

Item 1 - Cover Page



Form ADV Part 2A

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www.beyond-wealth.com

February 1, 2024

This Brochure provides information about the qualifications and business practices of Castlebar Asset Management, LLC d/b/a Beyond Wealth (Beyond Wealth). If you have any questions about the contents of this Brochure, please contact us at (913) 871-7980 or hello@beyond-wealth.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.

Beyond Wealth is a registered investment adviser. Registration of an Investment Adviser 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.

Additional information about Beyond Wealth also is available on the SEC's website at www.adviserinfo.sec.gov. Click on the "Investment Adviser Search" link and search "Investment Adviser Firm" using Beyond Wealth's IARD number, 162231.

Beyond Wealth

February 1, 2024

Item 2 – Material Changes

The last annual update of this Brochure was filed on January 31, 2023. Since then, no material changes have been made.

Currently, our Brochure may be requested by contacting Andrew Comstock, Principal at (913) 871-7980 or andrew@beyond-wealth.com.

Additional information about Beyond Wealth is also available via the SEC’s website www.adviserinfo.sec.gov. The SEC’s website also provides information about any persons affiliated with Beyond Wealth who are registered, or are required to be registered, as investment adviser representatives of Beyond Wealth.

Beyond Wealth

February 1, 2024

Item 3 -Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	5
Item 6 – Performance-Based Fees and Side-By-Side Management	6
Item 7 – Types of Clients	6
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9 – Disciplinary Information	8
Item 10 – Other Financial Industry Activities and Affiliations	8
Item 11 – Code of Ethics	8
Item 12 – Brokerage Practices	10
Item 13 – Review of Accounts	11
Item 14 – Client Referrals and Other Compensation	11
Item 15 – Custody	11
Item 16 – Investment Discretion	12
Item 17 – Voting Client Securities	12
Item 18 – Financial Information	12
Item 19 – Requirements for State-Registered Advisers	12
Brochure Supplement(s)	

Beyond Wealth

February 1, 2024

Item 4 – Advisory Business

Castlebar Asset Management, LLC d/b/a Beyond Wealth is a limited liability company. Beyond Wealth was founded in 2012 and is owned by Andrew Comstock and Brandy Branstetter.

Comprehensive Financial Planning with Investment Management: Beyond Wealth offers the following services only as a comprehensive bundle.

- **Investment Management:** Beyond Wealth develops an investment strategy to meet our client's goals and objectives. The investment strategies are created based on conversations with our clients about their goals, objectives and current financial position. Beyond Wealth's strategies include equities, fixed income, derivatives, alternative investments and currency management. These strategies can be implemented using individual securities, exchange traded funds (ETFs) or mutual funds based on cost effectiveness. In addition, Beyond Wealth offers a Socially Responsible Investment (SRI) approach where we will screen companies to make sure they meet certain social requirements. This typically excludes tobacco, defense, firearms, and gaming businesses. Currently, SRI equity accounts are managed in our Sub-Advisory relationships, but this strategy is available to Advisory clients as well.

Clients are able to impose restrictions on their portfolios if they choose. Each client portfolio is unique and they are able to remove any asset class they chose from their portfolio.

- **Financial Planning:** Beyond Wealth offers comprehensive financial planning services. This includes: financial goal planning, cash flow planning, investment analysis and risk review, retirement analysis, debt management, insurance analysis, education planning and employee benefits analysis.

Sub Advisory: We offer investment management services to other Registered Investment Advisory firms. This is currently our SRI equity management.

Retirement Plan Services: Beyond Wealth also provides retirement plan consulting services to assist businesses with administration of their defined benefit and defined contribution retirement plans. In these engagements, we may provide discretionary management services, non-discretionary management services, or non-management advisory/consulting services, depending on the needs of the plan. In a discretionary management engagement, Beyond Wealth would be responsible for making decisions and acting upon those decisions on behalf of the plan. In a non-discretionary management engagement, Beyond Wealth would be responsible for making changes for a plan upon a client's approval. In an advisory/consulting engagement, Beyond Wealth would serve in an advisory capacity where the client retains control for implementation of all recommendations and other actions.

