

Promontory Financial Planning, LLC 240 N. East Promontory Ste 200 Farmington, UT 84025 801-513-2545 CRD#153666

This brochure provides information about the qualifications and business practices of Promontory Financial Planning, LLC. If you have any questions about the contents of this brochure, please contact us at 801-513-2545 and/or info@promontoryfp.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.

Additional information about Promontory Financial Planning also is available on the SEC's website at www.adviserinfo.sec.gov.

NOTE: While Promontory Financial Planning, LLC may refer to itself as a "registered investment advisor" or "RIA" clients should be aware that registration itself does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser

Brochure Supplement information about Brock & Tyra Williamson that supplements this Promontory Financial Planning Brochure can be found in Section 19 of this Brochure. Please contact Brock at 801-513-2545 or <u>info@promontoryfp.com</u> if you have any questions about the contents of the supplement information. Additional information about Brock & Tyra Williamson is also available on the SEC's website at www.adviserinfo.sec.gov.

Form ADV Part 2A: Firm Brochure Item 1: Cover Page Version Date: 1 Feb 2024 Page 1 of 39

Item 2: Material Changes

Material changes in this FIRM BROCHURE from the previous version are highlighted below.

The amount of discretionary assets under management has been updated to \$265,000,000 on page 5 under *Discretionary Assets Under Management*.

No other material changes have been made at this time.

Form ADV Part 2A: Firm Brochure Item 2: Material Changes Version Date: 1 Feb 2024 Page 2 of 39

Item 3: Table of Contents

Cover Page	. 1
Item 2: Material Changes from Previous Version	2
Item 3: Table of contents	3
Item 4: Advisory Business	4-7
Item 5: Fees and Compensation	6
Item 6: Performance-Based Fees and Side-by-Side management	.8
Item 7: Types of Clients	8
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9: Disciplinary Actions	9
Item 10: Other Financial Industry and Outside Business Activities	.9
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading Item 12: Brokerage Practices	
	11
Item 12: Brokerage Practices	.11
Item 12: Brokerage Practices Item 13: Review of Accounts	.11 .11 .12
Item 12: Brokerage Practices Item 13: Review of Accounts Item 14: Client Referrals and Other Compensation	11 .11 .12 .12
Item 12: Brokerage Practices Item 13: Review of Accounts Item 14: Client Referrals and Other Compensation Item 15: Custody	11 .11 .12 .12 .12
Item 12: Brokerage Practices Item 13: Review of Accounts Item 14: Client Referrals and Other Compensation Item 15: Custody Item 16: Investment Discretion.	11 .11 .12 .12 .12 .12
Item 12: Brokerage Practices Item 13: Review of Accounts Item 14: Client Referrals and Other Compensation Item 15: Custody Item 15: Investment Discretion Item 16: Investment Discretion Item 17: Voting Client Securities	11 .11 .12 .12 .12 .12 .12

Item 4: ADVISORY BUSINESS

Introduction

Promontory Financial Planning, LLC (hereafter "Promontory"), is a fee-based Registered Investment Adviser. Promontory offers two types of advisory services: Financial Planning and Asset Management. Promontory was established in August 2010 and a more complete description of the adviser representative background, education and qualifications can be found on page 13 of this FIRM BROCHURE.

Promontory's owners are Brock Williamson and Tyra Williamson. Each own an equal 50 percent of Promontory Financial Planning, LLC. Brock Williamson is the President and Chief Compliance Officer. Promontory currently has eleven investment advisor representatives. See ADV Part 2 for more details on each representative.

First Meeting

All client relationships begin with a free consultation where Promontory guides the Client through a discovery financial planning meeting. This financial meeting is used to gather information about the Client's financial condition, risk tolerance (Riskalyze or risk questionnaire), goals and financial objectives. All information is confidential and secure and given with the Client's permission. Through this process, the Client can gain an understanding of Promontory's services and style. Promontory can also assess the Client's needs. At the conclusion of the first meeting, if both parties agree the relationship is a good fit, the terms of service and compensation are agreed upon and the Client signs Promontory's *Investment Advisory Agreement*. This document serves as the contract between the Client and Promontory Financial planning, specifying the precise nature of services to be rendered by Promontory and the fees to be paid by the Client. Once the discovery meeting is completed and the Investment Advisory Agreement is entered into, the next meeting will be arranged and only then will any specific recommendations about the Client's portfolio be made.

Asset Management Services

If the Client selects Promontory's Asset Management services, the Clients assets management is done on a discretionary basis. Promontory evaluates the Client's financial condition, risk tolerance, needs and goals to formulate recommendations specific to the Client. Promontory allows the Client to impose any restrictions on investing in certain securities or types of securities.

Promontory will make recommendations primarily involving no-load mutual funds, index funds and exchange traded funds (ETFs). Promontory may, however, on occasion recommend exchange-listed securities (US stocks), securities traded over-the-counter or foreign stocks (ADR's), municipal securities, United States government securities, commercial paper, other corporate debt securities, certificates of deposit, real estate investment trusts or master limited partnerships. Advice may be given on Private Placements. Promontory will NOT use margin accounts. Given that the market will affect the value of these securities, Promontory will monitor client accounts and make necessary transactions in discretionary accounts.

Form ADV Part A: Firm Brochure Item 4: Advisory Business Version Date: 1 Feb 2024 Page 4 of 35 The securities Promontory may recommend reflect a broad range of investment risk, including some securities that entail high degrees of risk, some of which may not be suitable for the average investor.

Promontory does not provide "wrap programs" (programs that bundle brokerage and advisory services under a single comprehensive fee). Promontory may recommend funds or investments that have transaction fees to execute the trades at various custodians. These recommendations may include transaction charges by the custodian in addition to Promontory's advisory fee.

Discretionary Asset Management

Clients give Promontory discretionary authority by executing the appropriate documents with the custodian. This is known as "limited trading authority" and it allows Promontory to enter securities transactions on behalf of the client. This authority is limited to the determination of which securities, the amount of securities, and whether they are to be bought or sold. Trade confirmations and statements sent from the custodian will notify clients of transactions made in their behalf.

Promontory Asset Management services and advisory relationships will be done on a discretionary basis. At the time this document was prepared, 1 Feb 2024, Promontory has 265,000,000 under discretionary management. Clients should always monitor their account statements to verify the trading activity and withdrawals that occur in their accounts.

Financial Planning Service

Once the first meeting is complete and the client chooses to enter into a relationship with Promontory and the Investment Advisor Agreement is signed, a second meeting will ensue or be scheduled for a later date. Clients choosing this service will receive a written report with a financial plan designed to achieve the Client's stated financial goals and objectives. The financial plan may address the following elements:

- financial organization
 investment allocation
 estate planning
 risk analysis and insurance for life and long-term care
 retirement income plan
- Typically, the plan will be delivered to the client within 30 days, so long as the Client provides all the necessary documents and information. This information is confidential and secure. Information gathered includes prior year tax returns, wills and or trust documents, current investment, bank statements, insurance policies, and other financial data. These documents supplied by the client are carefully reviewed, including a risk questionnaire completed by the Client, and the written report is prepared to fit the Client's specific and individual needs.

