Beacon Financial Planning of Cape Cod, Inc. 72 Pine Street

Hyannis, MA 02601

Phone: 508-790-7039 Fax: 617-334-7967

www.beaconfinancialplanningcapecod.com

July 11, 2018

Form ADV Part 2A Brochure

This brochure provides information about the qualifications and business practices of Beacon Financial Planning of Cape Cod, Inc. If you have any questions about the contents of this Brochure, please contact Michaela Herlihy at 508-790-7039 and/or michaela@bfpcc.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 Beacon Financial Planning of Cape Cod, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Beacon Financial Planning of Cape Cod, Inc. is 175372.

Any references to Beacon Financial Planning of Cape Cod, Inc. as a registered investment adviser or its related persons as registered Advisory Representatives does not imply a certain level of skill or training.

MATERIAL CHANGES

Item 2

At least annually, this section will discuss only specific material changes that are made to the Beacon Financial Planning of Cape Cod, Inc. (Beacon) Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

Our last annual amendment occurred on February 5, 2018. Since then, we made the following changes to our Brochure and Brochure Supplements:

July 2018

Item 4

- Beacon, a state-registered Investment Adviser from April 2015 to July 2018, filed for registration with the Securities and Exchange Commission in June 2018.
- We offer combined wealth management services consisting of financial planning/consulting services and discretionary asset management services. We will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you.
- We will actively manage your account on a continuous and ongoing basis. Your portfolio
 may be similarly managed and contain similar holdings as compared to other clients'
 managed accounts.
- We offer prospective clients an initial free, no-obligation discovery telephone call to introduce Beacon's services and fees.
- Beacon no longer offers stand-alone financial planning services or non-discretionary asset management services.
- We revised the amount of client assets under our wealth management services.

Item 5

- The minimum account size to obtain our wealth management services was revised to \$250,000. Accounts below these minimums may be accepted on an individual basis at our discretion.
- New clients who participate in at least two initial meetings and receive our financial planning recommendations and a proposed asset allocation, and for whatever reason decide not to continue a relationship with Beacon, will be billed a flat fee of \$1,500 for the work completed to date.
- Our fee for educational workshops is a flat fee of \$1500.

Item 7

 The minimum account size to obtain our wealth management services was revised to \$250,000. Accounts below this minimum may be accepted on an individual basis at our discretion.

Item 18

• Beacon will not require you to prepay more than \$1,200 and six or more months in advance of receiving the advisory service.

Item 19

• Beacon is no longer state registered and this section is no longer applicable. Beacon is registered with the Securities and Exchange Commission.

A copy of our updated Brochure and Brochure Supplements is available to you free of charge and may be requested by contacting us at 508-790-7039 and/or michaela@bfpcc.com. Our Brochure may also be obtained from our website at www.beaconfinancialplanningcapecod.com.

Additional information about Beacon Financial Planning of Cape Cod, Inc. is also available via the SEC's website www.adviserinfo.sec.gov. The IARD number for Beacon Financial Planning of Cape Cod, Inc. is 175372. The SEC's website also provides information about any persons affiliated with Beacon Financial Planning of Cape Cod, Inc. who are registered, or are required to be registered, as Advisory Representatives of Beacon Financial Planning of Cape Cod, Inc.

TABLE OF CONTENTS

Item 3

COVER PAGE Item 1]
MATERIAL CHANGES Item 2	2
TABLE OF CONTENTS Item 3	2
ADVISORY BUSINESS Item 4	5
FEES AND COMPENSATION Item 5	9
PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT Item 6	. 10
TYPES OF CLIENTS Item 7	
METHODS of ANALYSIS, INVESTMENT STRATEGIES and RISK of LOSS	. 11
DISCIPLINARY INFORMATION Item 9	
OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS Item 10	. 11
CODE of ETHICS, PARTICIPATION or INTEREST in CLIENT TRANSACTIONS and	
PERSONAL TRADING Item 11.	
BROKERAGE PRACTICES Item 12	
REVIEW of ACCOUNTS Item 13	
CLIENT REFERRALS and OTHER COMPENSATION Item 14	
CUSTODY Item 15	
INVESTMENT DISCRETION Item 16	
VOTING CLIENT SECURITIES Item 17	
FINANCIAL INFORMATION Item 18	
REQUIREMENTS for STATE REGISTERED ADVISERS Item 19	. 17
Brochure Supplements	

ADVISORY BUSINESS

Item 4

Beacon Financial Planning of Cape Cod, Inc. (hereinafter referred to as "Beacon") offers a fee-only wealth management service consisting of comprehensive, fundamental, long-term financial planning as well as asset management services.

