Item 1: Cover Sheet

INFORMATIONAL BROCHURE

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This brochure provides information about the qualifications and business practices of Piedmont Wealth Management. If you have any questions about the contents of this brochure, please contact the firm's Compliance Officer at 540-317-5372 or via email at qmullins@piedmontwm.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. Our registration does not imply a certain level of skill or training.Additional information about Piedmont Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Statement of Material Changes

There have been no material changes since the March 14, 2018 Form ADV filed on the IARD system.

Item 3: Table of Contents

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Item 4: Advisory Business

Mullins Investment Services, LLC d/b/a Piedmont Wealth Management is a fee only financial planning and investment management firm established January 1, 2011. J. Quintin Mullins, owns 95% of the firm, has been in the business of providing advice to clients for over 25 years. Virginia A. Koontz owns 5% of the firm and has been in the business of providing advice to clients for 6 years

Piedmont Wealth Management provides personalized financial planning and/or investment management services. Clients advised may include individuals, trusts, foundations, pensions and corporations.

Financial Planning

Generally, all clients receive financial planning services. In all cases, you supply to Piedmont Wealth Management information including income, investments, savings, insurance, age and many other items that are helpful to the firm in assessing your financial goals. The information is typically provided during personal interviews and supplemented with written information. We will discuss your financial needs and goals with you, analyze the information received and compare your current financial situation with the goals you state. We will create a financial plan to help you meet your goals based on the information you provide and our discussions.

The plan is intended to be a suggested blueprint of how to meet your goals. Each plan is specific to the client who requested it and is based on their goals. Because the plan is based on information supplied by you, it is very important that you accurately and completely communicate to us the information we need including any changes in your life as your engagement with us progresses. It is very important that you continually update us with any changes so that if the updates require changes to your plan, we can make those changes. Otherwise, your plan may no longer be accurate.

Once you have your financial plan, the decision is yours on how to implement it. If you decide to implement your financial plan through Piedmont Wealth Management, you will become an asset management client.

If you request, Piedmont Wealth Management may recommend the services of other professionals for implementation purposes. You are under no obligation to engage the services of any such recommended professional. You retain absolute discretion over all such implementation decisions and are free to accept or reject any recommendation from Piedmont Wealth Management. If you engage any professional recommended by Piedmont Wealth Management, and a dispute arises thereafter relative to such engagement, you agree to seek recourse exclusively from and against the engaged professional. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing in an advisory agreement shall in any way constitute a waiver or limitation of any rights that the client may have under federal and state securities laws.

Part of the Piedmont Wealth Management planning process includes, where appropriate, multiple generations in order to facilitate family financial planning. This can increase the financial education of the later generations and manage expectations. However, potential for conflicts of interest exist with the exchange of intergenerational information. Piedmont Wealth Management attempts to minimize these conflicts by treating each household as its own fiduciary relationship. Information can only be shared across generations with each household's consent.

Asset Management

Piedmont Wealth Management requires each client seeking investment management services to place at least $100,000 with us. We may waive this account minimum under certain circumstances, in our discretion.

If you engage us to manage your investment accounts, we will ask you to provide us with investment guidelines, so that we can create asset allocations that meet your needs. These guidelines can be developed with our help or you can create them yourself. Some examples of guidelines include your risk tolerance, or a maximum amount of assets to be held in non-U.S. investments, or a limit on the amount of stocks in your portfolio. The guidelines will be used to create an Investment Policy Statement for you to serve as the guide for managing your investment accounts.

Asset management services may be provided on either a "discretionary" or "non-discretionary" basis. When Piedmont Wealth Management is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You will receive written or electronic confirmations from your account custodian after any changes are made to your account. You will receive monthly statements from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and Piedmont Wealth Management.

When a client engages us to provide investment management services on a non-discretionary basis, we monitor the accounts in the same way as for discretionary services. The difference is that changes to your account will not be made until we have confirmed with you (either verbally or in writing) that our proposed change is acceptable to you.

Other Services

From time to time, Piedmont Wealth Management may be engaged to perform consulting services outside the scope of traditional asset management and financial planning services. Consulting topics by their nature may vary greatly, but may include discussions regarding a client's business, real estate or other personal assets. Clients who engage Piedmont Wealth Management to provide such consulting services will generally be required to execute a Consulting Agreement.

Assets Under Management

As of December 31, 2018, Piedmont Wealth Management had total assets under management of $53,243,953 across 373 accounts. Of that total, $51,822,195 were managed on a discretionary basis across 363 accounts with $1,421,758 managed on a non-discretionary basis across 10 accounts.

