

Item 1: Cover Page



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Wrap Fee Program Brochure
Part 2A – Appendix 1 of Form ADV
Updated: August 22, 2022

This wrap fee 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 (515) 221-4879 or by email at: edamman@sfgmembers.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.

Item 2: Material Changes

The material changes in this brochure from the last annual Wrap Fee Program Brochure updating amendment filed by Beacon Capital Management, Inc. on 03/24/2021 as it relates to Beacon Capital Management, Inc.'s policies, practices or conflicts of interest are stated below.

- Emily Damman has replaced Brett Lee Agnew as the Chief Compliance Officer of Beacon Capital Management, Inc.
- Beacon Capital Management, Inc. no longer offers Pension Consulting services. (Item 5)

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Item 4: Services, Fees and Compensation

A. Describe the services, including the types of portfolio management services, provided under each program. Indicate the wrap fee charged for each program or, if fees vary according to a schedule, provide your fee schedule. Indicate whether fees are negotiable and identify the portion of the total fee, or the range of fees, paid to portfolio managers.

Beacon Capital Management (hereinafter “Beacon”) offers wrap fee program services to its Investment Supervisory and Investment Advisory Services clients that will utilize TD Ameritrade as their custodian. Beacon participates in a wrap fee program, which is an investment program where the investor pays one stated fee that includes management fees and transaction costs from the custodian. Beacon does manage the investments in the wrap fee program. Beacon 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 Beacon as a management fee.

Beacon offers the following wrap investment services to advisory clients (“Client”):

1. Investment Supervisory Services

Beacon offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Beacon 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

Beacon evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Beacon 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.

2. Investment Advisory Services

Beacon provides Investment Advisory Services to clients who are introduced to Beacon through investment advisor representatives who represent registered investment advisors and broker dealers (“Firm”).

Investment Advisory Services for a client require the Firm, through its representatives, to introduce and assist clients in establishing a relationship with Beacon. The Firm maintains

responsibility for assisting the client in understanding and determining the most appropriate services and strategies provided by Beacon; communicating with clients to answer client inquiries, update client information, and acquire suitability information; providing documents, including Beacon's ADV, to clients as required under federal or state law and regulation; and provide suitability and model updates to Beacon as necessary.

Once the Firm and its representatives have worked with client to determine the most appropriate portfolio strategy to be used for the client account, Beacon will manage the client account continuously based upon the strategy's goals and objectives.

As Beacon 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, Beacon may change the specific mutual funds, Exchanged Traded Funds ("ETFs") or other investments being used in the client account at Beacon's discretion.

Beacon provides four model portfolios, each of which has conservative, balanced, and aggressive strategies within it. The descriptions of the model portfolios below are not meant to be comprehensive, but rather provide a brief overview of Beacon's strategies.

a. Beacon Vantage 1.0 Portfolio Strategies

The Beacon Vantage 1.0 Portfolio strategies utilize an asset-class diversification strategy emphasizing small company stocks 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.

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 typically \$25,000.

b. Beacon Vantage 2.0 Portfolio Strategies

The Beacon Vantage 2.0 Portfolio strategies utilize an asset-class diversification strategy, using ETFs focused on distinct sectors as the primary investment vehicle. The Beacon Vantage 2.0 Portfolios are highly diversified across all domestic 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 the sectors equally. Beacon applies this same equal-weighting approach

to its 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.

The Beacon Vantage 2.0 Portfolios utilize a stop-loss strategy that automatically withdraws clients 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 market decreases when standard asset allocation diversification may not be enough to protect a client's investment.

After a stop-loss is triggered, Beacon monitors the portfolio using quantitative metrics to determine when to repurchase equities.

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 typically \$25,000.

c. Beacon Vantage 3.0 Portfolio Strategies

As with the Beacon Vantage 2.0 Portfolio strategies, Beacon Vantage 3.0 Portfolio strategies utilize an asset-class diversification strategy, with the portfolio's stocks equally invested in 11 market sectors and the bond portfolio consisting 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.