A. Beacon is a corporation formed under the laws of the State of Massachusetts in 2015 and filed for investment adviser registration with the State of Massachusetts in March 2015. Beacon filed for registration with the Securities and Exchange Commission in July 2018. Michaela G. Herlihy, CRD number 5309597, is the principal owner, President, Chief Compliance Officer and Advisory Representative. Michaela has been in the financial services industry since 2005. Additional business information about Michaela is disclosed on the Supplemental Brochure attached to this Brochure

- B. Beacon offers wealth management services comprised of:
 - Combined Asset Management and Financial Planning/Consulting Services
 - Financial Education Seminars.

A description of our services appears below.

Wealth Management Services

We offer an ongoing blending of financial planning and asset management services focusing holistically on a client's unique needs. An initial free, no-obligation discovery telephone call is offered to introduce Beacon's services and fees. Once there is mutual agreement on fit and desire to work together, we will request a number of documents to help understand your overall financial situation.

Beacon will gather financial information and history from you such as your retirement and financial goals, investment objectives, investment horizon, financial needs, cash flow analysis, cost of living needs, education needs, savings tendencies, and other applicable financial information to provide the investment advisory services requested. All information gathered from you is confidential.

Beacon will prepare a written financial plan and present the analysis of your situation along with our recommendations for steps to be taken to assist you to work toward your financial goals.

The Plan is based on your financial situation at the time and on the financial information you disclosed to our Advisory Representative. You need to be aware that certain assumptions may be made with respect to interest and inflation rates as well as the use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. Beacon cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. You must notify your Advisory Representatives promptly of any changes to your financial goals, objectives or financial situation as such changes may require your Advisory Representatives to review your plan and make amendments. Based on your specific needs or situation, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

In addition to providing you with financial planning recommendations, we customize a portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives. Your Advisory Representative will schedule a meeting with you and present the recommended portfolio. Upon your approval, we will implement the initial portfolio allocation. Beacon will manage your account on a continuous and ongoing basis.

We offer this service on a discretionary basis. With your written approval, as indicated in the advisory agreement, we will use our own discretion to determine any changes to the account. Beacon will monitor the account and will make changes to the allocation as deemed appropriate by the firm and your Advisory Representative. We will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you.

Depending on your specific goals and objectives, we will generally hold positions in your account for a long term, even more than a year, or we may recommend actively trading some securities, holding such positions for periods of 30 days or fewer. Your portfolio may be similarly managed and contain similar holdings as compared to other clients' managed accounts.

Our Advisory Representatives primarily use open-ended mutual funds including no-load and load waived or mutual funds purchased at net asset value (NAV). However, managed accounts are not exclusively limited to mutual funds and may include stocks and bonds, certificates of deposits, government securities, exchange traded funds (ETFs), money markets, annuities, direct participation programs and REITs.

Transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

As further described below, Beacon has entered into a relationship to offer you brokerage and custodial services through Schwab Advisor ServicesTM of Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer, member SIPC. There is no affiliation between Beacon and Schwab.

Financial Education Seminars

Our Advisory Representatives may conduct financial education seminars on topics such as estate planning, investment strategies, and retirement needs. We may partner with attorneys and other professionals to offer these seminars. Seminar participants may subsequently choose to participate in a complimentary initial consultation with us. The consultation will consist of a general review of your financial situation, issues, and concerns. We will also explain the services we offer.

C. We tailor the advisory services we offer to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities. We will ask you to complete a client information fact sheet and investment guidelines questionnaire to assist us with obtaining information about your financial situation and history. Additionally, one or more of our Advisory Representatives will meet with you and conduct an interview and data gathering session to continue the due diligence process. The information gathered by Beacon will assist the firm in providing you with the requested services and customize the services to your financial situation.

Depending on the services you have requested, we will gather various financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Existing portfolio statements, including retirement account information
- Financial needs
- Tax bracket information
- Cash flow analysis
- Cost of living needs
- Savings tendencies
- Other applicable financial information required by our Advisory Representative in order to provide the investment advisory services you have requested.
- D. Beacon does not participate in any wrap fee programs.
- E. As of June 26, 2018, we have approximately \$139.3 million of discretionary client assets under management.