Beyond Wealth does not participate in a wrap fee program.

Beyond Wealth

February 1, 2024

Beyond Wealth has \$88,367,147 of discretionary assets under management on December 31, 2023.

Item 5 – Fees and Compensation

Advisory Fees: Our basic fee structure is to charge an annual management fee on the custodian's quarter end balance and paid quarterly in arrears.

Comprehensive Financial Planning with Investment Management Fees: Fees for comprehensive financial planning with Investment Management services include the engagement fee of \$3,500 plus an ongoing annual fee (see the table below) which is paid in quarterly installments. The engagement fee is invoiced and due at the start of the advisory relationship. The fee for the Comprehensive Financial Planning with Investment Management service is based on the market value of assets under advisement. The minimum ongoing fee for Comprehensive Financial Planning with Investment Management Services is \$4,000 per year charged quarterly (\$1,000/quarter). Clients who engaged Beyond Wealth before August 15, 2022 will continue with their prior fee schedules until a new agreement is signed. The fee may be negotiable in certain cases.

Ongoing Annual Fees:

First \$250,000: 1.25%
Next \$750,000: 1.00%
Next \$2 million: 0.75%
Next \$2 million: 0.65%
Over \$5 million: 0.50%

As an example, the annualized fee for managing \$6,000,000 of a portfolio would be 1.25% applied to the first \$250,000, plus 1.0% applied to the next \$750,000, plus .75% applied to the next \$2,000,000, plus .65% applied to the next \$2,000,000 plus .5% applied to the next \$1,000,000.

The specific manner in which fees are charged by Beyond Wealth is established in a client's written agreement with Beyond Wealth. Clients are billed in arrears each calendar quarter. Clients may also elect to be billed directly for fees or to authorize Beyond Wealth to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any earned unpaid fees will be due and payable. Investment Management Fees are negotiable

Sub-Advisory Fees: Beyond Wealth may act as a Sub-Advisor to other registered investment advisory firms. Fees are negotiable with our Sub-Advisory clients. Currently we earn 0.75% for Sub-Advisory management fees based on assets under management. This is the current arrangement we have with Harrington Investments, a SEC Registered Investment Advisor. Sub-Advisory Fees are negotiable.

Retirement Plan Services: Fees charged for retirement plan services may be charged in advance or in arrears depending on the service provided. Fees may be fixed or asset based (not to exceed 1.25%

Beyond Wealth

February 1, 2024

annually), and are negotiable depending on the complexity of the service. Fee levels (whether fixed or asset based) are primarily based on actual services to be provided. Fees may be deducted directly from client accounts on a quarterly basis, or clients may elect to alternatively pay fees by check or wire transfer. Services may be terminated at any time by either party with 30 days written notice to the other party, and fees will be prorated accordingly. All retirement plan fees paid to Beyond Wealth are separate and unrelated to any fees or expenses assessed by any broker, custodian, or other outside party. Retirement Plan Services fees are negotiable.

Beyond Wealth's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment, and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees, and commissions are exclusive of and in addition to Beyond Wealth's fee, and Beyond Wealth shall not receive any portion of these commissions, fees, and costs.

Beyond Wealth must disclose to a client in writing before entering into or renewing an advisory agreement about any material conflict of interest which could impair Beyond Wealth's ability to offer unbiased and objective advice. Currently, Beyond Wealth does not have any of these disclosures.

Item 12 further describes the factors that Beyond Wealth considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

Item 6 – Performance-Based Fees and Side-By-Side Management

Beyond Wealth does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Beyond Wealth provides financial planning and investment management services to individuals, high net worth individuals, charitable institutions, foundations, and endowments. Beyond Wealth does not have a minimum account size but we do have a minimum annual fee. We ask clients to pay an engagement fee. This is negotiable in certain cases.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Beyond Wealth invests in both the domestic US and international markets. Investing in securities involves risk of loss that clients should be prepared to bear.