In addition to Beacon's normal Aggressive, Balanced and Conservative allocations which are offered for all model portfolio strategies, the Vantage 3.0 investment lineup also offers Alternative and Bond models. The Alternative model seeks equal investment across Currencies, Commodities and Private Equity investment products. The Bond model targets an equal weight of the Extended Duration, Long-Term, Intermediate-Term, and Inflation Protected ETFs. The Bond model does not invest in stocks.

The Vantage 3.0 Portfolios offer broad diversification with proprietary targeted loss reduction protections at the sector/holding level. Each sector within a Vantage 3.0 portfolio moves independently and is designed to quantitatively buy in and sell out of markets as pre-determined data points signal it is necessary to protect from potential drastic losses and seeking to participate in market opportunities. After a stop-loss is triggered, Beacon monitors the portfolio using quantitative metrics to determine when to repurchase equities.

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 typically \$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, Beacon has created an option that substitutes its 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. The Vantage 3.0 American Portfolios are comprised of American Funds mutual fund products and implement a layer of risk management for clients through the Vantage 3.0 strategies’ loss-reduction mechanics.

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 quantitatively buy in and sell out of markets as pre-determined data points signal it is necessary to protect from potential drastic losses and seeking to participate in market opportunities. After a stop-loss is triggered, Beacon monitors the portfolio using quantitative metrics to determine when to repurchase equities.

The Beacon Vantage 3.0 American 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 typically \$5,000.

As of December 2021

Total Wrap Assets Under Management	Maximum Annual Fee (including wrapped fees)	Maximum Annual Fee to Beacon (excluding wrapped fees)
\$2,974,569,393	1.80% for Investment Supervisory Services .55% for Investment Advisory Services	1.80% for Investment Supervisory Services .55% for Investment Advisory Services

There is a minimum annual fee of \$400 charged by Beacon for both Investment Supervisory and Investment Advisory services. These fees are negotiable, and the final fee schedule is attached in the Investment Advisory Contract/Investment Management Agreement/Solicitation Disclosure Statement. 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. 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 5 business days of signing the advisory contract/new account package. Advisory fees are withdrawn directly from the Client Account with Client written authorization. The Client may also pay fees and expenses related to the Client's investments in the underlay 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.

Services similar to those offered by Beacon may be available elsewhere for more or less than the amount Beacon charges for investment advisory services rendered to Clients enrolled in our wrap program.

For additional information regarding Beacon's Fees and Compensation for advisory services provided, please see Item 5 of Beacon's ADV Part 2A.

Beacon 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. Beacon may use other securities as well to help diversify a portfolio when applicable.

B. Explain that the program may cost the client more or less than purchasing such services separately and describe the factors that bear upon the relative cost of the program, such as the cost of the services if provided separately and the trading activity in the client's account.

The program may cost the Client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program including the cost of the services if provided separately and the trading activity in the Client Account.

C. Describe any fees that the client may pay in addition to the wrap fee, and describe the circumstances under which clients may pay these fees, including, if applicable, mutual fund expenses and mark-ups, markdowns, or spreads paid to market makers.

Although the wrap fee program is one fee for all management and brokerage services, there may be additional fees not associated with the management of Client Account. These fees may include trading fees, national securities exchange fees, wire transfer fees, or other fees required by law.

D. If the person recommending the wrap fee program to the client receives compensation as a result of the client's participation in the program, disclose this fact. Explain, if applicable, that the amount of this compensation may be more than what the person would receive if the client participated in your other programs or paid separately for investment advice, brokerage, and other services. Explain that the person, therefore, may have a financial incentive to recommend the wrap fee program over other programs or services.

Neither Beacon nor any representatives of Beacon receive any additional compensation for the participation of Client's in the wrap fee program. However, compensation received may be more than what would have been received if Client paid separately for investment advice, brokerage, and/or for other services. Therefore, Beacon may have a financial incentive to recommend the wrap fee program to

clients.

Item 5: Account Requirements and Types of Clients

If a wrap fee program imposes any requirements to open or maintain an account, such as a minimum account size, disclose these requirements. If there is a minimum amount for assets placed with each portfolio manager as well as a minimum account size for participation in the wrap fee program, disclose and explain these requirements. To the extent applicable to your wrap fee program clients, describe the types of clients to whom you generally provide investment advice, such as individuals, trusts, investment companies, or pension plans.