Implementation of financial plan recommendations are entirely left up to the Client. Should a client choose to implement the recommendations contained in the plan without utilizing *Promontory's Asset Management* services as described above, Promontory suggests the client work closely with his/her attorney, accountant, insurance agent, and/or investment advisor. Financial Planning recommendations are not limited to any specific product or service offered by a custodian or insurance company. All recommendations are of a generic nature and are not product specific.

Annual Review

Promontory's relationship with the Client is ongoing and constant. An annual meeting review of the Client's financial plan helps evaluate the plan's effectiveness toward reaching goals, ensures the accuracy of financial information and brings to light any revisions or updates that may be necessary. If the Client experiences any events that could alter the plan, the Annual Review may be scheduled at an earlier time. Promontory will also be available for meetings outside of the annual review to discuss other specific financial topics or other securities investments that the client may want to discuss.

Consultation Services

Consultation Services may be used to help clients with specific planning situations. Examples include, Death of a parent include help with Estate Settlement, Divorce consultations or advanced business planning. Promontory will be available for meetings for *Promontory Consultation Services* with an additional fee agreement.

Item 5: FEES AND COMPENSATION

Investment Advisory Fees for Asset Management Services

Documents and fee schedules will be given to the client in an advisory agreement engagement letter. This will disclose fees along with the application and Form ADV brochure.

Fees and account minimums may be negotiable based on such factors as portfolio size, and aggregate amount invested with specific investment management programs as well as the simplicity of the asset allocation, implementation, or services required. Promontory Financial Planning charges no more than 2% annually for accounts. Fees may be reduced based upon specific asset levels maintained by the client through Promontory. Fees and corresponding reductions are detailed for each account in the Investment Advisory Services Agreement signed by the client at the time that investment accounts are opened. Fees paid to Promontory for investment advisory services are separate and distinct from the fees and expenses charged by the mutual funds, money managers, exchange traded funds or custodians and insurance or annuity contracts. These fees and expenses are described in each investment prospectus, Form ADV and/or separate account Form ADV Schedule H. These fees may include a fund or separate account management fee and or other fund expenses. The client should review the fees charged by the managers, the custodians, and insurance companies, the mutual funds, exchanged traded funds and the fees charged by Promontory to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

The client may terminate the Investment Advisory Agreement and receive a full refund of any investment advisory fee incurred within five business days from the date of the agreement by sending written notice to Promontory. This notice must be received by Promontory in this five-day period. The Client understands that if the agreement is terminated, their investment could be higher or lower than the original amount deposited based upon changes in market value during this period. After the five-day period, either the Client or the Advisor may cancel the Agreement by ten (10) days written notice. Any fees paid to Promontory will then be based on a pro-rated basis. Fees pro-rated will be on a daily basis.

Form ADV Part A: Firm Brochure Item 4: Advisory Business Item 5: Fees and Compensation Version Date 1 Feb 2024 Page 6 of 35 Promontory is compensated directly from the clients account for discretionary asset management services. Promontory does not have custody of any client account. The Custodian (SEI Private Trust Company, Charles Schwab, MG Trust, and Capital Group) deducts the fee according to the agreed upon fee schedule on the advisory agreement which is also on the client application. The custodian then sends an ACH payment to Promontory bank account. The fees are calculated and withdrawn from the Client's account(s) each quarter to Promontory from the custodian. The above-mentioned custodians will send a quarterly statement which documents the amount of the fee, the value of the client's assets upon which the fee was based, the specific manner in which the fee was calculated, and the time period of the fee. If custodian does not comply with these custodial fee requirements, Promontory will invoice the client quarterly with the same specifications on the invoice.

Other fees such as transaction, purchase or redemption fees associated with the specific custodian or security may apply and are outside of the above Asset Management fee schedule. Partial payments up to the date of termination will be deducted for accounts closing prior to quarter end. As a fiduciary, Promontory considers the "total cost" before making a specific recommendation. The Client will also execute paperwork allowing the custodian to deduct the Promontory advisory fee from the Client's account, as discussed in the *Fees and Compensation* section on page 5 of this FIRM BROCHURE. However, Promontory will not have authority to make any other withdrawals from the Client's account(s). Each Investment Advisors Representatives may have a slightly different fee schedules given the clients they serve. Please see your Advisory Agreement and application for your exact fee schedule along with quarterly or monthly statements for fee breakdowns. Promontory fees are reasonable for financial planning and investment management. However, lower fees for comparable services may be available from other sources.

Planning Fees:

For Clients that only want a plan without Asset Management, Promontory provides financial planning for a fee. These fees are non-negotiable. The fee's calculation is based on a non-negotiable \$150 per hour rate. As the Client's need for sophisticated planning increases, so does the fee. Consideration for tax management and estate planning, meeting with clients' other advisors (CPA, Attorney, Agent, etc.) will add to the time involvement of Promontory. An estimate for total hours will be determined at the start of the advisory relationship. Half of the estimated fee may be due upon signing the agreement, with the balance due upon presentation of the plan to the Client. Typically, the financial plan will be presented to the client within 30 days of the contract date, provided the necessary information is provided. Fees are paid by check. The client and or Promontory may terminate this planning contract upon written notice to the other party. If the agreement is terminated prior to services being rendered for billed hours, prospective clients will be refunded for hours not used.

Consultation Fees:

Promontory may also charge hourly fees for consultation with clients outside the above-mentioned financial planning process. The hourly, non-negotiable rate charged for consulting is \$150.

Form ADV Part A: Firm Brochure Item 5: Fees and Compensation: Version Date: 1 Feb 2024 Page 7 of 35

Fixed Fee Arrangements:

Promontory may enter a fixed fee arrangement with clients on a set dollar amount for financial planning services. The set dollar amount is either predetermined by the adviser or negotiated between the adviser and the client. Once the agreement is established, clients will pay fixed fees on a quarterly basis. Any fee payments paid in advance will have a time weight refund policy for the client. For example, if the quarterly fee is \$1,000 paid in advance and the agreement is terminated mid quarter the client would receive a refund of \$500.

Other Compensation:

In addition to the management, financial planning and consultation fees described above, Promontory may also have licensed insurance agents to sell insurance products and may receive insurance commissions for the sale of those insurance products.

This creates a conflict of interest because it offers an incentive to recommend insurance products that produce insurance commissions. Insurance recommendations made to the client will be given in the client's best interests. When any insurance recommendations are made, the commissions will be disclosed prior to completing any transaction and will obtain the Client's specific consent before making a purchase of any insurance product. Clients always have the right to decide whether to purchase insurance recommended by the firm. If they do decide to purchase, they have the right to decide through whom they will do so.