Method of Analysis

Beyond Wealth

February 1, 2024

Beyond Wealth has an equity portfolio management philosophy that the lowest risk stocks offer the best return when investing with a multiple year time horizon. Beyond Wealth evaluates stocks using fundamental analysis. This includes looking at past financial statements and making estimates about future revenue and earnings. We evaluate companies by analyzing ratios, margins, return metrics, and relative analysis. Ratio analysis includes using measures like Price to Earnings, Price to Book, Price to Cash Flow, and other industry specific measures. We also use external sources of information from financial data providers to evaluate potential companies.

Beyond Wealth performs fundamental analysis on corporations and governments that issue bonds which we invest in for clients. This includes reviewing the issuers' past financial information and assessing their ability to make coupon payments and repay principal.

Investment Strategy

Beyond Wealth creates a strategic asset allocation based on the client's goals and objectives, risk tolerance, and time horizon outlined in their financial plan. The asset allocation includes exposure to asset classes like Large Cap Stocks, Small Cap Stocks, International Stocks, Commodities, Bonds, etc. Clients' asset allocation is reviewed at least annually.

Equity Risks

Stock market risk is the chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. In addition, investments in foreign stock markets can be riskier than U.S. stock investments. The prices of foreign stocks and the prices of U.S. stocks have, at times, moved in opposite directions.

Currency risk, is the chance that the value of a foreign investment, measured in U.S. dollars, will decrease because of unfavorable changes in currency exchange rates.

Country/regional risk is the chance that world events—such as political upheaval, financial troubles, or natural disasters—will adversely affect the value of securities issued by companies in foreign countries or regions. Beyond Wealth may invest a large portion of its assets in securities of companies located in any one country or region, including emerging markets, Beyond Wealth's performance may be hurt disproportionately by the poor performance of its investments in that area. Country/ regional risk is especially high in emerging markets.

Investment style risk is the chance that returns from the types of stocks in which Beyond Wealth invests will trail returns from the global stock market. As a group, non-U.S. value stocks tend to go through cycles of doing better—or worse—than the global market in general. These periods have, in the past, lasted for as long as several years. Beyond Wealth may invest in small- and mid-capitalization stocks. Historically, these stocks have been more volatile in price than the large-cap stocks that dominate the global market, and they often perform quite differently.

Beyond Wealth

February 1, 2024

Manager risk is the chance that poor security selection or focus on securities in a particular sector, category, or group of companies will cause a client's portfolio to underperform relevant benchmarks or other funds with a similar investment objective.

Fixed Income Risks

Income risk is the chance that a client's portfolio income will decline because of falling interest rates. Income risk is generally moderate for intermediate-term bonds, so investors should expect their annual income to fluctuate accordingly.

Interest rate risk is the chance that bond prices overall will decline because of rising interest rates. Interest rate risk should be moderate for clients who invest in short or intermediate bonds because their prices are less sensitive to interest rate changes than are the prices of long-term bonds.

Credit risk is the chance that a bond issuer will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that bond to decline.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Beyond Wealth or the integrity of Beyond Wealth's management. Beyond Wealth has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Beyond Wealth is not registered as a securities broker-dealer, futures commission merchant, commodity pool operator, or commodity trading adviser.

Beyond Wealth may also offer clients advice or recommendations related to insurance products. Some associated persons of Beyond Wealth are licensed insurance agents and represent various insurance companies. Any insurance product placed through associated persons would generate standard and customary insurance commissions and other compensation, a portion of which may be received by associated persons of Beyond Wealth. While Beyond Wealth will endeavor at all times to put the interest of clients first as part of its fiduciary duty, clients should be aware that the receipt of additional compensation creates a potential conflict of interest, and may affect the judgment of individuals who make recommendations. However, our clients are under no obligation to purchase products recommended by our associated persons or to purchase products through our associated persons. We believe that our recommendations are in the best interests of our clients and are consistent with our clients' needs.