Beacon 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. Beacon requires a minimum account of \$5,000 for the Beacon Vantage 3.0 American Portfolio strategies. These minimum account requirements may be negotiable at Beacon 's discretion based on the Client's individual circumstances. Beacon may group certain related Client Accounts for the purposes of achieving the minimum account size.

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

- Individuals
- High-Net-Worth Individuals
- Corporations or Business Entities

Item 6: Portfolio Manager Selection and Evaluation

A. Describe how you select and review portfolio managers, your basis for recommending or selecting portfolio managers for particular clients, and your criteria for replacing or recommending the replacement of portfolio managers for the program and for particular clients.

Beacon will not select any outside portfolio managers for management of this wrap fee program. James Christopher Cook will be the portfolio manager for this wrap fee program.

1. Describe any standards you use to calculate portfolio manager performance, such as industry standards or standards used solely by you.

Beacon will use industry standards to calculate portfolio manager performance.

2. Indicate whether you review, or whether any third-party reviews, performance information to determine or verify its accuracy or its compliance with presentation standards. If so, briefly describe the nature of the review and the name of any third party conducting the review.

Beacon reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed daily and is reviewed by Beacon.

B. Disclose whether any of your related persons act as a portfolio manager for a wrap fee program described in the wrap fee program brochure. Explain the conflicts of interest that you face because of this arrangement and describe how you address these conflicts of interest. Disclose whether related person portfolio managers are subject to the same selection and review as the other portfolio managers that participate in the wrap fee program. If they are not, describe how you select and review related person portfolio managers.

No related persons act as a portfolio manager for the wrap fee program as described in this brochure. As such, there are no conflicts of interest with related persons and Beacon will not select any related persons as portfolio managers for this wrap fee program.

C. If you, or any of your supervised persons covered under your investment adviser registration, act as a portfolio manager for a wrap fee program described in the wrap fee program brochure, respond to Items 4.B, 4.C, 4. D (Advisory Business), 6 (Performance-Based Fees and Side-By-Side Management), 8.A (Methods of Analysis, Investment Strategies and Risk of Loss) and 17 (Voting Client Securities) of Part 2A of Form ADV.

1. Item 4.B.

Describe the types of advisory services you offer. If you hold yourself out as specializing in a particular type of advisory service, such as financial planning, quantitative analysis, or market timing, explain the nature of that service in greater detail. If you provide investment advice only with respect to limited types of investments, explain the type of investment advice you offer, and disclose that your advice is limited to those types of investments.

Beacon offers investment supervisory and investment advisory services to its wrap fee program participants as detailed in Item 4, above. Beacon 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. Beacon may use other securities as well to help diversify a portfolio when applicable.

2. Item 4.C.

Explain whether (and, if so, how) you tailor your advisory services to the individual needs of clients. Explain whether clients may impose restrictions on investing in certain securities or types of securities.

Beacon 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 Beacon from the client via the Firm, 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.

All clients have the ability to request reasonable restrictions on how their account is allocated, but Beacon may not be able to accommodate all restrictions based on specific mandates of particular strategies. If Beacon 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 Firm to find an investment solution that meets the client's expectations. If Beacon is unable to accommodate a client's requested restrictions, the client will need to find another firm to help meet their financial objectives.

3. Item 4.D.

If you participate in wrap fee programs by providing portfolio management services, (1) describe the differences, if any, between how you manage wrap fee accounts and how you manage other accounts, and (2) explain that you receive a portion of the wrap fee for your services.

Beacon participates in a wrap fee program, in which the client pays one stated fee that includes management fees and transaction costs from the custodian. Beacon manages the investments in the wrap fee program. Beacon does not manage 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 Beacon as a management fee.

4. Item 6.

If you or any of your supervised persons accepts performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client (such as a client that is a hedge fund or other pooled investment vehicle) – disclose this fact. If you or any of your supervised persons manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee, disclose this fact. Explain the conflicts of interest that you or your supervised persons face by

managing these accounts at the same time, including that you or your supervised persons have an incentive to favor accounts for which you or your supervised persons receive a performance-based fee, and describe generally how you address these conflicts.

