTING CLIENT SECURITIES (PROXY VOTING).....	14
ITEM 18: FINANCIAL INFORMATION.....	14
A. Balance Sheet.....	14

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients15

C. Bankruptcy Petitions in the Previous Ten Years.....15

ITEM 4: ADVISORY BUSINESS

A. Description of the Advisory Firm

Beacon Capital Management, Inc. is a S-Corporation organized in the state of Ohio. This firm has been in business since July 1, 2000, and the principal owner is James Christopher Cook.

B. Types of Advisory Service

Beacon Capital Management, Inc. (hereinafter “BCM”) offers the following services to advisory clients (“Client”):

i. Investment Supervisory Services

BCM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each Client. BCM creates an Investment Management Planning Questionnaire for each Client, which outlines the Client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each Client’s specific situation. Investment Supervisory Services include, but are not limited to, the following:

- | | |
|-------------------------|------------------------------|
| • Investment strategy • | Personal investment policy |
| • Asset allocation • | Asset selection |
| • Risk tolerance • | Regular portfolio monitoring |

BCM evaluates the current investments of each Client with respect to their risk tolerance levels and time horizon. BCM will request discretionary authority via an Investment Advisory Agreement from Client in order to select securities and execute transactions without permission from the Client prior to each transaction. Risk tolerance levels are documented in the Investment Management Planning Questionnaire, which is given to each Client.

ii. Investment Advisory Services

BCM provides Investment Advisory Services to Clients who are introduced to BCM through investment advisor representatives (“Advisors”) representing Registered Investment Advisers (“Advisor Firm”) in which services are rendered to Clients by BCM and by the Advisor Firm as dictated by a “tri-party agreement” or “co-advisory agreement” executed by Client, BCM and Advisor Firm. Additionally, BCM provides Investment Advisory Services to Clients who are referred to BCM through Advisors who represent Advisor Firms, and through individuals that are registered with a Broker-Dealer (“Soliciting Firm”), known as (“Solicitors”).

Investment Advisory Services for a Client require the Advisor Firm/Solicitor Firm, through its Advisors/Solicitors to introduce and assist Clients in establishing a relationship with BCM by providing, at minimum, the following services in their entirety:

- Assist Client in understanding the services and strategies provided by BCM and why Advisor is referring BCM for investment management services.
- Periodic Client contact to answer Client inquiries, update Client information, and acquire suitability information.
- Coordinate conference calls with BCM and/or, in the case of a Plan, the Plan’s record-keeper (“Record-keeper”) where appropriate.
- Assist Client in determining the most appropriate BCM model portfolio strategy or whether an “Advisor Customized” portfolio is more appropriate for use in the Client’s managed investment account (“Client Account”). An “Advisor Customized” portfolio refers to the Advisor’s ability to create their own BCM portfolio for a given Client by selecting individual mutual funds and/or by blending different BCM model portfolio strategies for use in Client Account. In addition, the Advisor is able to determine the target allocations for each individual mutual fund and/or the blended model strategies to be used in the Client Account in order to achieve the desired investment allocation for Client.
- Deliver the BCM Form ADV 2A, ADV 2A – Appendix 1 (if applicable), and BCM’s Privacy Policy statement to the Client at the time the referral to BCM is made, and such other documents as may be required to be delivered by Advisor under federal or state law. If Advisor is referring services through a Solicitor, then the Advisor must also deliver the Solicitation Disclosure Statement as required under the Investment Advisers Act of 1940 Rule 206(4)-3. Document and archive the delivery of these documents to the Client.
- Provide adequate suitability updates for the Client to BCM when applicable. Provide appropriate model updates to BCM based upon any changes or potential changes in the Client’s investment objectives or investment restrictions.

Once the Advisor Firm/Solicitor Firm and Advisor/Solicitor have worked with Client to determine the most appropriate BCM model portfolio strategy or Advisor Customized portfolio to be used for Client Account, BCM will manage the Client Account continuously based upon the portfolio’s goals and objectives, rather than on each Client’s individual needs. All Clients have the ability to request reasonable restrictions on how their account is allocated, but BCM may not be able to accommodate all restrictions based on specific mandates of particular strategies. If BCM cannot accommodate a requested restriction, the Client will be notified and given the option to withdraw their request, or the Client can work with their Advisor/Solicitor to find an investment solution that meets the Client’s expectations. If BCM is unable to accommodate a Client’s requested restrictions, the Client will need to find another firm to help meet their financial objectives.

As BCM manages the Client Account, the Client Account’s actual stock-to-bond ratio will deviate around the target stock-to-bond ratio of the model portfolio. Although the Client Account’s target stock-to-bond ratio will be maintained, BCM may change the specific mutual funds, Exchanged Traded Funds (“ETFs”) or other investments being used in the Client Account at BCM’s discretion.