Item 11 – Code of Ethics

Beyond Wealth has adopted the CFA Institute's Code of Ethics and Standards of Practice Handbook ("The Code of Ethics") for all supervised persons of the firm describing its high standard of business

Beyond Wealth

February 1, 2024

conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, and the reporting of certain gifts and business entertainment items and personal securities trading procedures, among other things. All supervised persons at Beyond Wealth must acknowledge the terms of the Code of Ethics annually, or as amended.

Beyond Wealth anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Beyond Wealth has management authority to effect and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Beyond Wealth, its affiliates and/or clients, directly or indirectly, have a position of interest. Beyond Wealth's employees and persons associated with Beyond Wealth are required to follow Beyond Wealth's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors, and employees of Beyond Wealth and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Beyond Wealth's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of the employees of Beyond Wealth 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. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Beyond Wealth's clients. In addition, the Code requires pre-clearance of some transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Beyond Wealth and its clients.

Beyond Wealth's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Andrew Comstock. The CFA Institute's Code of Ethics and Standards of Practice Handbook is available on the CFA Institute's website at www.cfainstitute.com.

It is Beyond Wealth's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Beyond Wealth will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as a broker for both the advisory client and for another person on the other side of the transaction.

Beyond Wealth

February 1, 2024

Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Beyond Wealth has authority provided in the Investment Advisory Agreement to determine, without obtaining specific client consent, the securities to be bought or sold and the amount of securities to be bought or sold in accordance with the client’s investment strategy. Generally, all transactions are executed in accordance with the client’s stated goals and objectives in the investment strategy. Beyond Wealth does not take custody of money or securities in advisory accounts. Beyond Wealth does not have the right to withdraw cash or securities from a client’s account, except by written authority in the investment advisory agreement. The only withdrawal that Beyond Wealth can make is the deduction of advisory fees.

Beyond Wealth does have the authority to use a specific broker/dealer. Unless the client directs otherwise, Beyond Wealth shall generally recommend that investment management accounts be maintained by Schwab Institutional, a division of Charles Schwab & Co, Inc. (Schwab). Factors that Beyond Wealth considers in recommending custodians to clients include their respective financial position, reputation, execution, pricing, and services.

Schwab generally does not charge its advisor clients separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts (i.e., transactions fees are charged by certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions).

Beyond Wealth does not receive any portion of the brokerage commissions, and/or transaction fees charged to clients. Additionally, Beyond Wealth has no control over the commission rate charged by the custodian to transact trades on behalf of the client.

Beyond Wealth has an arrangement with Schwab through which they provide Beyond Wealth with “institutional platform services.” The institutional platform services include, among others, brokerage, custody, and other related services. Schwab’s institutional platform services that assist Beyond Wealth in managing and administering clients’ accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients’ accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab also offers services intended to help Beyond Wealth manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, contact management systems, third party research, publications, access to educational conferences, roundtables, and

Beyond Wealth

February 1, 2024

webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom Beyond Wealth may contact directly.

Schwab is providing Beyond Wealth with certain brokerage and research products and services that qualify as “brokerage or research services” under Section 28(e) of the Securities Exchange Act of 1934 (“Exchange Act”).

Aggregation of Transactions: Beyond Wealth may, from time to time, aggregate client orders into blocks in order to facilitate more efficient account management and execution. When aggregating orders, an average price is given to all participants in the block, or other measures are taken, in order to treat all accounts fairly.

Beyond Wealth is independently operated and owned and is not affiliated with Schwab or any other custodian. We may switch custodians if Schwab is not the best custodian for our clients.

Item 13 – Review of Accounts

At a minimum, all accounts are thoroughly reviewed quarterly. On a weekly basis their cash positions and guidelines are reviewed to make sure that they do not have a negative cash position and they are in compliance with their guidelines. Reviews will happen more frequently if there is a material event that would affect the portfolio or a specific holding in the portfolio. Andrew Comstock, Principal, reviews portfolios and sets strategies.