General Information

The investment recommendations and advice offered by Beacon and your Advisory Representative are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. Our primary goal is to help our clients identify and pursue their financial goals, thereby enhancing the overall quality of their lives.

IRA Rollover Considerations

As part of our consulting and advisory services, we may provide you with recommendations and advice concerning your employer retirement plan or other qualified retirement account. We may recommend that you withdraw the assets from your employer's retirement plan or other qualified retirement account and roll the assets over to an individual retirement account ("IRA") which we will manage. If you elect to roll the assets to an IRA under our management, we will charge you an asset-based fee as described in Item 5. This practice presents a conflict of interest because our investment advisory representatives have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have your IRA assets managed by us.

Employers may permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leave the funds in your employer's (former employer's) plan.

- 2. Roll over the funds to a new employer's retirement plan.
- 3. Cash out and take a taxable distribution from the plan.
- 4. Roll the funds into an IRA rollover account.

Each of these options has advantages and disadvantages. Before making a change, we encourage you to speak with your financial advisor, CPA and/or tax attorney.

Before rolling over your retirement funds to an IRA for us to manage, carefully consider the following. NOTE: This list is not exhaustive.

- 1. Determine whether the investment options in your employer's retirement plan address your needs or whether other types of investments are needed.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public such as employer securities or previously closed funds.
- 2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services available through an IRA provider and their potential costs.
 - c. It is likely you will not be charged a management fee and will not receive ongoing asset management services unless you elect to have such services. If your plan offers management services, there may be a fee associated with the service that is more or less than our asset management fee.
- 3. Our strategy may have higher risk than the option(s) provided to you in your plan.
- 4. Your current plan may offer financial advice, guidance, management, and/or portfolio options at no additional cost.
- 5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age $70.5 (70 \frac{1}{2})$.
- 6. Your 401k may offer more liability protection than a rollover IRA; each state may vary. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies; however, there can be exceptions. Consult an attorney if you are concerned about protecting your retirement plan assets from creditors.
- 7. You may be able to take out a loan on your 401k, but not from an IRA.
- 8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses, or a home purchase.
- 9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
- 10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand your options, their features and differences and decide whether a rollover is best for you. If you have questions, contact us at our main number listed on the cover page of this brochure.

FEES AND COMPENSATION

Item 5

A. Wealth Management fees are negotiable and are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds in your account.

New clients who participate in at least two initial meetings and receive our financial planning recommendations and a proposed asset allocation, and for whatever reason decide not to continue a relationship with Beacon, will be billed a flat fee of \$1,500 for the work completed to date.

Our Wealth Management Fee Schedule is as follows:

Account Size	Maximum Annual Fee
Up to \$500,000	1.00%
\$500,001 to \$1,000,000	0.80%
\$1,000,001 to \$5,000,000	0.60%
\$5,000,001 to \$10,000,000	0.50%
\$10,000,001 and above	0.40%

The minimum account size to obtain our Wealth Management services is generally \$250,000 for accounts. Accounts below these minimums may be accepted on an individual basis at our discretion.

Fee calculation example for a \$3.8 million dollar account:

 \triangleright Quarterly Fee is \$5,700: \$3,800,000 x 0.60% = \$22,800 divided by 4.

Beacon may change the above fee schedule with your authorization on 30-days prior written notice to you.

We sometimes make exceptions to our general fee schedule under certain circumstances (e.g., responsibilities involved; accounts or groups of accounts which are expected to have significant capital additions in the future; anticipated future earning capacity; related accounts; account composition; pre-existing client; account retention; pro bono activities, etc.). In such cases, lower or higher fees or different payment arrangements can be negotiated with each client separately and will be described in the client's advisory agreement.

You may make additions to the account or withdrawals from the account. No fee adjustments will be made for additional deposits, partial withdrawals or for account appreciation or depreciation.

Lower fees for comparable services may be available from other sources.

B. If the account is established or closed during the middle of a month, you will pay a pro-rated portion of the advisory fee based upon the number of days the account was under Beacon's management. You may either elect to have us bill you each quarter for your Wealth Management fees or you may authorize us to deduct the fee directly from your account. You will need to grant Beacon the authorization to debit your fee. If the fees are deducted directly from an account, Beacon will send you a quarterly fee notice showing the amount of the fee to be deducted. In addition,

Schwab will provide you with a quarterly statement that lists the total fees deducted from the account as well as all transactions that were conducted in the account that quarter.