Commissionable Securities Sales

Paul Gelormini and David Goar are Registered Investment Advisor of Promontory. They are also registered representatives of Purshe Kaplan Sterling Investments, Inc ("PKS"), member FINRA/SIPC. As such they are able to accept compensation for the sale of securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. Clients should be aware that the practice of accepting commissions for the sale of securities presents a conflict of interest and gives our firm and/or our representatives an incentive to recommend investment products based on the compensation received. Our firm generally addresses commissionable sales conflicts that arise when explaining to clients these sales create an incentive to recommend based on the compensation to be earned and/or when recommending commissionable mutual funds, explaining that "no-load" funds are also available. See brochure supplements for more details.

Aside from the above-described insurance compensation and registration with PKS, Promontory does not accept any commission compensation for the sale of securities or other investment products.

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

Promontory does not charge performance-based fees (fees based on gains) and so none of its Clients' accounts will be managed side-by-side any performance-based accounts.

Form ADV Part A: Firm Brochure Item 6: Performance-Based Fees and Side-by-Side Management Version Date: 2 1 Feb 2024 Page 8 of 35

ITEM 7: TYPES OF CLIENTS

Promontory provides advisory services to various types of clients, including individuals, trusts and estates, small businesses and non-profit organizations. The majority of Promontory's Clients are individuals seeking planning and management services for their personal accounts. Financial Planning can be provided regardless of account values, but Asset Management services are restricted to those with a minimum account value of \$100,000. Promontory may waive the minimum requirement for select situations.

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

For *Financial Planning Services*, Promontory looks at the Client's financial goals and objectives, income, spending, debt, savings, investments, risks, insurance needs, asset allocations, and tax situation. These items are analyzed to create a plan that addresses the Client's needs and tracks progress toward their financial goals.

For *Asset Management Services*, Promontory uses a combination of fundamental and technical analysis when determining the investments in a portfolio.

Fundamental analysis is used to determine the overall soundness of a security by evaluating financial data and management structure of the company, as well as macroeconomic factors such as interest rates and economic data. No matter what the analysis indicates, any investment in securities carries market risk and investors may lose their principal investment.

Technical analysis looks at statistics from past prices and volume to identify trends and patterns to help determine the future direction of a security or the market. Promontory uses technical analysis to assist in determining whether we are at the top or bottom of a cycle and may need to adjust positions in the portfolio. Despite any technical analysis performed by Promontory, any investment in securities carries market risk and investors may lose their principal investment.

Investment within *Asset Management Services* will vary depending on the Client's specific situation. Generally, Clients who are looking to grow their accounts and have a longer time horizon and higher tolerance for risk will have a portfolio with a heavier weighting in equities. Those Clients who seek to preserve their principal, who may be investing for the short-term or have a low risk tolerance will generally be invested in more fixed income products. Promontory will manage each Client's portfolio according to their specific needs and goals.

Form ADV Part A: Firm Brochure Item 7: Types of Clients Item 8: Methods of Analysis, Investment Strategies and Risk of Loss Version Date: 1 Feb 2024 Page 9 of 35

Item 9: DISCIPLINARY INFORMATION

Promontory nor any of it representative have had any legal or disciplinary events or actions while employed with Promontory. Clients and prospective Clients are encouraged to view the CRD records (registration records) for Promontory, or for ANY financial advisor they may be looking at as a potential fiduciary, through the SEC's Investment Adviser Public Disclosure (IAPD) website at <u>www.adviserinfo.sec.gov</u>. The CRD number for Promontory Financial Planning is 153666.

Item 10: OTHER FINANCIAL INDUSTRY AND OUTSIDE BUSINESS ACTIVITIES

Any Promontory relationship or arrangement that are material to Clients are listed below. Any conflict of interest with clients are addressed.

1. Broker-dealer, municipal securities dealer, or government securities dealer or broker. **Yes.** Paul Gelormini and David Goar are an Investment Advisor Representative of Promontory and are also a registered representative of PKS, member FINRA/SIPC, and licensed insurance agents. As a result of these transactions, they receive commissions. A conflict of interest exists as these commissionable sales create an incentive to recommend products based on the compensation earned. To mitigate this potential conflict, our firm will act in the client's best interest.

Our firm is not registered, nor does it have an application pending to register, as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Our firm does not recommend or select other investment advisers for clients. Our firm does not directly or indirectly receive compensation for the recommendation or selection of other investment advisers.

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). None
 Other investment adviser or financial planner. None. Other than the Investment Advisor Representatives registered with Promontory.

4. Futures commission merchant, commodity pool operator, or commodity trading advisor. None

5. Banking or thrift institution. None.

6. Accountant or accounting firm. **Yes.** One of Promontory representatives Ron Valentine is a CPA. Ron works as a tax professional and is licensed as an investment advisor Representative of Promontory. This creates a conflict of interest in that Ron earns fees from tax advice and investment fees from the same client. This may create an incentive for Ron to recommend both tax and investment solutions to clients. When such recommendations are made, Promontory will disclose all fees associated with tax and investment fees. 7.lawyer or law firm. **None.**

Form ADV Part A: Firm Brochure Item 9: Disciplinary Information Item 10: Other Financial Industry and Outside Business Activities Version Date: 1 Feb 2024 Page 10 of 35 8.Insurance company or agency. **Yes**. While Promontory is not an insurance agency, some Registered Representative of Promontory may recommend insurance products. This creates a conflict of interest in that they earn insurance commissions for the sale of those products, which may create an incentive for them to recommend such products. When such recommendations are made, Promontory will disclose the conflict of interest and disclose that the insurance products recommended may be purchased from other insurance agents not affiliated with Promontory.

9. Pension consultant. None.

10.Real estate broker or dealer. None.

11.Sponsor or syndicator of limited partnerships. None.

Promontory does not recommend and does not receive compensation from other investment advisers for our clients.

Item 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND <u>PERSONAL TRADING</u>

Code of Ethics

Pursuant to SEC Rule 204A-1, Promontory Advisor has a Code of Ethics that promotes the fiduciary duty of Promontory. Promontory follows a similar code of ethics subscribed to by the Financial Planning Associations. Mainly treating, advising, and working with clients following these principals; integrity, objectivity, competence, fairness, confidentiality, professionalism, and diligence. The Code of Ethics requires that Promontory adhere to all securities related laws and regulations and requires the disclosure of all conflicts of interest. All supervised person at Promontory must acknowledge the terms of the Code of Ethics annually, or as amended. A full copy of Promontory's Code of Ethics is always available upon request for any Client or prospective Client.

Participation or Interest in Client Transactions and Personal Trading

While Promontory has no proprietary interest in Client transactions, its affiliated representatives may have a financial interest in those recommended transactions that involve the purchase of an insurance product. Please see item 10. As explained in the OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS section (pages 8-9), Some representatives are licensed as independent insurance agents. They may recommend insurance products and may also, as licensed agents, sell those recommended insurance products to Clients. When such recommendations or sales are made, it creates a conflict of interest because it may give incentive to recommend such products. Promontory requires that this conflict of interest is disclosed, and the Client be made aware that they may buy the recommended insurance products from other insurance agents not affiliated with Promontory.