Our clients receive their portfolio reports on a quarterly basis. These reports are available on request if a client wants to receive them more frequently (such as monthly). Client reports consist of a quarterly performance page, a position report and an asset allocation report. Investment commentary and outlook are often included in quarterly reports.

We meet with our clients at least once a year to review their accounts or financial plans. These meetings can be in person, over the phone, or over video chat.

Item 14 – Client Referrals and Other Compensation

Beyond Wealth provides investment management services on a fee-based basis. We do not accept compensation, including referral fees, from any third parties.

Item 15 – Custody

Beyond Wealth does not accept custody of clients’ assets. Beyond Wealth recommends broker dealers or other custodians based on the quality of service offered and rates charged. Clients should receive at least quarterly statements from the broker dealer, bank, or other qualified custodian that holds and maintains the client’s investment assets. Beyond Wealth urges clients to carefully review such statements and compare such official custodial records to the account statements that we may provide.

Beyond Wealth

February 1, 2024

Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Beyond Wealth receives discretionary authority and maintains limited power of attorney for investments at the beginning of an advisory relationship. The limited power of attorney authorizes Beyond Wealth to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Beyond Wealth observes the investment strategies, limitations, and restrictions of the clients for which it advises. For registered investment companies, Beyond Wealth’s authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, Beyond Wealth does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Beyond Wealth may provide advice to clients regarding the clients’ voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Beyond Wealth’s financial condition. Beyond Wealth has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding. Beyond Wealth does not solicit payments of \$500.00 in fees per client, six months or more in advance.

Item 19 – Requirements for State-Registered Advisers

Beyond Wealth has professional liability insurance coverage for its investment advisory services.

Principal Executive Offices and Management Persons:

A. Backgrounds of Executive Officers and Supervisory Individuals

Andrew Hayes Comstock, CFA

Principal CRD Number: 5523171

Birthday: December 27, 1977

Professional Experience:

Castlebar Asset Management, LLC d/b/a Beyond Wealth (2012 to Present)

Overland Park, KS

Beyond Wealth

February 1, 2024

Principal

Everest Asset Management (2006 to 2012)

Prairie Village, KS

Portfolio Manager

Alpine Atlantic Asset Management AG (2004 to 2006)

Zurich, Switzerland

Portfolio Manager

Bank von Ernst (2002 to 2004)

Vaduz, Liechtenstein

Vice President, Portfolio Manager

Von Ernst Performa (2000 to 2002)

Vaduz, Liechtenstein

Convertible Bond Analyst

Education: University of Tulsa, Bachelor of Science, Finance (1996 to 2000)

Certification: Chartered Financial Analyst, 2007

Chartered Financial Analyst (CFA): The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. It is designed to prepare charter holders for a wide range of investment specialties that apply in every market all over the world. To earn a CFA charter, applicants study for three exams (Levels I, II, III) using an assigned curriculum. Upon passing all three exams and meeting the professional and ethical requirements, they are awarded a charter.

Brandy Branstetter, CFP™

Principal CRD Number: 4969422

Birthday: October 18, 1982

Professional Experience:

Castlebar Asset Management, LLC d/b/a Beyond Wealth (2017 to Present)

Overland Park, KS

Principal

Midwest Financial Group (2015 to 2017)

Overland Park, KS

Investment Advisor Representative

VSR Advisory Services / VSR Financial Services, Inc. (2012-2015)

Overland Park, KS

Investment Advisor Representative

Education: University of Tulsa, Bachelor of Science, Finance (2001 to 2005)

Certification: CERTIFIED FINANCIAL PLANNER, 2017

CFP (Certified Financial Planner)®: The 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 three 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.

Beyond Wealth

February 1, 2024

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 two years, including two 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.

- B. Beyond Wealth is not engaged in any other business other than giving investment advice.
- C. Beyond Wealth does not charge performance fees or compensate staff based on performance fees.
- D. Beyond Wealth is not currently nor has been involved in any arbitrations or civil proceedings.
- E. Beyond Wealth does not have any relationship or arrangement with issuers of securities.