Item 5: Fees and Compensation

A. Fees Charged

All clients will be required to execute an agreement that describes the type of services to be provided and the fees, among other items. We provide services to clients based on the following service and compensation arrangements.

Financial planning services are provided either as a one-time or as an ongoing engagement. If the engagement is one-time, fees for the service are charged on an hourly basis at a rate of $100.00 with a minimum fee of $600. On-going planning engagements will be charged an annual retainer negotiated at the time of the beginning of the engagement with the minimum being $600 per year. Advanced fees are not required. The annual retainer is billed either monthly, quarterly or annual based on the client's request. Fees are negotiable and will depend on the anticipated complexity of your plan. Fees for a single plan engagement will be paid when the plan is complete. If a client elects to terminate the Financial Planning Agreement, any earned fee will be billed to the client.

Investment Management clients are generally charged fees at a rate of 1% per annum of the net market value of a client's assets managed or reviewed by Piedmont Wealth Management. We may provide these services to clients based on a fixed retainer that is negotiated at the time of the account opening. The fee range stated is a guide. Fees are negotiable, and may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, planning services provided and other factors.

Consulting Services

Consulting fees can be hourly, fixed fee basis, or included with asset management services. Our hourly charge is $100 per hour. Fixed fees will be between $1,000 and $5,000. The fee range stated is a guide. Because of the nature of consulting as a general practice with great variety of assignments and issues, the fees for this service may also vary greatly. Accordingly, fees may be higher or lower than the stated range, based on the nature of the engagement. Fees are negotiable and will depend on the anticipated complexity of the services to be provided.

All clients, but especially those with smaller accounts, should be advised they may receive similar services from other professionals for higher or lower overall costs.

B. Fee Payment

Fees for financial planning or consulting will be billed to each client. Fees for asset management may be deducted directly from each client's account or billed directly to the client. The management fee is paid monthly in arrears and the value used for the fee calculation is the net market value on the last market day of the previous month. This means that if your annual fee is 1.00% and your account is billed on a monthly basis, then each month we will multiply the value of your account by 1.00%, then divide by 365, then multiple by the actual number of days in the month to calculate our fee. The value used to calculate Piedmont Wealth Management's fee will include any allocation to cash or cash-like instruments, such as money market funds or bank accounts, of the client's investable assets. Investable cash means cash that is in a client account as an asset allocation. Cash that is not in investable cash is cash that has been identified by the client as designated for a specific purpose.

Once the calculation is made, we will instruct your account custodian to deduct the fee from your account and remit it to Piedmont Wealth Management. You will receive a notice of the fee calculation and collection based on your payment frequency.

C. Other Fees

There are a number of other fees that can be associated with holding and investing in securities. You will be responsible for fees including transaction fees for the purchase or sale of a mutual fund, corporate and municipal bonds, Exchange Traded Funds, or commissions for the purchase or sale of a stock. Expenses of a fund will not be included in management fees, as they are deducted from the value of the shares by the mutual fund manager. For complete discussion of expenses related to each mutual fund, you should read a copy of the prospectus issued by that fund. Piedmont Wealth Management can provide or direct you to a copy of the prospectus for any fund that we recommend to you.

Please make sure to read Item 12 of this informational brochure, where we discuss broker-dealer and custodial issues.

D. *Pro-rata* Fees

Financial Planning: Clients are free to terminate financial planning services. If a client terminates the Financial Planning Agreement, any unearned fees will be returned to the client. Any fees earned to the date of termination will be billed directly to you.

Asset Management: If you become a client during a month, you will pay a management fee for the number of days left in that month. You may terminate the asset management agreement by providing written notice to Piedmont Wealth Management. If you terminate our relationship during a month, you will be charged a management fee for the days from the beginning of the month until your termination date. For example, if you terminate your agreement and there are 15 days have elapsed in that month, you will receive a written bill for those number of days.

Piedmont Wealth Management will cease to perform services, including processing trades and distributions, upon receipt of notice of termination. Assets not transferred from terminated accounts within 30 (thirty) days of termination may be "de-linked", meaning they will no longer be visible to Piedmont Wealth Management and will become a retail account with the custodian. You as the client will retain responsibility for closing the account with the Custodian directly once your account is delinked.

E. Compensation for the Sale of Securities.

Not applicable.