Promontory affiliated persons may have an interest in Client transactions insofar as they may personally invest in the same securities recommended to Clients. Most of the same securities owned consist of Institutional share class or open-ended index mutual funds or Exchange Traded Funds. Mutual funds settle at the market close price ensuring clients and/or promontory employees would receive the same price for the shares if trades are entered the same day. Some exchange traded funds that track large indexes like the S&P 500 or individual securities that are traded during market hours could create a conflict of interest. This may create a situation where PFP representatives are able to materially benefit from the sale or purchase of those securities. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if the Registrant did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the representatives' clients) and other potentially abusive practices. PFP has a personal securities transaction policy in place in The Code of Ethics to monitor the personal securities transactions and securities holdings of each representative. This conflict is addressed with block and portfolio model trading. This allows all trades entered together. Clients and employees would receive the same price for the security. Any trades outside the bulk trade or model trade would need disclosed to the CFO within 10 days of the trade. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between PFP and its clients. The Code of Ethics is designed to ensure that the personal securities transactions, activities and interests of the employees of Promontory 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.

Item 12: BROKERAGE PRACTICES

Promontory will recommend SEI Private Trust to Clients and Charles Schwab as the primary independent custodians. In certain circumstances, we may also recommend the use of MG Trust (primarily for 401(k) plans and Capital Group. Promontory primarily recommends SEI for their trust custody platform, low transaction costs and usability of model trading platform.

Clients are not obligated to use SEI for the custodian, but if Clients want their accounts managed by Promontory on a discretionary basis, the chosen custodian must allow Promontory to have trading authority within the account.

Research and Other Soft Dollar Benefits

SEI offers research tools and publications to Promontory and other Advisers using their platform. Promontory has access to these tools and publications, which may be considered "soft dollar benefits" and constitute a conflict of interest. Promontory has access to these tools and publications regardless of the Client's decision to invest with SEI. Promontory uses these research tools to service all Clients regardless of the custodian they choose to use, but Clients who invest with SEI will also have their own access to the research tools and publications as account holders. Promontory believes that the services SEI provides and the expenses are competitive with other custodians.

Form ADV Part A: Firm Brochure Item 12: Brokerage Practices Version Date: 1 Feb 2024 Page 12 of 35

Directed Aggregated Orders

Promontory will rely on SEI, or the Client's chosen custodian, for the execution of transactions and will not direct trades to specific brokers. As such, Clients may not receive the lowest price possible if they were to have their trades directed to specific brokers. Promontory strives to treat all clients in a fair manner. The allocation of a security will be determined by PFP before the trade is placed. When practical, client and employee trades in the same security, they will be bunched in a single order (a 'block') to obtain the best execution at the best security price available.

Item 13: REVIEW OF ACCOUNTS

Promontory reviews all Asset Management Clients' accounts on an ongoing and continuous basis. Investment holdings are reviewed monthly in our team Investment Committee monthly review meeting. In this meeting portfolios and investment holdings are continuously evaluated. Every quarter, client specific accounts and statements are sent to clients. Annually a client meeting is established to review accounts and holdings with the client. *Asset Management* Clients are encouraged to meet with Promontory at least once per year to review their account, and determine if any adjustments need to be made to continue to fit the Client's current financial condition, goals and objectives.

For *Financial Planning* Clients, Promontory reviews the Client's account in the initial preparation of their written plan but does not review the Client's account again *unless* the Client schedules a consultation or Annual Review. Promontory recommends that *Financial Planning* Clients meet at least annually to see if adjustments need to be made to fit the Client's current financial condition, goals and objectives.

Item 14: CLIENT REFERRALS AND OTHER COMPENSATION

Promontory does not receive compensate from other professionals (i.e. accountants, lawyers) to refer their Clients to Promontory for investment advisory services. Promontory does not pay any compensation to other third parties for client referrals.

Item 15: CUSTODY

Promontory will not have physical custody of Clients' assets, monies, or securities. However, when Promontory has written authorization to deduct client fees from accounts, it is deemed to have "constructive custody". Please see item 5 for more information of deducting client fees from accounts.

Form ADV Part A: Firm Brochure Item 13: Review of Accounts Item 14: Client Referrals and Other Compensation Item 15: Custody Version Date: 1 Feb 2024 Page 13 of 35

Item 16: INVESTMENT DISCRETION

As described about in "ADVISORY BUSINESS" (page 4 of this FIRM BROCHURE), Promontory will have investment discretion for those Clients that elect to grant it. Those granting discretion will sign an Advisory Agreement acknowledging discretion. When Clients grant discretionary authority to Promontory, Clients may still place restrictions on the advisor, such as a prohibition on investing in specific securities, industries, or markets that the Client chooses.

Item 17: VOTING CLIENT SECURITIES

Promontory will not have or accept authority to vote Client securities for any security that entails a voting right in the underlying company. All voting issues, proxies, and solicitations will be communicated to Clients through the Client's broker-dealer/custodian. Upon request, Promontory may help explain or answer questions regarding a given voting issue.

Item 18: FINANCIAL INFORMATION

Promontory would be required to disclose additional financial information if it were to charge fees in advance, but as described in the FEES AND COMPENSATION section (pages 6 of this FIRM BROCHURE), Promontory charges management fees in arrears. Promontory has discretionary authority of client funds or securities. Promontory does not have any financial condition that is reasonably likely to impair the ability to meet contractual commitments to clients. Promontory has no bankruptcy petition at any time during the past ten years.

Item 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Promontory is co-owned by Brock Williamson and Tyra Williamson, each with a 50 percent share of the company. Brock is the Registered Representative of Promontory and is the Principal Advisor. Tyra is a Registered Representative of Promontory. A more complete background of education and business experience is provided for Brock & Tyra below. As described earlier in the FEES AND COMPENSATION section of this FIRM BROCHURE, the subsection titled OTHER COMPENSATION explains that Affiliated Persons of Promontory may be licensed as insurance agents and may receive insurance commissions for the sale of insurance products. This activity and the conflicts of interest associated with it are discussed in the OTHER COMPENSATION subsection on page 6 of this FIRM BROCHURE.

Series examinations are licenses. Taking and passing any Series examination is not a guaranty of licensure. Promontory would be required to disclose additional information if it: were to charge performance-based fees; had any other relationship or arrangement with any issuer of securities; or was ever found liable in either: (a) an arbitration, or (b) a civil, self-regulatory organization, or administrative proceeding. As none of these apply to Promontory, there is not information to disclose in these regards. Promontory has reasonably disclosed all material conflicts of interest.

