

FIRM DISCLOSURE BROCHURE



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 info@promontoryfp.com 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.

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 12: Brokerage Practices.....11

Item 13: Review of Accounts.....11

Item 14: Client Referrals and Other Compensation.....12

Item 15: Custody.....12

Item 16: Investment Discretion.....12

Item 17: Voting Client Securities.....12

Item 18: Financial Information.....12

Item 19: Requirements for State-Registered Advisers.....13

Item 20: Education and Business Background of Members.....15-35

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 Client’s 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.

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 and financial independence
- cash flow and debt management
- tax management
- 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.

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.

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.

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.

Item 9: DISCIPLINARY INFORMATION

Promontory nor any of its 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 www.adviserinfo.sec.gov. 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.

2. Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund). **None**

3. 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.**

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 PERSONAL TRADING

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.

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.

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.

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.



Brochure Supplement Form ADV Part 2B

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 www.adviserinfo.sec.gov.

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.