Item 6: Performance Based Fees

Fees will not be based upon a share of capital gains or capital appreciation of your accounts (otherwise known as "performance-based fees").

Item 7: Types of Clients

Clients advised may include individuals, trusts, foundations, pensions and corporations. Piedmont Wealth Management requires each client seeking investment management services to place at least $100,000 with us. We may waive this account minimum under certain circumstances, in our discretion.

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

It is important for you to know and remember that all investments carry risks. Investing in securities involves risk of loss that clients should be prepared to bear.

Each client's portfolio will be invested according to that client's investment objectives. We determine these objectives by interviewing the client and/or asking the client to put these objectives in writing. Once we ascertain your objectives for each account, we will determine which asset allocation strategy is appropriate for you. An asset allocation strategy is a percentage-based allocation to different asset classes. The percentages in each asset class are based on the typical behavior of that asset class, current market conditions, your current financial situation, your financial goals, and the timeline to get you to those goals. Because we develop an investment strategy based on your personal situation and financial goals, your asset allocation guidelines may be similar to or different from another client's.

The specific securities we recommend for your account will depend on market conditions and our research at the time. Generally, we recommend a mix of mutual funds, stocks, bonds, and exchange traded funds. We research securities on a fundamental basis, which means that we review what we believe the value of the security is, and what we think it will be in the future. We base our conclusions on predominantly publicly available research, such as corporate filings, press releases, competitor analyses, and in some cases research we receive from our custodian or other market analyses. We will occasionally utilize technical analyses, which means that we will review the past behaviors of the security and the markets in which it trades for signals as to what might happen in the future.

Once we have designed your asset allocation guidelines, we will buy or sell securities in your portfolio to meet the guidelines of the asset allocation strategy. It is important to remember that because market conditions can vary greatly, your asset allocation guidelines are not necessarily strict rules. Rather, we review accounts individually, and may deviate from the guidelines as we believe necessary. Our proprietary asset allocation strategies are as follows:

Maximum Growth - This investment strategy seeks to provide above average returns by fully investing in equity securities. This strategy employs investments in domestic and international equities to included large cap., mid-cap and small cap market capitalizations. This objective is designed for clients with little or no need for current cash income from the portfolio and an adequate time horizon and the resources to overcome the potential short-term volatility of an all equity investment strategy.

Growth with Income - This investment strategy seeks to provide a blend of portfolio appreciation and modest current cash income by investing in equity and fixed income securities. This strategy employs investments in domestic and international equities to included large cap., mid-cap and small cap market capitalizations. The fixed income component employs a "best after tax" approach by utilizing a concentrated position in investment grade fixed income instruments. This objective is designed for clients with a modest need for current cash income from the portfolio and an adequate time horizon and the resources to overcome the potential short-term volatility of this type of investment strategy.

Balanced - This investment strategy seeks to provide a balance between portfolio appreciation and current cash income by investing in equity and fixed income securities. This strategy employs investments in domestic and international equities to included large cap., mid-cap and small cap market capitalizations. The fixed income component employs a "best after tax" approach by utilizing a concentrated position in investment grade fixed income instruments. This objective is designed for clients with a high need for current cash income from the portfolio and an adequate time horizon and the resources to overcome the potential short-term volatility of this type of investment strategy.

Income with Growth- This investment strategy seeks to provide modest portfolio appreciation with current cash income by investing in stocks and bonds. This strategy employs investments in domestic and international stocks to include large cap., mid-cap and small cap market capitalizations. The bond component employs a "best after tax" approach by utilizing a concentrated position in investment grade bonds. This objective is designed for clients with a higher need for current cash income from the portfolio and an adequate time horizon and the resources to overcome the potential short-term volatility of this type of investment strategy.

Capital Preservation - This investment strategy seeks to provide principal protection by investing the majority of the portfolio in fixed income securities. As a general rule this objective will not include any investment in equity securities unless the client specifically requests an allocation to equities. The fixed income component employs a "best after tax" approach by utilizing a concentrated position in investment grade fixed income instruments. This objective is designed for clients with a high need for current cash income from the portfolio, little or no portfolio appreciation.

The above strategies are each managed as one account for the purpose of operational efficiency. Clients in the same strategy may have different investment restrictions or transition plans and therefore performance may vary.

As assets are transitioned from a client's prior advisors to Piedmont Wealth Management, there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by Piedmont Wealth

Management. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include significant unrealized capital gains, unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. In the event an investment in a client account is unable to be unwound for a period of time, Piedmont Wealth Management will monitor the investment as part of its services to the client. Piedmont Wealth Management may suggest that a given investment be moved to a separate account.