BCM will require a New Account Package from each Client that details BCM’s responsibilities to the Client, the Advisor’s responsibilities to the Client and the Client’s responsibilities to BCM. Also, via the New Account Package, Client will provide to BCM some but not exclusively the following information: basic personal and suitability information, desired investment allocation, Advisor authorization (if desired), discretionary trading authority, authorization for direct management fee deduction and acknowledgment and agreement on the

amount of management fees to be assessed to Client Account on an annual basis by BCM or by BCM and Advisor Firm.

The following are the model portfolio strategies BCM currently offers via Investment Advisory Services:

a. Beacon Vantage 1.0 Portfolio Strategies

The Beacon Vantage 1.0 Portfolio strategies utilize an asset-class diversification strategy based on the work of Eugene Fama and Kenneth French, which emphasizes small company stocks and value stocks.

Investor Objectives – The Beacon Vantage 1.0 Portfolios are for investors with a long-term perspective. Rather than attempting to “beat the market,” these portfolios are designed to capture the returns from investments that we believe have been proven with academic research to compensate investors over the long-term. Investors are willing to accept short-term underperformance to increase the probability of long-term results.

Asset Allocation – The Beacon Vantage 1.0 Portfolios are designed to take advantage of superior long-term returns which can be delivered by small company and value stocks. These portfolios tend to invest in small company and value mutual fund equity products diversified across domestic, international and emerging markets. On the fixed income side, the 1.0 Portfolios seek to apply equal weight to intermediate government and inflation protected investment products.

Risk Management – The Beacon Vantage 1.0 Portfolios utilize a risk optimization process that manages volatility with a strict “risk budget” for each portfolio. During periods when small company and value stocks have high volatility, the portfolio’s allocation is shifted to a heavier fixed income investment to stay within the “risk budget.” The same but opposite principle is applied when small company and value stocks have relatively low volatility.

The Beacon Vantage 1.0 Portfolios service typically invests in 5-12 different mutual funds purchased at Net Asset Value (“NAV”). Front-end sales loads are avoided with this service.

The minimum account size for the Beacon Vantage 1.0 Portfolio strategies is \$25,000.

b. Beacon Vantage 2.0 Portfolio Strategies

The Beacon Vantage 2.0 Portfolio strategies utilize an asset-class diversification strategy based on the work of Burton Malkiel, which states that analysts don’t have all the information necessary to predict movements in the market, that each sector of the market responds uniquely to given economic conditions, and that sectors seldom move in tandem with one another. It is this thought process that has led BCM to use sectors as the primary investment vehicle for the Vantage 2.0 Portfolio strategies.

Investor Objectives – The Beacon Vantage 2.0 Portfolios are for investors seeking more consistent results. These portfolios are designed to avoid significant losses while attempting to generate consistent returns. Investors are willing to sacrifice the highest possible returns in the market for a higher level of risk control.

Asset Allocation – The Beacon Vantage 2.0 Portfolios are highly diversified across all market sectors and are constructed using three primary portfolios comprised of stocks, bonds and cash. For stocks, these portfolios are diversified across 11 different market sectors. Rather than attempt to predict which sector, such as technology, health care or energy, is going to be in favor, these portfolios invest in all sectors equally. BCM applies this same equal-weighting approach to our bond portfolio which consists of Long-Term, Intermediate-Term and Short-Term fixed income holdings. A cash position is maintained for each Vantage 2.0 Portfolio and the amount of that cash position can range from one to five percent depending on the risk tolerance selected.

Risk Management – The Beacon Vantage 2.0 Portfolios utilize a stop-loss strategy that automatically withdraws investors from their equity positions if the investment loss of the Vantage 2.0 Benchmark Index hits a predetermined amount. This approach attempts to provide a safety valve during extreme bear markets when standard asset allocation diversification may not be enough to protect an investor’s principle.

The Beacon Vantage 2.0 Portfolio strategies typically invest in 11-15 different exchange-traded funds (ETFs). There are no sales loads with this service.

The minimum account size for the Beacon Vantage 2.0 Portfolio strategies is \$25,000.

c. Beacon Vantage 3.0 Portfolio Strategies

The Beacon Vantage 3.0 Portfolio strategies utilize an asset-class diversification strategy based on the work of Burton Malkiel, which states that analysts don’t have all the information necessary to predict movements in the market, that each sector of the market responds uniquely to given economic conditions, and that sectors seldom move in tandem with one another. It is this thought process that has led BCM to use sectors as the primary investment vehicle for the Vantage 3.0 Portfolio strategies.

Investor Objectives – The Beacon Vantage 3.0 Portfolios are for investors seeking more consistent results. These portfolios are designed to avoid significant losses while attempting to generate consistent returns. Investors are willing to sacrifice the highest possible returns in the market for a higher level of risk control.