- C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. You may also pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the account. These fees are not charged by Beacon and are charged by the product sponsor or account custodian. Beacon does not share in any portion of these fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. These advisory fees are not shared with Beacon and are compensation to the fund manager. You should read the mutual fund prospectus prior to investing.
- D. The Wealth Management fee is billed in arrears quarterly. Fees will be based on the value of the account on the last business day of the calendar quarter of each year. If your account does not contain sufficient funds to pay the advisory fees, we have the limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. Except for ERISA and IRA accounts, you may reimburse your account for advisory fees paid to Beacon.

Termination Provisions

You may terminate investment advisory services obtained from Beacon, without penalty, upon verbal or written notice within five (5) business days after entering into the advisory agreement with Beacon. You will, however, be responsible for any fees and charges incurred from third parties as a result of maintaining the account, such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, you may terminate investment advisory services with verbal or written notice to Beacon. If you terminate investment advisory services during a quarter, you will be charged a pro-rata portion of the advisory fee for the quarter up to the date of termination.

Financial Education Seminars

We may impose a flat fee of \$1500 for educational workshops. Generally, the employer, civic or non-profit group sponsoring the workshop will pay any fees charged by us.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT Item 6

This section is not applicable to Beacon because Beacon does not charge performance-based fees.

TYPES OF CLIENTS Item 7

Beacon's services are geared toward high-net-worth individuals and non-high-net-worth individuals, trusts and estates, pension and profit sharing plans, corporations and charitable organizations.

The minimum account size to obtain our Wealth Management services is generally \$250,000 for accounts. Accounts below these minimums may be accepted on an individual basis at our discretion. Such circumstances may include, but not be limited to, (1) additional assets will soon be deposited, or (2) the client has other accounts with BFPCC. You should be aware that performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being

compromised. Performance of smaller accounts may vary from the performance of accounts with more dollars invested because fluctuations in the market may affect smaller accounts more.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS Item 8

- A. Beacon conducts economic analysis and attempts to analyze and determine economic trends. Additionally, Beacon uses Modern Portfolio Theory and asset allocation. Modern Portfolio Theory is a theory of investing which attempts to maximize a portfolio's expected return based on a given amount of portfolio risk by carefully choosing the appropriate amount of various assets.
- B. You need to understand that investing in securities involves risk of loss, including the potential loss of the principal money you are investing. Therefore, your participation in the Wealth Management program offered by Beacon requires you to be prepared to bear the risk of loss as well as the fluctuating performance of your accounts. Market values of investments will always fluctuate based on market conditions.

We do not represent, warrantee, or imply that the services or methods of analysis we use can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Beacon or our Advisory Representatives will provide a better return than other investment strategies.

C. As stated above in Item 5, Beacon primarily uses mutual funds in client portfolios. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers and/or the fund straying from its stated investment objective. Open-ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's website. At the client's request at any time Beacon will direct the client to the appropriate Web page to access the prospectus.

DISCIPLINARY INFORMATION

Item 9

There is no reportable disciplinary information for Beacon or its management persons.

For Massachusetts Residents:

Massachusetts law requires disclosure that information on disciplinary history of Beacon and its representatives may be obtained by contacting the Massachusetts Securities Division at (617) 727-3548. No disciplinary history exists for Beacon and/or its owner or employees.

OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS Item 10

A., B. Beacon does not have a related person who is a: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, futures commission merchant or commodity pool operator; banking or thrift institution; accounting firm; law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

C. Neither Beacon nor its management persons have a relationship with any of the following entities: broker/dealer, municipal securities dealer, or government securities broker/dealer, investment company or other pooled investment vehicle, futures commission merchant, commodity pool operator or commodity trading advisor, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor syndicator of limited partnerships.

Beacon has an affiliated company, Beacon Financial Planning, Inc., (BFP), a Massachusetts registered investment adviser (CRD number 128757). Walter Herlihy, father of Michaela Herlihy who is President of Beacon, is the President and majority owner of BFP. Walter is a minority owner (1%) of Beacon and Michaela is a minority owner (1%) of BFP. Each are registered as Advisory Representatives with Beacon and BFP.