There are always risks to investing. Clients should be aware that all investments carry various types of risk including the potential loss of principal that clients should be prepared to bear. It is impossible to name all possible types of risks. Among the risks are the following:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down on various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Strategy Risk.** When investments are made through a strategy, rather than individualized investment considerations, there is always the possibility that individualized investment choices would have produced a more positive result for a client than an approach where investments are made for a group of individuals with common characteristics.
- **Currency Risk.** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Tax Risks Related to Short Term Trading**: Clients should note that Piedmont Wealth Management may engage in short-term trading transactions. These transactions may result in short term gains or losses for federal and state tax purposes, which may be taxed at a higher rate than long term strategies. Piedmont Wealth Management endeavors to invest client assets in a tax efficient manner, but all clients are advised to consult with their tax professionals regarding the transactions in client accounts.
- **Purchasing Power Risk.** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream. On the other hand, fast food chains tend to have steadier income streams and therefore, less business risk.

- **Financial Risk**. The amount of debt or leverage determines the financial risk of a company.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Information Risk.** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal (proprietary) and external (provided by third parties) data and analyses. Even an adviser who says they rely solely on proprietary research must still collect data from third parties. This data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the adviser to reach satisfactory investment conclusions.
- **Small Companies.** Some investment opportunities in the marketplace involve smaller issuers. These companies may be starting up, or are historically small. While these companies sometimes have potential for outsized returns, they also have the potential for losses because the reasons the company is small are also risks to the company's future. For example, a company's management may lack experience, or the company's capital for growth may be restricted. These small companies also tend to trade less frequently that larger companies, which can add to the risks associated with their securities because the ability to sell them at an appropriate price may be limited as compared to the markets as a whole. Not only do these companies have investment risk, if a client is invested in such small companies and requests immediate or short-term liquidity, these securities may require a significant discount to value in order to be sold in a shorter time frame.
- **Concentration Risk.** While Piedmont Wealth Management selects individual equities and bonds for client portfolios based on an individualized assessment of each security, this evaluation comes without an overlay of general economic or sector specific issue analysis. This means that a client's equity portfolio may be concentrated in a specific sector, geography, or sub-sector (among other types of potential concentrations), so that if an unexpected event occurs that affects that specific sector or geography, for example, the client's equity portfolio may be affected negatively, including significant losses.
- **Transition Risk**. As assets are transitioned from a client's prior advisers to Piedmont Wealth Management there may be securities and other investments that do not fit within the asset allocation strategy selected for the client. Accordingly, these investments will need to be sold in order to reposition the portfolio into the asset allocation strategy selected by Piedmont Wealth Management. However, this transition process may take some time to accomplish. Some investments may not be unwound for a lengthy period of time for a variety of reasons that may include unwarranted low share prices, restrictions on trading, contractual restrictions on liquidity, or market-related liquidity concerns. In some cases, there may be securities or investments that are never able to be sold. The inability to transition a client's holdings into recommendations of Piedmont Wealth Management may adversely affect the client's account values, as Piedmont Wealth Management's recommendations may not be able to be fully implemented.
- **Restriction Risk.** Clients may at all times place reasonable restrictions on the management of their accounts. However, placing these restrictions may make managing the accounts more difficult, thus lowering the potential for returns.
- **Risks Related to Investment Term & Liquidity.** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the

investment had the opportunity to regain its value. Further, some investments are made with the intention of the investment appreciating over an extended period of time. Liquidating these investments prior to their intended time horizon may result in losses.

- **International Investing:** Investing outside of the United States, especially in emerging markets, can have special or enhanced risks. The most obvious are political risk (changes in local politics can have a vast impact on the markets in that country as well as regulations affecting given issuers) and currency risk (changes in exchange rates between the dollar and the local denominations can materially affect the value of the security even if the underlying fundamentals and market price are stagnant). There are other risks, including enhanced liquidity risk, meaning that while domestic equities and mutual funds are generally easily liquidated (though there may be a risk of loss due to the timing of the sale), equities in other jurisdictions may be subject to the circumstances of lower overall market volume and fewer companies on an emerging exchange. In addition, there may be less information and less transparency in a foreign market or from a foreign company. Foreign markets impose different rules than domestic markets, which may not be to an investor's advantage. Also, companies in foreign jurisdictions are generally able to avail themselves of local laws and venues, meaning that legal remedies for U.S. investors may not be as easily obtained as in the U.S.