Asset Allocation – The Beacon Vantage 3.0 Portfolios are highly diversified across all market sectors and are constructed using three primary portfolios comprised of, stocks, bonds and cash. For stocks, these portfolios are diversified across 11 different market sectors. Rather than attempt to predict which sector, such as technology, health care or energy, is going to be in favor,

these portfolios invest in all sectors equally. BCM applies this same equal-weighting approach to our bond portfolio which consists of Extended Duration, Long-Term, Intermediate-Term, Inflation Protected and Short-term fixed income holdings. A cash position is maintained for each Vantage 3.0 Portfolio and the amount of that cash position can range from one to five percent depending on the risk tolerance selected. In addition to BCM's normal Aggressive, Balanced and Conservative models which are offered for all model portfolio strategies, the Vantage 3.0 investment lineup also offers an Alternative and Bond model. The Alternative model seeks equal investment across Currencies, Commodities and Private Equity investment products. The Bond model consists of just the Extended Duration, Long-Term, Intermediate-Term, Inflation Protected and Short-term fixed income holdings. The Bond model never invests in stocks and the holdings also target an equal weight.

Risk Management – The Vantage 3.0 Portfolios offer broad diversification with proprietary targeted loss reduction protections at the sector/holding level. Each holding within a Vantage 3.0 portfolio is able to move independently and is designed to mechanically step in and out of the market as pre-determined data points signal it is necessary to protect from potential drastic losses while still seeking to participate in market opportunities.

The Beacon Vantage 3.0 Portfolio strategies typically invest in 5-19 different exchange-traded funds (ETFs). There are no sales loads with this service.

The minimum account size for the Beacon Vantage 3.0 Portfolio strategies is \$25,000.

d. Beacon Vantage 3.0 American Portfolio Strategies

The Beacon Vantage 3.0 American Portfolio strategies utilize a tactical asset-allocation investment methodology built in collaboration with American Funds' Capital Markets Team. With the Vantage 3.0 American Portfolios, BCM has created an option that substitutes our normal first line of defense, equal allocation, for access to the investment committees of American Funds that back and proactively manage each of their mutual funds. This allows the portfolios to be more highly correlated with, and achieve performance more in line with, general markets, which are often measured by indexes like the Dow Jones Industrial Average and the S&P 500. Our Vantage 3.0 American Portfolios are not only comprised of highly respected American Funds mutual fund products, but they also implement a layer of risk management for investors through the Vantage 3.0 strategies' loss-reduction mechanics.

Investor Objectives – The Beacon Vantage 3.0 American U.S. and International Portfolios are for investors seeking returns that more closely track the performance of large capitalization domestic and developed market indexes, while Bond Portfolio investors are seeking returns more highly correlated with global fixed income markets, but that also understand and are willing to sacrifice the highest possible returns in exchange for downside risk management protections.

Asset Allocation – At the fund level, the Vantage 3.0 American Portfolios seek to benefit from the collective knowledge of American Fund's investment committees. Offered exclusively to investors through financial advisors since 1931, American Funds, is often recognized for delivering superior long-term results through a robust global research and analysis process that screens for low expenses and high manager ownership. The Vantage 3.0 American Portfolios' normal target allocations were established, in part, based upon the recommendations of, and in collaboration with, the American Funds' Capital Markets Team. These allocations were assigned in order to achieve the optimal blend of diversification while adhering to the portfolios' investment philosophy and objectives.

Risk Management - The Vantage 3.0 American Portfolios offer broad diversification with proprietary targeted loss reduction protections at the holding level. Each holding within a Vantage 3.0 American portfolio is able to move independently and is designed to mechanically step in and out of the market as pre-determined data points signal it is necessary to protect from potential drastic losses while still seeking to participate in market opportunities.

The Beacon Vantage 3.0 Portfolio strategies typically invest in 1-5 different American Funds mutual fund products at any given time that are diversified across domestic, international and world equity holdings in addition to domestic and international bond investments. There are no sales loads with this service.

The minimum account size for the Beacon Vantage 3.0 American Portfolio strategies is \$5,000.

iii. Impersonal Advisory Services

BCM provides investment advisory services while acting as a sub-advisor to various Registered Investment Advisers programs.

The services BCM provides sub-advisory managed accounts is as follows: portfolio design, asset allocation, risk management and security selection. Sub-advisory managed accounts are managed based upon the selected portfolio's stated investment strategy, philosophy and objective, rather than on each Client's individual needs.

iv. Separately Managed Account Advisory Services

BCM provides investment advisory services on a discretionary basis for Unified Managed Accounts ("UMAs") and Separately Managed Accounts ("SMAs"). BCM may provide one or more of its model portfolio strategies to a "Platform Provider" such as Envestnet, Lockwood Advisors, Trust Company of America, Adhesion Wealth Advisor Solutions and Wells Fargo in which BCM has entered into an agreement as a model manager with the Platform Provider. BCM provides access to some or all of our model portfolio strategies via the Platform Provider's model management system for which Advisors and Clients can then select for use in a Client Account. For UMA/SMA managed accounts, BCM is solely responsible for the management of the model portfolio strategies provided to the Platform Provider which have been selected for use in a Client Account by Advisor and/or Client. By utilizing one or more of BCM's model portfolio strategies via a Platform Provider, the services BCM provides UMA/SMA managed accounts is as follows, portfolio design, asset allocation, risk

management and security selection. UMA/SMA's accounts are managed based upon the selected portfolio's stated investment strategy, philosophy and objective, rather than on each Client's individual needs.