Beacon does not receive performance-based fees for advisory services provided to its clients.

5. Item 8.A.

Describe the methods of analysis and investment strategies you use in formulating investment advice or managing assets. Explain that investing in securities involves risk of loss that clients should be prepared to bear.

1. Methods of Analysis

Beacon uses technical analysis to understand the historic patterns of the market and create a comprehensive strategy based on minimizing severe market volatility through broad diversification and a stop-loss trigger.

2. Investment Strategies

Beacon seeks to deliver consistent returns for the mid to long term investor through its mechanical investment management approach, which seek to minimize severe market volatility. Beacon's portfolios are based in strong, sector-based diversification. Additionally, Beacon utilizes pre-determined rules to dictate when to respond to changing markets, seeking to eliminate human emotion.

3. Risk of Loss

Investing involves risk of loss that clients should be prepared to bear. Many factors affect performance, and past performance does not guarantee futures results. Account values are expected to fluctuate and clients could lose money by investing. There is no assurance that Beacon will achieve the client's investment objective, and Beacon's investment strategy will not necessarily produce the intended results.

6. Item 17.

Authority to Vote Client Securities

If you have, or will accept, authority to vote client securities, briefly describe your voting policies and procedures, including those adopted pursuant to SEC rule 206(4)-6. Describe whether (and, if so, how) your clients can direct your vote in a particular solicitation. Describe how you address conflicts of interest between you and your clients with respect to voting their securities. Describe how clients may obtain information from you about how you voted their securities. Explain to clients that they may obtain a copy of your proxy voting policies and procedures upon request.

Beacon will not ask for nor accept voting authority for client securities.

Client Receipt of Proxies

If you do not have authority to vote client securities, disclose this fact. Explain whether clients will receive their proxies or other solicitations directly from their custodian or a transfer agent or

from you, and discuss whether (and, if so, how) clients can contact you with questions about a particular solicitation.

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 7: Client Information Provided to Portfolio Managers

Describe the information about clients that you communicate to the clients' portfolio managers, and how often or under what circumstances you provide updated information.

James Christopher Cook is the portfolio managers for this wrap fee program. All Client information that is collected, including basic information, risk tolerance, sophistication level, and income level will be collected by Beacon and provided to James Christopher Cook via the Investment Management Planning Questionnaire or from the Client's Advisor/Solicitor, Advisor Firm or Soliciting Firm of record via the Client's Investment Management Agreement. As that information changes and is updated, Beacon is to have immediate access to that information from the Client via a new Questionnaire or via information received on behalf of the Client from their Advisor/Solicitor, Advisor Firm or Soliciting Firm of record. Once the updated information is collected, Beacon will process and implement appropriate management updates.

Item 8: Client Contact with Portfolio Managers

Explain any restrictions placed on clients' ability to contact and consult with their portfolio managers.

Beacon places no restrictions on Client's ability to contact its portfolio managers. James Christopher Cook can be contacted during regular business hours.

Item 9: Additional Information

- A. *Respond to Item 9 (Disciplinary Information) and Item 10 (Other Financial Industry Activities and Affiliations) of Part 2A of Form ADV.*

1. Item 9.

If there are legal or disciplinary events that are material to a client's or prospective client's evaluation of your advisory business or the integrity of your management, disclose all material facts regarding those events.

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of Beacon or the integrity of its management.

2. Item 10.

A. Broker Dealer Registration

If you or any of your management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer, disclose this fact.

Brett Agnew, General Counsel of Beacon, is a registered representative of Sammons Financial Network, an affiliated broker-dealer.

No other management persons of Beacon are registered or have an application to register as a broker-dealer or as a registered representative of a broker-dealer.

B. Future Commission Merchant, Commodity Pool Operator or Commodity Trading Advisor

If you or any of your management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities, disclose this fact.

No management persons of Beacon are registered or have an application to register as a future commission merchant, commodity pool operator or commodity trading advisor or as an associated person of the foregoing entities.