A special note related to the calculation of tax basis: If a client is unable to provide information on cost basis for tax purposes for each investment at the onset of the client relationship, Piedmont Wealth Management will be unable to provide accurate cost basis information in the future. To the extent any cost basis calculation is ever performed for a client, such client should be aware that without accurate information, any cost basis estimates prepared by Piedmont Wealth Management will be based on the information available combined with certain assumptions as well as mathematical computation. Therefore, if the cost basis is not accurate at the onset of the relationship, there is no guarantee that Piedmont Wealth Management’s calculations will be correct, and materially adverse tax circumstances may result.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

A junior member of Piedmont Wealth Management had mistakenly executed client agreements, which were primarily members of said individual’s family. This member had not yet become properly registered as an investment adviser representative (IAR) with the Commonwealth of Virginia. The matter has been resolved and rectified as of March 14, 2014. The Firm entered into an agreement with the State Corporation Commission to pay a monetary penalty of $5,000 to the Commonwealth of Virginia, and no further action was taken.

C. Self-Regulatory Organization (SRO) Proceedings

There are no self-regulatory organization (SRO) proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-dealer

Neither Piedmont Wealth Management nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

B. Futures Commission Merchant/Commodity Trading Advisor

Neither the principal of Piedmont Wealth Management, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. Relationship with Related Persons

One of Piedmont Wealth Management's representatives, John Coleman, is the sole owner of Commonwealth Business Services ("CBSI"). CBSI provides accounting and/or tax preparation services to clients, including clients of Piedmont Wealth Management. All such services shall be performed by CBSI, in its individual professional capacity, independent of Piedmont Wealth Management, for which services Piedmont Wealth Management shall not receive any portion of the fees charged by CBSI, referral or otherwise. It is expected that the members of CBSI, solely incidental to their respective practices as Certified Public Accountants with CBSI, shall recommend Piedmont Wealth Management's services to certain clients of CBSI's. No client of Piedmont Wealth Management is under any obligation to use the services of CBSI. Piedmont Wealth Management's Principal, J. Quintin Mullins, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create. Piedmont Wealth Management also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of Piedmont Wealth Management, which requires that employees put the interests of clients ahead of their own.

D. Recommendations of Other Advisers

Piedmont Wealth Management does not recommend other financial advisers.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. A copy of our Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts, entertainment, and trading guidelines.

B. Not applicable.

C. On occasion, an employee of Piedmont Wealth Management may purchase for his or her own account securities which are also recommended for clients. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trades, so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

D. On occasion, an employee of Piedmont Wealth Management may purchase for his or her own account securities which are also recommended for clients at the same time the clients purchase the securities. Our Code of Ethics details rules for employees regarding personal trading and avoiding conflicts of interest related to trading in one's own account. To avoid placing a trade before a client (in the case of a purchase) or after a client (in the case of a sale), all employee trades must be reviewed by the Compliance Officer. All employee trades must either take place in the same block as a client trade or sufficiently apart in time from the client trade so the employee receives no added benefit. Employee statements are reviewed to confirm compliance with the trading procedures.

Item 12: Brokerage Practices

A. Recommendation of Broker-Dealer

Piedmont Wealth Management does not maintain custody of client assets; though Piedmont Wealth Management may be deemed to have custody if a client grants Piedmont Wealth Management authority to debit fees directly from their account (see Item 15 below). Assets will be held with a qualified custodian, which is typically a bank or broker-dealer. Piedmont Wealth Management recommends that investment accounts be held in custody by Schwab Advisor Services ("Schwab"), which is a qualified custodian. Piedmont Wealth Management is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when Piedmont Wealth Management instructs them to, which Piedmont Wealth Management does in accordance with its agreement with you. While Piedmont Wealth Management recommends that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Piedmont Wealth Management does not open the account for you, although Piedmont Wealth Management may assist you in doing so. Even though your account is maintained at Schwab, we may use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs").

How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including both quantitative (Ex: costs) and qualitative (execution, reputation, service) factors. We do not consider whether Schwab or any other broker-dealer/custodian, refers clients to Piedmont Wealth Management as part of our evaluation of these broker-dealers.