v. Non-Discretionary Separately Managed Account Advisory Services

BCM provides investment advisory services on a non-discretionary basis for Non-Discretionary Separately Managed Accounts ("ND-SMA's"). BCM may provide model allocations and risk management information pertaining to one or more of its model portfolio strategies to a "Service Platform Provider" such as TradePMR. Under this type of agreement, BCM is to provide the model portfolio's target allocations and risk management triggers to the Service Platform Provider. Unlike BCM's discretionary SMA services, for ND-SMA managed accounts, BCM does not, itself, maintain and manage the model portfolios. BCM is solely responsible for updating the Service Platform Provider with any changes made to a model portfolio's target asset allocation and with any tactical risk management rebalancing trigger points. It is the sole responsibility of the Service Platform Provider to update the model portfolio's allocations appropriately and timely, and to process appropriately and timely any risk management rebalancing trades based upon the information provided to the Service Platform Provider by BCM.

vi. Unsupervised Assets

From time to time, Clients may have pre-existing investments that they do not want actively managed by BCM. These Clients may request that BCM incorporate these holdings into a single account to facilitate future management and reporting. BCM will initially consolidate these unsupervised assets into a single Client Account within the Client's existing portfolio. These assets will not be actively managed by BCM although they will be incorporated into the Client's quarterly summary reports prepared by BCM.

vii. Non-Managed Accounts

From time to time, Clients may establish non-discretionary, non-managed accounts for which BCM maintains under our firm as a courtesy to the Client. Non-discretionary, non-managed accounts are not charged a management fee by BCM and/or Advisor Firm/Solicitor nor are any investment advisory services provided.

viii. Pension Consulting Services

BCM provides several advisory services separately or in combination. While the primary clients for these services will be pension, profit sharing and 401(k) plans, BCM will also offer these services, where appropriate, to individuals and trusts, estates and charitable organizations. Pension Consulting Services are comprised of four distinct services. Clients may choose to use any or all of these services.

a. Investment Policy Statement Preparation (Hereinafter Referred to as "IPS")

BCM will meet with the Client (in person or over the telephone) to determine the Client's investment needs and goals. BCM will then prepare a written IPS stating those needs and goals and encompassing a policy under which these goals are to be achieved. The IPS will also list the criteria for selection of investment vehicles and the procedures and timing interval for monitoring of investment performance.

b. Selection of Investment Vehicles

BCM will review various investments, consisting exclusively of mutual funds (both index and managed) to determine which of these investments are appropriate to implement the Client's IPS. The number of investments to be recommended will be determined by the Client, based on the Investment Policy Statement.

c. Monitoring of Investment Performance

Client investments will be monitored continuously based on the procedures and timing intervals delineated in the Investment Policy Statement. Although BCM will not be involved in any way in the purchase or sale of these investments, BCM will supervise the Client's portfolio and will make recommendations to the Client as market factors and the Client's needs dictate.

d. Employee Communications

For pension, profit sharing and 401(k) plan clients wherein there are individual accounts with participants exercising control over assets in their own account ("self-directed plans"), BCM also provides quarterly educational support and investment workshops designed for the Plan participants. The nature of the topics to be covered will be determined by BCM and the Client under the guidelines established in ERISA Section 404(c). The educational support and investment workshops will NOT provide Plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

ix. Investment Advice through Consultation

BCM may offer investment research, economic analysis and portfolio design based on our model allocations. Allocations are based on risk tolerance and stock-to-bond ratios. These services are available to other persons or entities for a negotiable fee.

x. Services Limited to Specific Types of Investments

BCM limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, third party money managers, REITs, insurance products including annuities, and government securities. BCM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

BCM offers the same suite of services to all of its Clients within the same type of Advisory Service. When applicable, specific Client financial plans and their implementation are dependent upon the Client Investment Management Planning Questionnaire which outlines each Client's current situation (income, tax levels, and risk tolerance levels) or the information obtained by BCM from the Client via the Advisor/Solicitor, both of which can be used to construct a Client specific plan to aid in the selection of a portfolio that matches its restrictions, needs, and targets.

D. Wrap Fee Programs

BCM participates in wrap fee programs, which is an investment program where the investor pays one stated fee that includes management fees and transaction costs from the custodian. BCM does manage the investments in the wrap fee program. BCM does not manage those wrap fee accounts any differently than non-wrap fee accounts. A portion of the fees paid to the wrap account program will be given to BCM as a management fee.