C. Related Persons

Describe any relationship or arrangement that is material to your advisory business or to your clients that you or any of your management persons have with any related person listed below. Identify the related person and if the relationship or arrangement creates a material conflict of interest with clients, describe the nature of the conflict and how you address it.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor

5. banking or thrift institution 6. accountant or accounting firm 7. lawyer or law firm 8. insurance company or agency 9. pension consultant 10. real estate broker or dealer 11. sponsor or syndicator of limited partnerships.

Beacon is affiliated with the following broker-dealers, insurance companies, registered investment companies, registered investment advisors, insurance companies, and other financial entities, some of which may be considered material as described below:

1. **North American Company for Life and Health Insurance.** North American provides insurance products to consumers throughout most of the United States through a portfolio of term, universal life, and indexed universal life insurance products. North American also offers a wide variety of traditional fixed and fixed index annuities.
2. **Midland National Life Insurance Company.** Midland National provides insurance products to consumers throughout most of the United States through a portfolio of term, universal life, and indexed universal life insurance products. Midland National also offers a wide variety of traditional fixed and fixed index annuities as well as certain variable and registered index-linked annuities.
3. **Solberg Reinsurance Company, MNL Reinsurance Company, and Canal Reinsurance Company.** Solberg Reinsurance, MNL Reinsurance, and Canal Reinsurance are limited purpose captive reinsurance companies owned by Midland National.
4. **SFG Bermuda, Ltd.** SFG Bermuda is the captive reinsurance arm of Sammons Financial Group.
5. **SFG Tenura.** Tenura is holding company under Sammons Financial Group.
6. **Sammons Financial Network, Inc.** SFN is the distributor for Midland National's variable products. SFN is a registered broker/dealer under the Securities Exchange Act of 1934 and a member FINRA. SFN is an indirect wholly-owned subsidiary of Sammons Enterprises, Inc., of Dallas, Texas, the ultimate parent company of SFGAM.
7. **My Financial Freedom LLC.** My Financial Freedom is a licensed insurance agency in all states where Midland National and North American do business.
8. **Heyday Insurance Agency, LLC.** My Financial Freedom is a licensed insurance agency in all states where Midland National and North American do business.
9. **Sammons Financial Group Asset Management, Inc.** SFGAM is a registered investment advisor, providing investment management services to affiliated companies.

D. Recommendation or Selection of Other Investment Advisors

If you recommend or select other investment advisers for your clients and you receive compensation directly or indirectly from those advisers that creates a material conflict of

interest, or if you have other business relationships with those advisers that create a material conflict of interest, describe these practices and discuss the material conflicts of interest these practices create and how you address them.

Beacon does not receive compensation from other investment advisors for recommending or selecting their services for its clients.

- B. Respond to Items 11 (Code of Ethics, Participation or Interest in Client Transactions and Personal Trading), 13 (Review of Accounts), 14 (Client Referrals and Other Compensation), and 18 (Financial Information) of Part 2A of Form ADV, as applicable to your wrap fee clients*

1. Item 11.

A. Code of Ethics

If you are an SEC-registered adviser, briefly describe your code of ethics adopted pursuant to SEC rule 204A-1 or similar state rules. Explain that you will provide a copy of your code of ethics to any client or prospective client upon request.

Beacon maintains a written Code of Ethics designed to meet the requirements of Rule 204A-1 under the Advisers Act. The Code is intended to ensure that all acts, practices, and courses of business engaged in by the firm reflect high standards of integrity and comply with the requirements of applicable federal securities laws. All employees are subject to the requirements of the Code. Employees must avoid activities, interests, and relationships that might interfere or appear to interfere with making decisions in the best interests of its clients. The Code is designed to assure that the personal securities transactions, activities and interests of employees of Beacon will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Violations of the Code can result in personal sanctions, including termination of employment.

Our clients or prospective clients can request a copy of the Code of Ethics by contacting Beacon's Chief Compliance Officer at riacompliance@sfgmembers.com.

B. Recommendations Involving Material Financial Interests

If you or a related person recommends to clients, or buys or sells for client accounts, securities in which you or a related person has a material financial interest, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

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

C. Investing Personal Money in the Same Securities as Clients

If you or a related person invests in the same securities (or related securities, e.g., warrants, options or futures) that you or a related person recommends to clients, describe your practice and discuss the conflicts of interest this presents and generally how you address the conflicts that arise in connection with personal trading.