D. Beacon does not currently recommend the services of Third-Party Managers.

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

Code of Ethics

- A. Beacon has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Beacon takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as our policies and procedures. Further, we strive to handle your non-public information in such a way to protect information from falling into the hands of anyone who has no business reason to know such information. We provide you with our Privacy Policy which details our procedures for handling your personal information. Beacon maintains a code of ethics for its Advisory Representatives, supervised persons and office staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, our Code of Ethics establishes our firm's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.
- B. Neither Beacon nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. Beacon and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, Beacon and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. They will not put their interests before your interest. Neither Beacon nor any associated person may trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.
- D. Beacon is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. Beacon and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

BROKERAGE PRACTICES

Item 12

A. Your assets must be maintained in an account at a qualified custodian and we recommend that our clients use Charles Schwab & Co., Inc. (Schwab). You will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We will assist you with the paperwork but we do not open the account for you. If you do not wish to place your assets with Schwab, then you cannot participate in our Wealth Management service. Not all advisers require their clients to use a particular broker-dealer or other custodian selected by the adviser.

How We Select Brokers/Custodians

We seek to use a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- o combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- o capability to execute, clear and settle trades (buy and sell securities for your account)
- o capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- o breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- o availability of investment research and tools that assist us in making investment decisions
- o quality of services
- o competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- o reputation, financial strength and stability of the provider
- o their prior service to us and our other clients
- o availability of other products and services that benefit us, as discussed below (see "Products and Services Available to Us from Schwab").

Your Custody and Brokerage Costs

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates and asset-based fees on trades applicable to our client accounts were negotiated based on our commitment to maintain \$10 million of our clients' assets statement equity in accounts at Schwab. This commitment benefits you because the overall commission rates and asset-based fees on trades that you pay are lower than they would be if we had not made the commitment

Products and Services Available to Us from Schwab

Schwab Advisor Services is Schwab's business serving independent investment advisory firms like us. Schwab provides Beacon and our clients with access to its institutional brokerage - trading, custody, reporting and related services – many of which are typically not available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us

manage or administer our clients' accounts while others help us manage and grow our business. Here is a more detailed description of Schwab's support services:

Services that Benefit You. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You. Schwab makes available to Beacon other products and services that benefit Beacon but may not directly benefit you or your account. These other products and services assist Beacon in managing and administering your accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to your account data (such as duplicate trade confirmations and account statements
- o facilitate trade execution and allocation of aggregated trade orders for multiple client accounts
- o provide pricing and other market data
- o facilitate payment of our fees from your accounts; and
- o assist us with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- o educational conferences and events
- o technology, compliance, legal, and business consulting
- o publications and conferences on practice management and business succession, and
- o access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

Schwab provides Beacon with a discount on PortfolioCenter® service, a software solution provided by Schwab Performance Technologies®.

Many of these services generally may be used to service all or a substantial number of our client accounts.

These services generally are available to independent investment advisers on an unsolicited basis, at no charge so long as a total of at least \$10 million of Beacon's clients' assets are maintained in accounts at Schwab. There is no other contingency upon Beacon committing to Schwab any specific amount of business (assets in custody or trading). Schwab's services include brokerage, custody,

research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. As a fiduciary, Beacon endeavors to act in your best interests; our recommendation that you maintain your assets in accounts at Schwab may be based in part on the benefit to Beacon of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services.

From time-to-time Beacon may make an error in submitting a trade order on your behalf. When this occurs, we will place a correcting trade with Schwab. If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and you decide to forego the gain (e.g., due to tax reasons). If the gain does not remain in your account, Schwab will donate the amount of any gain \$100 and over to charity. If a loss occurs greater than \$100, Beacon will pay for the loss. Schwab will maintain the loss or gain (if such gain is not retained in your account) if it is under \$100 to minimize and offset its administrative time and expense. Generally, if related trade errors result in both gains and losses in your account, they may be netted.

B. Due to the individual management of client accounts, we do not aggregate the purchase or sale of securities for various client accounts.

REVIEW of ACCOUNTS

Item 13

- A. While the underlying securities within Wealth Management Services accounts are continuously monitored, individual client accounts are typically reviewed semi-annually. We will attempt to contact you at least annually or as agreed by you and your Advisory Representative. Accounts will be reviewed semi-annually unless otherwise requested by the client. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require your Advisory Representative to review the potfolio allocation and make recommendations for changes. Financial plans will be reviewed periodically as needed, as the result of qualifying events or at the request of a client. Reviews are conducted by Advisory Representatives.
- B. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.
- C. You will be provided statements at least quarterly direct from Schwab, the account custodian. Additionally, you will receive confirmations of all transactions occuring direct from Schwab. Beacon may provide you an annual or more frequent performance report, depending on the services you request. You should compare our reports with statements received direct from Schwab. Should there be any discrepancy Schwab's report will prevail.