E. Assets Under Management

BCM has the following assets under management:

Discretionary Assets	Non-discretionary Amounts	Date Calculated
\$3,070,133,956	\$7,621,084	December 2019

ITEM 5: FEES AND COMPENSATION**A. Fee Schedule****i. Investment Supervisory Services Fees**

Fees are negotiated and established on a Client by Client basis, but these negotiated fees cannot exceed 1.8% annually or \$400 minimum per year. All Investment Supervisory fees are disclosed and documented via the Client's Investment Advisory Agreement. The Client may also pay fees and expenses related to the Client's investments in the underlying mutual funds, ETFs or other investment vehicles used within their account. A description of these fees and expenses can be found in each funds' prospectus.

ii. Investment Advisory Services Fees

For its investment advisory services, Client agrees to pay BCM a Beacon Management Fee to be charged directly to Client's Account as described below:

Average Daily Value of Client Account	Annual Fee %
\$0-\$499,999.99	0.55%
\$500,000-\$999,999.99	0.35%
\$1,000,000+	0.15%
Minimum Annual Fee Charge	\$400.00*

*Average Daily Values of Client Accounts under \$72,728 will be charged more than 0.55% annually because of the \$400.00 minimum annual fee.

For Client Accounts managed under a tri-party agreement, an additional Advisor Fee is added on top of the above disclosed Beacon Management Fee. The amount of the Advisor Fee is disclosed to each Client via the Client's Investment Management Agreement. Under the tri-party agreement, the Beacon Management Fee is owed by the Client to BCM directly, and the Advisor Fee is owed by the Client to the Advisor Firm directly. The summation of the Beacon Management Fee and the Advisor Fee should be viewed as the total amount of management fees being charged for the management of a BCM Client Account. Lastly, services similar to those offered by BCM may be available elsewhere for more or less than the amount BCM charges for investment advisory services rendered to Clients, including those managed under a tri-party agreement.

For Client Accounts managed under a soliciting relationship, an additional Solicitor Fee is added on top of the above disclosed Beacon Management Fee. The amount of the Solicitor Fee is disclosed to each Client via the Client's Investment Management Agreement and Solicitation Disclosure Statement. The total amount charged to a Client who is referred to BCM via a Solicitor will not exceed 1.8% annually or \$400 minimum per year. The combined fee (the Beacon Management Fee and the Solicitor Fee) is collected in full by BCM. Then a portion of the total management fee collected by BCM is paid out to Solicitor as a referral fee.

It should also be noted that some Clients may be charged a Beacon Management Fee less than BCM's standard Investment Advisory Services Fee Schedule, that begins at 0.55% annually, based upon the relationship BCM has with the Solicitor or Advisor. Lastly, services similar to those offered by BCM may be available elsewhere for more or less than the amount BCM charges for investment advisory services rendered to Clients, including those managed under a soliciting relationship agreement.

It should be noted that both the Beacon Management Fee and the Solicitor/Advisor Fee are negotiable and the final fee amounts are disclosed in detail to each Client via the Client's Investment Management Agreement.

Fees are paid monthly or quarterly in advance or in arrears depending upon Client situation, and Clients may terminate their contracts with ten days' written notice. For fees charged in arrears, no refund policy is necessary as fees are charged for the specific number of days that the assets were under BCM's management. For fees charged in advance, refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Clients may terminate their contracts without penalty, for full refund, within five business days of signing the advisory contract. Advisory fees are withdrawn directly from the Client's Accounts with Client written authorization. The Client may also pay fees and expenses related to the client's investments in the underlying mutual funds, ETFs or other investment vehicles used within their account. A description of these fees and expenses can be found in each fund's prospectus.

iii. Impersonal Advisory Services Fees

Fees are negotiated with each individual Advisor Firm for which BCM has entered into a sub-advisory relationship with. For impersonal advisory managed accounts, fees can be as high as 0.55% or \$400 minimum per year. The Client may also pay fees and expenses related to the Client's investments in the underlying mutual funds, ETFs or other investment vehicles used within their account. A description of these fees and expenses can be found in each funds' prospectus. Note the Client may pay additional management fees above and beyond

BCM's fee for which BCM has no control over nor receives any benefit from.

iv. Separately Managed Account Advisory Services Fees

Fees are negotiated with the Platform Provider. Separately Managed Account (SMA) fees can be as high as .55% or \$400 minimum per year. The Client may also pay fees and expenses related to the Client's investments in the underlying mutual funds, ETFs or other investment vehicles used within their account. A description of these fees and expenses can be found in each funds' prospectus. Note the Client may pay additional management fees to their primary adviser that are above and beyond BCM's fee for which BCM has control over nor receives any benefit from.

v. Non-discretionary Separately Managed Account Advisory Services Fees

Fees are negotiated with the Service Platform Provider. Separately Managed Account (SMA) fees can be as high as .55% or \$400 minimum per year. The Client may also pay fees and expenses related to the Client's investments in the underlying mutual funds, ETFs or other investment vehicles used within their account. A description of these fees and expenses can be found in each funds' prospectus. Note the Client may pay additional management fees to their primary adviser that are above beyond BCM's fee for which BCM has control over nor receives any benefit from.

vi. Unsupervised Assets Fees

For these assets, BCM will typically charge a minimal administrative fee of 0.10% annually. However, once these unsupervised assets are sold, they will be reclassified as managed assets and fees will be charged in accordance with the applicable BCM advisory service rendered and as agreed upon via the Client's Advisory Agreement or Investment Management Agreement.