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

D. Trading Securities at or around the Same Time as Clients' Securities

If you or a related person recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that you or a related person buys or sells the same securities for your own (or the related person's own) account, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

From time to time, employees of Beacon may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for an employee of Beacon to buy or sell securities before or after recommending securities to clients resulting in the employee profiting off the recommendations provided to clients. Such transactions may create a conflict of interest. Beacon employees will always transact client transactions simultaneously with, or before, the employee.

2. Item 13.

A. Review of Client Accounts and Financial Plans

Indicate whether you periodically review client accounts or financial plans. If you do, describe the frequency and nature of the review, and the titles of the supervised persons who conduct the review.

Client accounts are monitored by Beacon on an ongoing basis by James Christopher Cook, President, as well as Beacon's trading team. Reviews might include comparisons against benchmark figures, performance, structure, adherence to client guidelines, prices, market conditions, portfolio holdings, transactions, and cash flows.

Emily Damman, Chief Compliance Officer, monitors client accounts on an ongoing basis for consistency with client objectives, portfolio guidelines, and restrictions.

B. Triggering Factors for Client Account Review

If you review client accounts on other than a periodic basis, describe the factors that trigger a review.

Client accounts may also be reviewed outside the set cadence under a number of circumstances, including client inquiry, atypical market activity, compliance checks, or changes in client's financial situation, including retirement, termination of employment, or physical move.

C. Client Reports

Describe the content and indicate the frequency of regular reports you provide to clients regarding their accounts. State whether these reports are written.

Clients engaged in investment supervisory and investment advisory services will receive, at minimum, a quarterly performance evaluation report from Beacon detailing the client's account. Each client will also receive a monthly statement from their custodian detailing their client account.

3. Item 14.

A. Economic Benefit from Third Parties for Advice

If someone who is not a client provides an economic benefit to you for providing investment advice or other advisory services to your clients, generally describe the arrangement, explain the conflicts of interest, and describe how you address the conflicts of interest. For purposes of this Item, economic benefits include any sales awards or other prizes.

Beacon may receive some economic benefit from its custodians in the form of support products and services it makes available to Beacon and other independent investment advisors that have their client accounts maintained at TD Ameritrade, Schwab or FCC. These products and services, how they benefit Beacon, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices in Beacon's Form ADV Part 2A). The availability of products and services offered by TD Ameritrade, Schwab or FCC is not based on Beacon providing particular investment advice, such as buying particular securities for clients.

B. Compensation of Non-Supervised Persons for Client Referrals

If you or a related person directly or indirectly compensates any person who is not your supervised person for client referrals, describe the arrangement and the compensation.

Beacon enters into soliciting arrangements with registered investment advisors, an affiliated broker-dealer of a registered investment advisor, or a broker-dealer ("Soliciting Firms") pursuant to which the representatives of their firms ("Solicitors") offer its services to the public. Through these arrangements, Beacon may pay a cash referral fee to the Soliciting Firm and/or Solicitor based upon a percentage of the 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, Beacon 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 Soliciting Firm, the Solicitor and Beacon. This information is disclosed prior to or at the time of entering into an Investment Management Agreement with Beacon. Soliciting Firms, through their Solicitors, on their own and not related in any way to their solicitors' agreements with Beacon and not on Beacon'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. Beacon 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 the client account.

Beacon is marketed by independent third parties that describe Beacon's investment strategies to Firms and provide ongoing resources. These third parties are compensated through a portion of the Beacon Management Fee.

4. Item 18.

A. Balance Sheet

If you require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, include a balance sheet for your most recent fiscal year.

Beacon does not require nor solicit prepayment of fees.

B. Financial Conditions

If you have discretionary authority or custody of client funds or securities, or you require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, disclose any financial condition that is reasonably likely to impair your ability to meet contractual commitments to clients.

Beacon does not have any financial conditions that are likely to reasonably impair its ability to meet its contractual commitments to its clients.

C. Bankruptcy Petition

If you have been the subject of a bankruptcy petition at any time during the past ten years, disclose this fact, the date the petition was first brought, and the current status.

Beacon has not been the subject of a bankruptcy petition.