Beacon recommends you have at least an annual review and update to any financial plans and we will reach out to you every six months to schedule a review. However, other than the initial plan or analysis, there will be no other reports issued.

CLIENT REFERRALS AND OTHER COMPENSATION

A. Product vendors recommended by Beacon may provide monetary and non-monetary assistance with client events, provide educational tools and resources. We do not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. Beacon's due diligence of a product does not take into consideration any assistance it may receive.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisers that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

B. Beacon does not directly or indirectly compensate any person who is not a supervised person of our firm for referrals.

CUSTODY Item 15

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct your custodian to deduct our advisory fees directly from your account. However, Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. As noted under Item 13C above, you should compare the portfolio allocation reports we provide you with your Schwab statement.

INVESTMENT DISCRETION

Item 16

Item 14

You may grant Beacon authorization to manage your account on a discretionary basis. You will grant such authority to Beacon by execution of the advisory agreement. You may terminate the discretionary authorization at any time by giving us written notice.

Additionally, you are advised that:

- 1. You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations.
- 2. Your written consent is required to establish any mutual fund, variable annuity, or brokerage account.

VOTING CLIENT SECURITIES

Item 17

Beacon does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact your Advisory Representative about questions you may have and opinions on how to vote the proxies. However, the decision to vote and how you vote the proxies is solely up to you.

FINANCIAL INFORMATION

Item 18

- A. Beacon will not require you to prepay more than \$1200 and six or more months in advance of receiving the advisory service; therefore, a balance sheet is not required to be attached.
- B. Beacon is financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.
- C. Neither Beacon nor its Advisory Representatives have ever been the subject of a bankruptcy petition.

REQUIREMENTS FOR STATE REGISTERED ADVISERS

Item 19

This section is not applicable as Beacon is registered with the Securities and Exchange Commission.

Beacon Financial Planning of Cape Cod, Inc. 72 Pine Street

Hyannis, MA 02601 Phone: 508-790-7039

Fax: 617-334-7967

www.beaconfinancialplanningcapecod.com

Michaela Herlihy

July 11, 2018

Form ADV Part 2B Brochure Supplement

This brochure supplement provides information about Michaela Herlihy that supplements the Beacon Financial Planning of Cape Cod, Inc. brochure. You should have received a copy of that brochure. Please contact Michaela Herlihy at 508-790-7039 if you did not receive the Beacon Financial Planning of Cape Cod, Inc. brochure or if you have any questions about the contents of this supplement.

Additional information about Michaela Herlihy is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Michaela Herlihy is 5309597.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE Item 2

Michaela Herlihy, CFP®

Year of Birth: 1981

Education:

Name of School	Years	Year	Degree	Major
	Attended	Graduated		
Boise State University	2002–2005	2005	BA	English Writing
Boston University	2005–2008	2008	Certification	CERTIFIED FINANCIAL PLANNER™*

* CERTIFIED FINANCIAL PLANNER[™], CFP®

CERTIFIED FINANCIAL PLANNER $^{\text{TM}}$, CFP $^{\text{®}}$ and federally registered CFP (with flame design) marks (collectively, the "CFP $^{\text{®}}$ marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least 3 years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education Complete 30 hours of continuing education hours every 2 years, including 2 hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary

standard of care. This means $CFP^{@}$ professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Beacon Financial Planning of Cape Cod, Inc.	Investment Adviser	President/CCO Advisory Representative	03/2015 to Present
Beacon Financial Planning, Inc.	Investment Adviser	Advisory Representative	05/2012 to Present
Michael A. Schreiber & Associates	Investment Adviser	Advisory Representative Assistant	11/2009 to 05/2012 08/2006 to 11/2009
LPL Financial Corporation	Broker/Dealer / Investment Adviser	Registered Representative	09/2009 to 05/2012
Mutual Service Corporation	Broker/Dealer / Investment Adviser	Registered Representative	04/2007 to 09/2009
Beacon Financial Planning, Inc.	Investment Adviser	Assistant	06/2005 to 07/2006
Boise State University	Educational Institution	Student	08/2002 to 05/2005

DISCIPLINARY INFORMATION

Item 3

Michaela Herlihy is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of her or the services offered by her.