vii. Non-Managed Accounts Fees

Non-discretionary, non-managed accounts are not charged any management fees.

viii. Pension Consulting Services Fees

BCM offers the following fee options for Clients receiving only Pension Consulting services and for Clients receiving Pension Consulting services combined with Asset Allocation services:

- a. For Pension Consulting Services that include on-going monitoring, the annual fee may range from 0.10% to 1.00% of plan assets under advisement, depending upon the services requested and the size of the plan.
- b. For Pension Consulting Services that include Asset Allocation Services, the annual fee may range from 0.85% to 1.80% of plan assets under management, depending on the services requested and the size of the plan. BCM will quote an exact percentage to each Client based on both the nature and total dollar value of that account. The billing terms and fees will be stipulated in the Investment Management Client Agreement.

ix. ERISA Fee Disclosure

BCM is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, BCM is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, BCM may only charge fees for investment advice about products for which BCM and/or its related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which BCM and/or its related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset BCM's advisory fees.

x. Investment Advice through Consultation Fees

Fees typically start at 55 basis points (0.55%) but may be higher or lower depending on levels of assets under management.

B. Payment of Fees

i. Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the Client's Account with Client written authorization. Fees are paid monthly or quarterly in advance or in arrears, as directed by the individual contract with each client.

Advisory fees are also invoiced and billed directly to the Client monthly or quarterly in advance or in arrears. Payments are due upon receipt of invoice. Clients may select the method in which they are billed.

ii. Payment of Investment Advisory Fees

Advisory fees are withdrawn directly from the Client's Account with Client written authorization. Fees are paid monthly or quarterly in advance or in arrears.

Advisory fees are also invoiced and billed directly to the Client monthly or quarterly in advance or in arrears. Payments are due upon receipt of invoice. Clients may select the method in which they are billed.

iii. Payment of Impersonal Advisory Fees

Advisory fees are paid to BCM from the Advisor Firm for which BCM has entered into the sub-advisory relationship with as agreed upon via the sub-advisory contract entered into by both parties.

iv. Payment of Separately Managed Account Advisory Fees

Advisory fees are paid to BCM by the Platform Provider as agreed upon via the agreement entered into by BCM and the Platform Provider.

v. Payment of Non-discretionary Separately Managed Account Advisory Fees

Advisory fees are paid to BCM by the Service Platform Provider as agreed upon via the agreement entered into by BCM and the Service Platform Provider.

C. Clients Are Responsible for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by BCM. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

BCM collects fees in advance and in arrears. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the Client via check or return to credit card.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

BCM does not accept performance-based fees or other fees based on a share of capital gains or capital appreciation of the assets of a Client.

ITEM 7: TYPES OF CLIENTS

BCM generally provides investment supervisory, investment advisory and separately managed account advisory services to the following Types of Clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit-Sharing Plans
- Corporations or Business Entities

A. Minimum Account Size

BCM requires a minimum account of \$25,000 for the Beacon Vantage 1.0 Portfolio, Beacon Vantage 2.0 Portfolio and the Beacon Vantage 3.0 Portfolio strategies. BCM requires a minimum account of \$5,000 for the Beacon Vantage 3.0 American Portfolio strategies. These minimum account requirements may be negotiable at BCM's discretion based on the Client's individual circumstances. BCM may group certain related Client Accounts for the purposes of achieving the minimum account size. Account minimums for SMA services are determined by the Platform Provider (or Service Platform Provider) and/or the Advisor/Advisor Firm of record.

There is no account or net worth minimums for Pension Consulting Services Clients.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF INVESTMENT LOSS

A. Methods of Analysis and Investment Strategies

i. Methods of Analysis

BCM's methods of analysis include fundamental analysis and technical analysis.

a. Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages

b. Technical analysis involves the analysis of past market data, primarily price and volume.

ii. Investment Strategies

BCM uses Long Term and Short-Term Trading strategies

Investing in securities involves a risk of loss that you, as a Client, should be prepared to bear.

B. Material Risks Involved

i. Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends and/or historical analysis. The assumption is that the market follows discernible patterns, and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns, and relying solely on this method may not work long term.

ii. Investment Strategies

Long Term Trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short Term Trading generally holds greater risk and Clients should be aware that there is a chance of material risk of loss using any of

those strategies.

Investing in securities involves a risk of loss that you, as a Client, should be prepared to bear.

C. Risks of Specific Securities Utilized

BCM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a Client, should be prepared to bear.

ITEM 9: DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a Client's or prospective Client's evaluation of this advisory business or the integrity of our management.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither BCM nor its representatives are registered as a FCM, CPO, or CTA.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Code of Ethics

BCM maintains a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions (Initial Public Offerings and Limited or Private Offerings), Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Personal Securities Transactions Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any Client or prospective Client.

BCM's Clients or prospective Clients may request a copy of its Code of Ethics by calling (937) 439 – 9093 or writing to Beacon Capital Management at 7777 Washington Village Drive, Suite 280, Dayton, Ohio 45459.