Form ADV Part A: Firm Brochure Item 16: Investment Discretion Item 17: Voting Client Securities Item 18: Financial Information Item 19: Requirements for State-Registered Advisers Version Date: 1 Feb 2024 Business Continuity Plan (BCP). Promontory maintains a BCP to identify procedures relating to an emergency or significant business disruption, including but not limited to incapacitation, dissolution, or death of the investment adviser or its representatives. Promontory BCP enables the investment adviser and its representatives to meet their existing fiduciary obligations to clients. Client may request the full BCP at any time from a Promontory representative.

Item 20: Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure. We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys. We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law. You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

Form ADV Part A: Firm Brochure Item 20: Business Experience and Background of Members Version Date: 1 Feb 2024 Page 15 of 35



Brock Williamson, CFP® CRD#4876027

Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-513-2545 1 Feb 2024 CRD# 153666

This brochure supplement provides information about Brock Williamson that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about Brock Williamson is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

A. General Requirements

Generally, Promontory Financial Planning requires employees to hold a college or advanced degree or have relevant working experience in the securities industry. Any employee of Promontory acting in a representative capacity will be appropriately licensed or registered as such.

B. Investment Adviser Representative Information

We currently have ten (10) investment adviser representative employed by Promontory Financial Planning. The following Brochure Supplements provides information about each of our advisor representatives.

Item 2: Educational Background and Business Experience

Name: Brock Williamson

Born: 1979

Education Background and Professional Designations:

Bucknell University, Bachelor of Science in Business Administration, 2004 St. Joseph's University, Master in Finance, 2006 CFP® Certified Financial Planner, 2009 Registered Investment Advisor Representative

Business Background:

2015 – Present: President and Principal Investment Adviser Representative
Promontory Financial Planning, Farmington UT
2004-2015: SEI Advisor Network, Investment Consultant and Regional Director Mountain West, Oaks PA
2002-2003: Kalin Investments, Advisor Assistant, Lewisburg PA

Item 3: Disciplinary Information

It is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of any investment advisor representative who formulates investment advice for clients. No information is applicable to this item for Brock Williamson. For more information on Brock Williamson you may visit www.adviserinfo.sec.gov

Item 4: Other Business Activities

In addition to Brock Williamson activities as an investment advisor representative of Promontory Financial Planning. Brock Williamson may engage in the sale of insurance products that do not come within the definition of "securities". As an insurance agent, Brock Williamson may be authorized and licensed to sell the following insurance products.

- Life Insurance Products
- Fixed Annuity Contracts

Item 5: Additional Compensation

Other than fees taken directly from client accounts, hourly advice fees or flat fee arrangements, Brock Williamson may receive additional compensation for sales of the above insurance products.

Item 6: Supervision

Brock Williamson, whose phone number is (801) 513-2545 is the principal and Chief Compliance officer of Promontory Financial Planning Principal and is responsible for the supervision of all representatives. He will adhere to the firm's policies and procedures.

Tyra Williamson CRD#4864359

Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-513-2545 1 Feb 2024 CRD# 153666

This brochure supplement provides information about Tyra Williamson that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about Brock Williamson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Name: Tyra Williamson

Born: 1979

Education Background and Professional Designations:

Pennsylvania State University, Bachelor of Science in Communications, 2004

Business Background:

2010 – Present: Owner Promontory Financial Planning and Investment Adviser Representative, Farmington UT 2004-2007: Vanguard, Flagship representative, Malvern PA

Item 3: Disciplinary Information

It is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of any investment advisor representative who formulates investment advice for clients. No information is applicable to this item for Tyra Williamson. For more information on Tyra Williamson you may visit <u>www.adviserinfo.sec.gov</u>

Item 4: Other Business Activities

Tyra Williamson works for Endeavour elementary teaching a finance class to children in 6th grade. She also helps with special projects at the school. This takes her 5 to 10 hours a week. Tyra Williamson may engage in the sale of insurance products that do not come within the definition of "securities". As an insurance agent, Tyra Williamson may be authorized and licensed to sell the following insurance products.

- Life Insurance Products
- Fixed Annuity Contracts

Item 5: Additional Compensation

Other than fees taken directly from client accounts, hourly advice fees or flat fee arrangements, Tyra Williamson may receive additional compensation for sales of the above insurance products. Tyra also receives hourly fees for teaching finance classes at Endeavour elementary school.

Item 6: Supervision

Brock Williamson, whose phone number is 801-513-2545 is the Promontory Financial Planning Principal responsible for the supervision of Tyra Williamson's activities as an investment advisory representative.

Russell "Mic" Morrell Bowen 255 S Main St. A-155 Logan, UT 84321 (435) 770-5786 CRD# 4583955

Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-513-2545 CRD# 153666

1 Feb 2024

This brochure supplement provides information about Ross Morrell Bowen (Mic Bowen) that supplements the Promontory Financial Planning brochure. Mic Bowen is a registered Investment Advisor Representative in Utah and Idaho. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about Mic Bowen is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

Item 2: Educational Background and Business Experience

Name: Ross Morrell Bowen

Born: 1975

Education Background and Professional Designations:

Rick College Assoc. Marketing, 1997 Brigham Young Bachelor Accounting, 2000 Brigham Young Master (Macc) Acctg & Taxation, 2000 Utah State University Master of Human Resources, 2016

CPA - Certified Public Accountant—Status inactive, not practicing for and behalf of Promontory FP LNHA- Licensed Nursing Home Administrator

Business Background:

Investment Adviser Representative
Promontory Financial Planning
Investment Adviser Representative
Foresight Wealth Management, LLC
Registered Representative
Yellowstone Partners, LLC
Administrator Sunbridge Health Care
Administrator Kindred Health Care

Item 3: Disciplinary Information

It is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of any investment advisor representative who formulates investment advice for clients. No information is applicable to this item for Mic Bowen. For more information on Mic Bowen you may visit www.adviserinfo.sec.gov

Item 4: Other Business Activities

Ross Morrell Bowen serves on the board of directors for Bank of Commerce. He is also the Executive Director of a nonprofit organization in Cache County UT. Mr. Bowen spends 20-30 hours per week on these other activities depending on the season.

Item 5: Additional Compensation

Other than fees taken directly from client accounts, Ross Morrell Bowen does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Promontory Financial Planning, LLC.

Item 6: Supervision

Brock Williamson, whose phone number is 801-513-2545 is the Promontory Financial Planning Principal responsible for the supervision of Mic Bowen's activities as an investment advisory representative.

John Dudley Houck 240 N E Promontory Suite 200 Farmington, UT 84040 (801) 471-1322 CRD# 250809

Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-513-2545 CRD# 153666

1 July 2023

This brochure supplement provides information about John Dudley Houck that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about John Dudley Houck is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Name: John Dudley Houck Year of Birth: 1939

Formal education after high school: LaSalle University PhD Education, American College MSM Management, BS in Economics, CHFC, CLU, LUTCF designations.