OTHER BUSINESS ACTIVITES

Item 4

In addition to serving as President and Advisory Representative for Beacon Financial Planning of Cape Cod, Inc. (hereinafter referred to as "Beacon"), Michaela is also an Advisory Representative with Beacon Financial Planning, Inc., a related investment advisory firm. This accounts for approximately 1% of her time.

ADDITIONAL COMPENSATION

Item 5

Michaela Herlihy does not receive any economic benefit from a non-client for providing advisory services.

SUPERVISION Item 6

Michaela Herlihy, President and Chief Compliance Officer, supervises all activities conducted through Beacon Financial Planning of Cape Cod, Inc. She maintains policies and procedures to guide her activities and adheres to a Code of Ethics. Michaela can be reached at 508-790-7039.

REQUIREMENTS FOR STATE REGISTERED ADVISERS

Item 7

This section is not applicable as Beacon is registered with the Securities and Exchange Commission.

Beacon Financial Planning of Cape Cod, Inc. 72 Pine Street

Hyannis, MA 02601 Phone: 508-790-7039

Fax: 617-334-7967

Walter Herlihy

45 Bristol Drive, Suite 101 South Easton, MA 02375

Phone: 508-230-3588 Fax: 508-230-3633

www.beaconfinancialplanningcapecod.com

July 11, 2018

Form ADV Part 2B Brochure Supplement

This brochure supplement provides information about Walter Herlihy that supplements the Beacon Financial Planning of Cape Cod, Inc. brochure. You should have received a copy of that brochure. Please contact Michaela Herlihy at 508-790-7039 if you did not receive the Beacon Financial Planning of Cape Cod, Inc. brochure or if you have any questions about the contents of this supplement.

Additional information about Walter Herlihy is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Walter Herlihy is 1190239.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE Item 2

Walter Herlihy, CFP®, ChFC®, CLU®

Year of Birth: 1944

Education:

Name of School	Years Attended	Year Graduated	Degree	Major
Stonehill College	1963–1969	1969	BA	Philosophy
The American College	1983–1989	1989	Designation	Chartered Life Underwriter (CLU®)*
The American College	1983–1990	1990	Designation	Chartered Financial Consultant (ChFC®)**
College for Financial Planning	2011–2011	2011	Designation	CERTIFIED FINANCIAL PLANNER [™] (CFP [®])***

* Chartered Life Underwriter (CLU®)

The American College issues this designation of insurance expertise. Candidates must satisfy comprehensive core of five courses supplemented by a selection of three elective courses to customize based on specific needs or interests. Candidates must have 3 years of full-time business experience within the 5 years preceding the award of the designation. Candidates must pass a final exam, and complete 30 hours of continuing education and ethics requirements every 2 years.

** Chartered Financial Consultant (ChFC®)

The American College issues this designation that covers financial planning disciplines including insurance, income taxation, retirement planning, investments and estate planning. Candidates must have 3 years of full-time business experience within the 5 years preceding the award of the designation. Candidates must complete six core and two elective courses, pass a final exam, and complete 30 hours of continuing education requirements every 2 years.

*** The CERTIFIED FINANCIAL PLANNER™, CFP®

CERTIFIED FINANCIAL PLANNER^{$^{\text{TM}}$} (CFP^{$^{\text{R}}$}) and federally registered CFP (with flame design) marks (collectively, the "CFP^{$^{\text{R}}$} marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the $CFP^{@}$ marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least 3 years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education Complete 30 hours of continuing education hours every 2 years, including 2 hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP[®] professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP[®] certification

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Beacon Financial Planning of Cape Cod, Inc.	Investment Adviser	Advisory Representative	03/2015 to Present
Beacon Financial Planning, Inc.	Investment Adviser	President/ Advisory Representative	02/2005 to Present
Bristol Investment Management & Retirement Planning Company	Investment Adviser	Sole Proprietor	01/1994 to 08/2005
Commonwealth Equity Services, Inc.	Broker Dealer	Registered Representative	09/1993 to 02/2005

DISCIPLINARY INFORMATION

Item 3

Walter Herlihy is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

OTHER BUSINESS ACTIVITES

Item 4

In addition to his role as an Advisory Representative for Beacon Financial Planning of Cape Cod, Inc., Walter Herlihy is also the President and an Advisory Representative with Beacon Financial Planning, Inc., a related investment advisory firm. This accounts for approximately 99% of his time.