B. Recommendations Involving Material Financial Interests

BCM does not recommend that Clients buy or sell any security in which a related person to BCM has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of BCM may buy or sell securities for themselves that they also recommend to Clients. This may provide an opportunity for representatives of BCM to buy or sell the same securities before or after recommending the same securities to Clients resulting in representatives profiting off the recommendations they provide to Clients. Such transactions may create a conflict of interest. BCM will always document any transactions that could be construed as conflicts of interest and will always transact Client business before or simultaneously with their own when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of BCM may buy or sell securities for themselves at or around the same time as Clients. This may provide an opportunity for representatives of BCM to buy or sell securities before or after recommending securities to Clients resulting in representatives profiting off the recommendations they provide to Clients. Such transactions may create a conflict of interest. BCM representatives will always transact Client transactions simultaneously with, or before their own.

ITEM 12: BROKERAGE PRACTICES

A. Factors Used to Select Custodians and/or Broker/Dealers

For Clients in need of brokerage or custodial services, and depending on Client circumstances and needs, BCM may recommend the use of one of several broker dealers, provided BCM can meet its fiduciary obligation of best execution. BCM Clients must evaluate these brokers before opening an account. The factors considered by BCM when making this recommendation are the broker's ability to provide professional services, BCM's experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, among other factors. Clients are not under any obligation to effect trades through any recommended broker.

BCM participates in the following custodial programs which it may recommend to Clients: the Schwab Advisor Services program offered to independent investment advisers by, Charles Schwab & Company, Inc. ('Schwab'), the TD Ameritrade Institutional program, a division of TD Ameritrade, Inc. ('TD Ameritrade'), member FINRA/SIPC, and the Advisor Products program provided by First Clearing, LLC ("FCC") sponsored by Wells Fargo Advisors. Schwab, TD Ameritrade, and FCC are SEC registered broker dealers. Schwab, TD Ameritrade and FCC are not affiliated with BCM. As part of these programs, BCM receives benefits that it would not receive if it did not offer investment advice. Note there is no direct link between BCM's participation in the custodial program and the investment advice given to Clients.

Schwab, TD Ameritrade and FCC offer services to independently Registered Investment Advisers which include custody of securities, trade execution and clearance and settlement of transactions. BCM receives some benefits from Schwab, TD Ameritrade and FCC through its participation in the custodian's program.

Clients directing us to manage accounts with a specific broker-dealer and their affiliated custodian, including those recommended by us, have the sole responsibility for negotiating commission rates and other transaction costs with the broker-dealer and/or custodian. Clients may be able to obtain lower transaction fees and/or charges with broker-dealers and custodians other than those selected by us.

Broker dealers are required to supervise the securities trading activities of its representatives. Clients may request that brokerage transactions be directed to a particular broker or dealer. However, if BCM believes that the use of the Client's selected broker dealer would hinder the firm meeting its supervisory obligations, BCM will not be able to accept the account. Furthermore, if BCM believes that the use of that broker dealer would hinder BCM in meeting its fiduciary obligations, BCM will not be able to accept the account.

i. Research and Other Soft-Dollar Benefits

BCM and/or associated persons may, from time to time, receive incentive awards for the recommendation/introduction of insurance products. The receipt of this compensation may affect BCM's judgment in recommending products to its Clients. Schwab, TD Ameritrade and FCC also make available to BCM other products and services that benefit BCM but may not benefit its Clients' accounts.

Some of these other products and services assist BCM in managing and administering Clients' Accounts. These include; software and other technologies that provide access to Client Account data (such as trade confirmations and account statements), facilitating trade execution (and allocation of aggregated trade orders for multiple Client Accounts), access to funds with no transaction fees and to certain institutional money managers, facilitating payment of BCM's fees from its Clients' Accounts, providing research products and tools, pricing information and other market data, discounts on compliance, marketing, research, technology, practice management products or services provided to BCM by third party vendors, and assisting with back-office functions, customer relationship management, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of BCM's accounts. Recommended brokers also make available to BCM other services intended to help BCM manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

BCM does not, however, enter into any commitments with the brokers for transaction levels in exchange for any services or products from brokers. While as a fiduciary, BCM endeavors to act in its Clients' best interests, BCM's requirement that Clients maintain their assets in accounts at Schwab, TD Ameritrade or FCC may be based in part on the benefit to BCM of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the brokers, which may create a potential conflict of interest.

By receiving some of the additional products and services described above, BCM may receive certain additional economic benefits which may or may not be offered to other independent advisors that also participate in the Schwab, TD Ameritrade and FCC service programs. BCM's receipt of additional products and services does not diminish BCM's duty to act in the best interest of our Clients, including seeking best execution of trades for Client Accounts.