General business background during the last 5 years:

Responsible for advising financial products to customers to help them prepare for and live in retirement.

Business Background:

Financial Advisor, Promontory Financial Planning, October 2017 to Present Registered Representative, VOYA FINANCIAL ADVISORS, INC. 2012 – 10/14/2017 CEO of Western Pacific Financial Services, INC. A financial Advisory Firm July 1976 to May 2004 Vice President and Director of Agency for Certified Life Insurance Company 1972-1976

Item 3: Disciplinary Information

It is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of any investment advisor representative who formulates investment advice for clients. No information is applicable to this item for John Dudley Houck.

Item 4: Other Business Activities

John Dudley Houck is an Investment Advisor Representative of Promontory Financial Planning LLC. If requested, John Dudley Houck may execute securities transactions to implement a financial plan that he has developed in his capacity as an investment advisory representative. Promontory Financial Planning receives fees directly from client accounts. John Dudley Houck receives a portion of those fees from Promontory Financial Planning. John Dudley Houck is also required to comply with Promontory Financial Planning Code of Ethics and Policy and Procedures.

In addition to John Dudley Houck activities as an investment advisor representative of Promontory Financial Planning. John Dudley Houck may engage in the sale of insurance products that do not come within the definition of "securities". As an insurance agent, John Dudley Houck may be authorized and licensed to sell the following insurance products.

- Life Insurance Products
- Fixed Annuity Contracts

Item 5: Additional Compensation

John Dudley Houck may receive additional compensation for sales of the above insurance products.

Item 6: Supervision

Brock Williamson, whose phone number is 801-513-2545 is the Promontory Financial Planning Principal responsible for the supervision of John Dudley Houck activities as an investment advisory representative of Promontory Financial Planning.

Robyn D. Simons 944 E. Gordon AVE Layton, UT 84040 (801) 444-3710 CRD# 1538638

Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-513-2545 CRD# 153666

1 Feb 2024

This brochure supplement provides information about Robyn D. Simons that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about Robyn D. Simons is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Name:Robyn D. SimonsYear of Birth:1955

Formal education after high school: BYU 1980-1984 Bachelor's Degree

General business background during the last 5 years:

Responsible for marketing insurance and financial products to customers to help them prepare for and live in retirement.

Positions held during the last 5 years:

Financial Advisor, Promontory Financial Planning, October 2017 to Present Registered Representative, BERTHEL, FISHER & COMPANY FINANCIAL SERVICES, INC., 05/13/2008 -09/27/2017

Item 3 Disciplinary Information

It is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of any investment advisor representative who formulates investment advice for clients. While Robyn D. Simons was registered with BERTHEL, FISHER & COMPANY FINANCIAL SERVICES the below client compliant lead to a settlement. Allegations: The claimant alleges the investments made in her accounts between 2013 and 2015 were unsuitable and misrepresented to her by the representative. Settlement Amount: \$21,500.00 Broker Comment: The Firm, solely to compromise and settle disputed claims, agreed to settle an arbitration with the Claimant.

Item 4 Other Business Activities

Robyn D. Simons is an Investment Advisor Representative of Promontory Financial Planning LLC. If requested, Robyn D. Simons may execute securities transactions to implement a financial plan that he has developed in his capacity as an investment advisory representative. Promontory Financial Planning receives fees directly from client accounts. Robyn D. Simons receives a portion of those fees from Promontory Financial Planning. Robyn D. Simons is also required to comply with Promontory Financial Planning Code of Ethics and Policy and Procedures.

In addition to Robyn D. Simons activities as an investment advisor representative of Promontory Financial Planning. Simons may engage in the sale of insurance products that do not come within the definition of "securities". As an insurance agent, Robyn D. Simons may be authorized and licensed to sell the following insurance products on behalf of Behling Insurance Agency Inc.

- Personal Lines Property and Casualty Insurance (e.g., homeowners, automobile, motorcycle and boat insurance)
- Commercial Lines Property and Casualty Insurance
- Health, Disability and Long-Term Care Insurance
- Fixed Life Insurance Products
- Fixed Annuity Contracts

Item 5 Additional Compensation

Ron R. Valentine may receive additional compensation for sales of the above insurance products.

Item 6 Supervision

Brock Williamson, whose phone number is 801-513-2545 is the Promontory Financial

Planning Principal responsible for the supervision of Robyn D. Simons activities as an investment advisory representative of Promontory Financial Planning.

Ron R. Valentine 944 E. Gordon AVE Layton, UT 84040 (801) 444-3710 CRD# 2517387

Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-513-2545 CRD# 153666

1 Feb 2024

This brochure supplement provides information about Ron Valentine that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about Ron Valentine is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Name:Ron R. ValentineYear of Birth:1957

Formal education after high school:

Brigham Young University, Bachelor's Degree, 1982 Brigham Young University, Master's Degree, 1986

General business background during the last 5 years:

Responsible for marketing insurance and financial products to customers to help them prepare for and live in retirement.

Positions held during the last 5 years:

Financial Advisor, Promontory Financial Planning, October 2017 to Present Registered Representative, BERTHEL, FISHER & COMPANY FINANCIAL SERVICES, INC., 05/13/2008 -09/27/2017

Item 3 Disciplinary Information

It is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of any investment advisor representative who formulates investment advice for clients. No information is applicable to this item for Ron R. Valentine.

Item 4 Other Business Activities

Ron R. Valentine is an Investment Advisor Representative of Promontory Financial Planning LLC. If requested, Ron R. Valentine may execute securities transactions to implement a financial plan that he has developed in his capacity as an investment advisory representative. Promontory Financial Planning receives fees directly from client accounts. Ron R. Valentine receives a portion of those fees from Promontory Financial Planning. Ron R. Valentine is also required to comply with Promontory Financial Planning Code of Ethics and Policy and Procedures.

Ron valentine is the owner of Valentine CPA, A Professional Corporation which offers traditional accounting services of tax preparation, payroll processing, bookkeeping and consulting. In addition to Ron R. Valentine activities as an investment advisor representative of Promontory Financial Planning, Ron R. Valentine may engage in the sale of insurance products that do not come within the definition of "securities". As an insurance agent, Ron R. Valentine may be authorized and licensed to sell the following insurance products on behalf of Behling Insurance Agency Inc.

- Personal Lines Property and Casualty Insurance (e.g., homeowners, automobile, motorcycle and boat insurance)
- Commercial Lines Property and Casualty Insurance
- Health, Disability and Long-Term Care Insurance
- Fixed Life Insurance Products
- Fixed Annuity Contracts

Item 5 Additional Compensation

Ron R. Valentine may receive additional compensation for sales of the above insurance products.

Item 6 Supervision

Brock Williamson, whose phone number is 801-513-2545 is the Promontory Financial

Planning Principal responsible for the supervision of Ron R. Valentine activities as an investment advisory representative of Promontory Financial Planning.