ADDITIONAL COMPENSATION

Item 5

Walter Herlihy does not receive any economic benefit from a non-client.for providing advisory services.

SUPERVISION Item 6

Walter Herlihy is an Advisory Representative of Beacon Financial Planning of Cape Cod, Inc. (hereinafter referred to as "Beacon"). Michaela Herlihy, President and Chief Compliance Officer of Beacon, is responsible for supervision and oversight of the activities conducted through Beacon. Michaela can be reached at 508-790-7039.

Michaela Herlihy reviews transactions conducted in clients' accounts. Additionally, all account information required to establish an account for a client must flow through Michaela. Ms. Herlihy and Beacon have procedures in place to be aware of any outside business activities engaged in by Walter, oversee communications with the public, and review personal trading activities of Walter Herlihy as well as in any account over which he has direct or indirect beneficial interest.

REQUIREMENTS FOR STATE REGISTERED ADVISERS

Item 7

This section is not applicable as Beacon is registered with the Securities and Exchange Commission.

Beacon Financial Planning of Cape Cod, Inc. 72 Pine Street Hyannis, MA 02601

Phone: 508-790-7039 Fax: 617-334-7967

Linda Gadkowski

www.beaconfinancialplanningcapecod.com

July 11, 2018

Form ADV Part 2B Brochure Supplement

This brochure supplement provides information about Linda Gadkowski that supplements the Beacon Financial Planning of Cape Cod, Inc. brochure. You should have received a copy of that brochure. Please contact Michaela Herlihy at 508-790-7039 if you did not receive the Beacon Financial Planning of Cape Cod, Inc. brochure or if you have any questions about the contents of this supplement.

Additional information about Linda Gadkowski is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Linda Gadkowski is 4720136.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE Item 2

Linda Gadkowski, CFP®

Year of Birth: 1944

Education:

Name of School	Years Attended	Year	Degree	Major
		Graduated		
State University College Cortland New York	1962–1966	1966	BS	Education
Temple University	1966–1968	1968	Masters	Education
College for Financial Planning	1990–1992	1992	Designation	CERTIFIED FINANCIAL PLANNER™ (CFP®)*

* CERTIFIED FINANCIAL PLANNERTM, CFP[®]

CERTIFIED FINANCIAL PLANNER[™], CFP[®] and federally registered CFP (with flame design) marks (collectively, the "CFP[®] marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- Experience Complete at least 3 years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

• Continuing Education – Complete 30 hours of continuing education hours every 2 years, including 2 hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

• Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Background:

Name of	Type of Business	Title	Period of
Employer			Employment
Beacon Financial Planning, Inc.	Investment Adviser	Advisory Representative President	05/1990 to Present 05/1990 to 02/2005
Beacon Financial Planning of Cape Cod, Inc.	Investment Adviser	Advisory Representative	03/2015 to Present

DISCIPLINARY INFORMATION

Item 3

Linda Gadkowski is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of her or the services offered by her.

OTHER BUSINESS ACTIVITES

Item 4

In addition to her role as an Advisory Representative for Beacon Financial Planning of Cape Cod, Inc., Linda Gadkowski is also an Advisory Representative with Beacon Financial Planning, Inc., a related investment advisory firm. This accounts for approximately 1% of her time.

ADDITIONAL COMPENSATION

Item 5

Linda Gadkowski does not receive any economic benefit from a non-client for providing advisory services.

SUPERVISION Item 6

Linda Gadkowski is an Advisory Representative of Beacon Financial Planning of Cape Cod, Inc. (hereinafter referred to as "Beacon"). Michaela Herlihy, President and Chief Compliance Officer of Beacon, is responsible for supervision and oversight of the activities conducted through Beacon. Michaela can be reached at 508-790-7039.

Michaela Herlihy reviews transactions conducted in clients' accounts. Additionally, all account information required to establish an account for a client must flow through Michaela. Ms. Herlihy and Beacon have procedures in place to be aware of any outside business activities engaged in by

Linda Gadkowski, oversee communications with the public, and review personal trading activities of Linda as well as in any account over which she has direct or indirect beneficial interest.

REQUIREMENTS FOR STATE REGISTERED ADVISERS

Item 7

This section is not applicable as Beacon is registered with the Securities and Exchange Commission.