Through its participation in the TD Ameritrade program, BCM also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent Investment Advisors participating in the TD Ameritrade program. Specifically, the Additional Services include compensation for the consultation for and customization of Salesforce a client contact management system. TD Ameritrade provides the Additional Services to BCM in its sole discretion and at its own expense, and BCM does not pay any fees to TD Ameritrade for the Additional Services. BCM and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the Additional Services provision. BCM's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to BCM, TD Ameritrade likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, BCM's Client Accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with BCM, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, BCM may have an incentive to recommend to its Clients that the assets under management by BCM be held in custody with TD Ameritrade and to place transactions for Client Accounts with TD Ameritrade. BCM's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including seeking best execution of trades for Client Accounts.

ii. Brokerage for Client Referrals

BCM receives no referrals from a Broker-Dealer or a third -party in exchange for using that Broker-Dealer or third party.

iii. Directing Which Broker/Dealer/Custodian to Use

BCM allows Clients to direct brokerage. Clients may direct brokerage based on advice and recommendations made by the Sub-Manager, Co-Advisor or Solicitor that has referred the Client to BCM. BCM may be unable to achieve most favorable execution of Client transactions if Clients choose to direct brokerage. This may cost Clients' money because without the ability to direct brokerage BCM may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices. Not all investment advisers allow their Clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

BCM at its discretion may determine that the use of block transactions when effecting Firmwide Risk Management trades ("FRM" trades), could yield best execution results for investors. The practice of block trading may allow BCM to obtain more favorable execution, including more favorable pricing, than would otherwise be available if orders were not aggregated. Using block transactions may also assist BCM in potentially avoiding an adverse effect on the price of a security that could result from simultaneously placing a number of separate successive or competing client orders. BCM may also determine that when processing FRM trades that submitting competitive risk block orders or having block orders traded throughout the day, may also produce more favorable execution fills for our investors.

Presently, “Routine Trades,” which we define as trading that results from normal rebalancing, new accounts, liquidations, cash/security addition or withdrawals, tax harvesting, or any other client-requested transactions, are typically executed as market block orders when the potential for blocking orders presents itself, but may otherwise generate orders that are executed directly in an end investor’s account.

C. ITEM 13: REVIEW OF ACCOUNTS

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed on a regular basis by James Christopher Cook, Brandon Bianchi or other persons delegated to perform such tasks. They are the chief advisors and are instructed to review Clients’ Accounts with regards to their investment advisory program, investment policies and risk tolerance levels.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in Client’s financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Clients engaged in investment supervisory and investment advisory services will receive at least quarterly a quarterly performance evaluation report from BCM detailing the Client’s Account. Each Client will also receive a monthly statement from their custodian detailing their Client Account.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

BCM may receive some economic benefit from our custodians in the form of support products and services it makes available to us and other independent investment advisors that have their Client Accounts maintained at TD Ameritrade, Schwab or FCC. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of products and services offered by TD Ameritrade, Schwab or FCC is not based on us giving particular investment advice, such as buying particular securities for our Clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

BCM enters into soliciting arrangements with Registered Investment Advisers, an affiliated Broker-Dealer of a Registered Investment Adviser, or a Broker-Dealer (“Solicitors”) pursuant to which the representatives of their firms (“Advisors”) offer our services to the public. Through these arrangements, BCM may pay a cash referral fee to the Solicitor and/or a Soliciting Advisor based upon a percentage of our investment management fee. The amount of the referral fee is disclosed to Client via the Client’s Investment Management Agreement and Solicitation Disclosure Statement. In connection with these arrangements, BCM will comply with Rule 206(4)-3 under the Advisers Act.

The referral fee is paid pursuant to a written agreement, which is retained by the Solicitor, the Soliciting Advisor, and BCM. This information is disclosed to you prior to or at the time of entering into an Investment Management Agreement with BCM. Solicitors, on their own and not related in any way to their solicitors’ agreements with BCM and not on BCM’s recommendation, may also sell insurance, annuities, mutual funds, stocks, bonds, and/or limited partnerships to Clients. These Solicitors may receive separate and typical commissions on the sale of these products. BCM may pay a portion of the investment management fee to other affiliated or non-affiliated parties who assist with certain administrative tasks associated with the management of your Client Account.

ITEM 15: CUSTODY

BCM does not take custody of Client Account at any time. Custody of a Client Account is held primarily at the custodians: Schwab, TD Ameritrade and FCC. If the Client chooses to be billed directly by the custodian, BCM would have constructive custody over that account and must have written authorization from the Client to do so. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

ITEM 16: INVESTMENT DISCRETION

For those Client Accounts where BCM provides ongoing investment supervisory, investment advisory and separately managed account advisory services, the Client has given BCM written discretionary authority over the Client Account with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the Client before any advisory relationship has commenced. The Client provides BCM discretionary authority via a limited power of attorney via their Investment Advisory Contract or Investment Management Agreement and in the contract between the Client and the custodian.

ITEM 17: VOTING CLIENT SECURITIES (PROXY VOTING)

BCM will not ask for nor accept voting authority for Client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

ITEM 18: FINANCIAL INFORMATION

A. Balance Sheet

BCM does not require nor solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither BCM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to Clients.

C. Bankruptcy Petitions in Previous Ten Years

BCM has not been the subject of a bankruptcy petition in the last ten years.