Paul Gelormini Doing Business As: **Gelormini Financial** 4966 El Camino Real ste 121 Los Altos, CA 94022 650-965-1623 CRD# 2066089

> Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-503-2545 CRD# 153666

> > 1 Feb 2024

This brochure supplement provides information about Paul Gelormini that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about Paul Gelormini is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Name:Paul GelorminiYear of Birth:1967

Formal education after high school:

Mr. Gelormini graduated from the University of California-Berkley in 1989 with a Bachelor's degree in English.

General business background and position held during the last 5 years:

Paul started with Promontory Financial planning in January of 2019. Prior to that he worked as an investment adviser representative with Liberty Group, Securities America Advisors, and Eplanning Advisors.

Item 3 Disciplinary Information

It is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of any investment advisor representative who formulates investment advice for clients. Paul does not have any disclosable or disciplinary events.

Item 4 Other Business Activities

Paul Gelormini is an Investment Advisor Representative of Promontory Financial Planning LLC. If requested, Paul Gelormini may execute securities transactions to implement a financial plan that he has developed in his capacity as an investment advisory representative. Promontory Financial Planning receives fees directly from client accounts. Paul Gelormini receives a portion of those fees from Promontory Financial Planning. Paul Gelormini is also required to comply with Promontory Financial Planning Code of Ethics and Policy and Procedures.

In addition to Paul Gelormini activities as an investment advisor representative of Promontory Financial Planning. Paul may engage in the sale of commission-based investments with PKS broker dealer. Paul may also utilize insurance products that do not fit within the definition of "securities". As an insurance agent and series 7 licensed, Paul Gelormini may sell the following products.

- Mutual Funds with trail commissions
- Life Insurance Products
- Annuity Contracts

Item 5 Additional Compensation

Paul is a representative of Purshe Kaplan Sterling Investments, Inc ("PKS"), member FINRA/SIPC. As such they are able to accept compensation for the sale of securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. Clients should be aware that the practice of accepting commissions for the sale of securities presents a conflict of interest and gives Paul an incentive to recommend investment products based on the compensation received. Promontory generally addresses commissionable sales conflicts that arise when explaining to clients these sales create an incentive to recommend based on the compensation to be earned and/or when recommending commissionable mutual funds, explaining that "no-load" funds are also available.

Item 6 Supervision

Brock Williamson, whose phone number is (801) 513-2545 is the Promontory Financial Planning Principal responsible for the supervision of Paul Gelormini activities as an investment advisory representative of Promontory Financial Planning.

Weldon Reeves 15150 Middlebrook Drive Houston, Texas 77058 281-990-8228 CRD#2878694

Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-503-2545 CRD# 153666

1 Feb 2024

This brochure supplement provides information about Weldon Reeves that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about Weldon Reeves is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education and Business Experience

Name:Weldon ReevesYear of Birth:1963

Formal education after high school:

Master of Business Administration, University of Utah, 1988.

Bachelor of Science in Accounting, Brigham Young University, 1986.

Certified Public Accountant ("CPA") is a title conferred to qualified accountants who have passed the Uniform Certified Public Accountant Examination and have met additional educations and experience requirements for certification as a CPA. *Personal Financial Specialist (PFS) designation*: The Personal Financial Specialist (PFS) is a designation held only by a Certified Public Accountant (CPA) who specializes in personal financial planning. This designation is conferred upon CPAs by the American Institute of CPAs ("AICPA") upon the completion of related education and experience, and the successful completion of the PFS examination.

General business background and position held during the last 5 years:

Weldon Reeves has been assisting employees and executives, retirees, entrepreneurs, and businesses with their retirement plans for over 25 years. He has taught, advised, and consulted with employees and retirees of United Space Alliance, IBM, Lockheed Martin, Boeing, BP, Reliant Energy (HL&P), The Coastal Corporation, and MD Anderson. He also regularly consults and advises successful entrepreneurs and professionals regarding their retirement and investment plans. Prior to starting his own firm in 1996, Weldon was the manager of the U.S. and Canadian retirement plans for The Coastal Corporation; he held a similar position with Houston Lighting & Power (now known as Reliant Energy and Centerpoint Energy). Weldon was a member of the Personal Financial Planning team and the Benefits & Compensation team at Arthur Andersen & Company. His first corporate job out of school was as the investment's accountant and employee benefits public speaker for Deseret Mutual Benefits Administrator. Some of his most recent related business experience includes, but is not limited to:

Investment Advisor Representative, Promontory Financial Planning, 1/2019 to Present Managing Director/Investment Adviser Representative/Chief Investment Officer/Compliance Officer TR&R Investment Advisors, LLC (2004 to 2019) DBA WJ REEVES Financial Group President Weldon J. Reeves, CPA, PC (1997 to 2011) Registered Representative Main Street Securities, LLC (2001 - 2003)

Item 3 Disciplinary Information

Weldon J. Reeves does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

Weldon J. Reeves, the Managing Member and Principal Owner, is an insurance agent licensed with the Texas Department of Insurance as a General Lines Agent to sell life, accident, health, and fixed insurance products. Clients are advised that Mr. Reeves conducts insurance business through WJ REEVES. In his capacity as an insurance agent, he will receive separate, yet customary compensation for insurance product sales, generally receiving commissions on insurance-related products. Weldon J. Reeves is a certified public accountant (CPA). He has operated and owned his own CPA firm and subsequently served as a partner in an unaffiliated CPA firm. Although his CPA firm is no longer active and Mr. Reeves is no longer a partner in a CPA firm or engaging in business as a CPA, Mr. Reeves offers tax return services to clients of WJ REEVES. Mr. Reeves also serves as Director and Principal of TR&R Management, Inc., a Texas corporation located in Houston, Texas. TR&R Management, Inc. serves as a marketing company and is not investment related.

Item 5 Additional Compensation

Other than as noted above in Item 4, Weldon J. Reeves, Investment does not receive any additional compensation for providing investment advice beyond the compensation he receives through WJ REEVES.

Item 6 Supervision

Brock Williamson, whose phone number is (801) 513-2545 is the Promontory Financial Planning Principal responsible for the supervision of Weldon Reeves activities as an investment advisory representative of Promontory Financial Planning.

William E. Sandberg Doing Business As: **Flint Meadows Financial** 1330 Flint Meadow Drive Kaysville, UT. 84037 801-690-1196

> Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-503-2545 CRD# 153666

> > 1 Feb 2024

This brochure supplement provides information about William E. Sandberg that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about William E. Sandberg is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education and Business Experience

Name: William E. Sandberg Year of Birth: 1978

Formal education after high school:

Bachelor of Science, Weber State University, 2001

Certified Estate Planner ("CEP") is a title conferred to those having completed the NICEP Course and all Qualifying Examinations and has shown a desire to associate with professional estate planning peers.

Certified Medicaid Planner ("*CMP*") is a title for one who possesses the necessary professional experience and has fulfilled the educational, examination, experience and ethical requirement for the designation.

General business background and position held during the last 5 years:

William's first job out of school in 2001 was as the marketing director of a medical manufacturing firm. In 2004 he became a Certified Rehab Technician, helping disabled persons with wheelchair fitting and equipment customization. In 2006 he got his insurance license and specialized in Senior Medicare insurance.

William founded Utah Senior Planning in 2007 with the vision of helping seniors navigate their way through the complex healthcare delivery system of hospitals, skilled nursing, custodial care, insurance and prescription costs.

Over the years Will has put together a team of professionals that a Senior and their family can rely on to help walk them through the legal, financial, and insurance issues they face when confronted with the care of a loved one.

Will was the first in the State of Utah to utilize DRA-compliant annuities as a Medicaid planning option. This planning option is key to helping a spouse of a nursing home resident keep from becoming impoverished / destitute.

Some of his most recent related business experience includes, but is not limited to:

Curriculum Development Advisor, Certified Medicaid Planner Governing Board, 2/2019 to Present

President Utah Senior Planning (2008 to Present)

Fortified Benefits Insurance Agency (2006 to 2008)

Item 3 Disciplinary Information

William E. Sandberg does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

William E. Sandberg, the President and Principal Owner, is an insurance producer and consultant licensed with the Utah Department of Insurance as a General Lines Agent to sell life, accident, health, and fixed insurance products. Clients are advised that Mr. Sandberg conducts insurance business through Utah Senior Planning. In his capacity as an insurance agent, he will receive separate, yet customary compensation for insurance product sales, generally receiving commissions on insurance-related products.

Item 5 Additional Compensation

Other than as noted above in Item 4, William E. Sandberg, does not receive any additional compensation for providing investment advice. Will may receive additional compensation for sales of the above insurance.

Item 6 Supervision

Brock Williamson, whose phone number is (801) 513-2545 is the Promontory Financial Planning Principal responsible for the supervision of William E. Sandberg activities as an investment advisory representative of Promontory Financial Planning.

David M. Goar Doing Business As: Goar Financial Services 1826 East 3100 North, Suite A Layton, UT 84040 385-715-0120

> Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-503-2545 CRD# 153666

> > 1 Feb 2024

This brochure supplement provides information about David M. Goar that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about David M. Goar is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

David M. Goar, Born 01/77

Education Background: Brigham Young University, Bachelor of Science, Sociology, 2001 *Business Background & Other Business Activities*: Reutemann Financial Solutions.: Investment Advisor Representative, 03/2015 – 3/31/2022 Goar Financial Services LLC: Owner, 06/2018 - Present Purshe Kaplan Sterling Investments: Registered Representative, 03/2015 - Present UBS Financial Services: Financial Advisor, 01/2007 to 03/2015 *Professional Designations: None*

Item 3 Disciplinary Information

David M. Goar has never been subject to a legal or disciplinary event.

Item 4 Other Business Activities

David M. Goar is an Investment Advisor Representative of Promontory Financial Planning LLC. If requested, David may execute securities transactions to implement a financial plan that he has developed in his capacity as an investment advisory representative. Promontory Financial Planning receives fees directly from client accounts. David receives a portion of those fees from Promontory Financial Planning. David M. Goar is also required to comply with Promontory Financial Planning Code of Ethics and Policy and Procedures.

In addition to David M. Goar activities as an investment advisor representative of Promontory Financial Planning, David may engage in the sale of commission-based investments with PKS broker dealer. David may also utilize insurance products that do not fit within the definition of "securities". As an insurance agent and series 7 licensed, David may sell the following products.

- Mutual Funds with trail commissions
- Life Insurance Products
- Annuity Contracts

Item 5 Additional Compensation

David M. Goar is a representative of Purshe Kaplan Sterling Investments, Inc ("PKS"), member FINRA/SIPC. As such they are able to accept compensation for the sale of securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. Clients should be aware that the practice of accepting commissions for the sale of securities presents a conflict of interest and gives David an incentive to recommend investment products based on the compensation received. Promontory generally addresses commissionable sales conflicts that arise when explaining to clients these sales create an incentive to recommend based on the compensation to be earned and/or when recommending commissionable mutual funds, explaining that "no-load" funds are also available.

Item 6 Supervision

Brock Williamson, whose phone number is (801) 513-2545 is the Promontory Financial Planning Principal responsible for the supervision of David M. Goar activities as an investment advisory representative of Promontory Financial Planning.

Jon Aaron Paulsen Doing Business As: **Premier Financial Planning** 2123 W Loveland Ln. Farmington, UT. 84025 801-710-7294 CRD#5534292

> Promontory Financial Planning 240 N E Promontory Suite 200 Farmington, UT 84025 801-503-2545 CRD# 153666

> > 1 Feb 2024

This brochure supplement provides information about Jon Aaron Paulsen that supplements the Promontory Financial Planning brochure. You should have received a copy of that brochure. Please contact Promontory Financial Planning if you did not receive our firm's brochure at 1-801-513-2545 or if you have any questions about the contents of this supplement.

Additional information about Jon Aaron Paulsen is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Education and Business Experience

Name:Jon Aaron PaulsenYear of Birth:1984

Formal education after high school:

Bachelor of Science: Finance, Weber State University, 2008 Master of Business Administration, Brigham Young University, 2012 *Chartered Financial Analyst ("CFA")* is a designation conferred to those having completed 3 exams on a broad range of financial analysis topics as well as 3 years of financial analysis experience.

General business background and position held during the last 5 years:

Jon began his post-college career at Fidelity Investments as a stockbroker. He obtained his series 7 and 63 licenses at that time and gained a broad understanding of the financial markets. He then went to business school and obtained an MBA from Brigham Young University. His focus in business school was finance with an emphasis in financial markets, investment management, and derivatives. Upon graduation, he worked for Zions Bancorporation for over 10 years. While working for the bank, Jon was heavily involved in economic forecasting, debt market analysis, interest rate analysis and sensitivity, and various other finance and accounting functions. During that time, he also studied for and obtained the Chartered Financial Analyst designation.

Item 3 Disciplinary Information

Jon Aaron Paulsen does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

Item 4 Other Business Activities

Jon Aaron Paulsen is an insurance producer licensed with the Utah Department of Insurance as a General Lines Agent to sell life, accident, health, and fixed insurance products. Clients are advised that Jon conducts insurance business. In his capacity as an insurance agent, he will receive separate, yet customary compensation for insurance product sales, generally receiving commissions on insurance-related products.

Item 5 Additional Compensation

Other than as noted above in Item 4, Jon Aaron Paulsen does not receive any additional compensation for providing investment advice. Jon may receive additional compensation of the above insurance.

Item 6 Supervision

Brock Williamson, whose phone number is (801) 513-2545 is the Promontory Financial Planning Principal responsible for the supervision of Jon Aaron Paulsen activities as an investment advisory representative of Promontory Financial Planning.