Your brokerage and custody costs

For our clients' accounts that Schwab 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. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

Products and services available to us from Schwab

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like Piedmont Wealth Management. They provide Piedmont Wealth Management and our clients with access to its institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help Piedmont Wealth Management manage or administer our clients’ accounts, while others help Piedmont Wealth Management manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to Piedmont Wealth Management. Following 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 also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a 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 client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients’ accounts
- Assist 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:
• Educational conferences and events
• Consulting on technology, compliance, legal, and business needs
• Publications and conferences on practice management and business succession
•Access to employee benefits providers, human capital consultants, and insurance providers
• Assistance related to the transition of client assets from prior firms

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.

Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. We may have an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential 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 (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

We do not consider whether Schwab or any other broker-dealer/custodian, refers clients to Piedmont Wealth Management as part of our evaluation of these broker-dealers.

B. Aggregating Trades

Commission costs per client may be lower on a particular trade if all clients in whose accounts the trade is to be made are executed at the same time. This is called aggregating trades. Instead of placing a number of trades for the same security for each account, we will, when appropriate, executed one trade for all accounts and then allocate the trades to each account after execution. If an aggregate trade is not fully executed, the securities will be allocated to client accounts on a *pro rata* basis, except where doing so would create an unintended adverse consequence (For example, ¼ of a share, or a position in the account or less than 1%.)

Item 13: Review of Accounts

All accounts will be reviewed by J. Quintin Mullins, the firm's principal on at least an annual basis. However, it is expected that market conditions, changes in a particular client's account, or changes to a client's circumstances will cause a review of your account by either member of the firm..

All clients will receive a quarterly written report from Piedmont Wealth Management showing asset allocation and performance, as well as statements from Schwab, and copies of all trade confirmations directly from Schwab. We encourage you to compare the information on your quarterly report prepared by Piedmont Wealth Management against the information in the statements provided directly from Schwab and alert us of any discrepancies.

Item 14: Client Referrals and Other Compensation

Currently not applicable.

Item 15: Custody

Piedmont Wealth Management deducts fees from client accounts, but would not have custody of client funds otherwise. Clients will receive statements directly from Schwab, and copies of all trade confirmations directly from Schwab.

Clients whose fees are directly debited will provide written authorization to debit advisory fees from their accounts held by a qualified custodian chosen by the client. As fees are deducted, clients will receive a bill itemizing the fees to be debited, including the formula used to calculate the fee, the amount of assets the fee is based, and the time period covered by the fee. The invoice will also state that the fee was not independently calculated by the custodian. The client will also receive a statement from their account custodian showing all transactions in their account, including the fee.

We encourage clients to carefully review the statements and confirmations sent to them by their custodian, and to compare the information on your quarterly report prepared by Piedmont Wealth Management against the information in the statements provided directly from Schwab. Please alert us of any discrepancies.

Our clients may have standing letters of authorization on their accounts. We have reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

Item 16: Investment Discretion

When Piedmont Wealth Management is engaged to provide asset management services on a discretionary basis, we will monitor your accounts to ensure that they are meeting your asset allocation requirements. If any changes are needed to your investments, we will make the changes. These changes may involve selling a security or group of investments and buying others or keeping the proceeds in cash. You may at any time place restrictions on the types of investments we may use on your behalf, or on the allocations to each security type. You may receive at your request written or electronic confirmations from your account custodian after any changes are made to your account. You will also receive monthly statements from your account custodian. Clients engaging us on a discretionary basis will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and Piedmont Wealth Management.

Item 17: Voting Client Securities

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. Piedmont Wealth Management will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. Piedmont Wealth Management will not give clients advice on how to vote proxies.

Item 18: Financial Information

Piedmont Wealth Management does not require the prepayment of fees more than six (6) months or more in advance and therefore has not provided a balance sheet with this brochure.

Piedmont Wealth Management has discretion over some client accounts. There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.

Item 19: Requirements for State-Registered Advisers

A. <u>Principal Officers</u>: The principal officer is J. Quintin Mullins, Managing Member of Piedmont Wealth Management. Mr. Mullins received a B.S. in Business Administration (*cum laude)* from Bluefield State College and an M.B.A. from the Marshall University, College of Graduate Studies. Prior to starting Piedmont Wealth Management, Mr. Mullins was a Senior Vice President and Portfolio Manager with StellarOne Bank. Mr. Mullins is also a Certified Financial Planner.

B. <u>Other Business</u>:

Not applicable.

C. <u>Performance Based Fees</u>: Piedmont Wealth Management will not collect performance-based fees.

D. <u>Disclosure Events</u>: No management person of Piedmont Wealth Management has been involved in any disclosure events.

E. <u>Management Relationships with Issuers:</u>

Not applicable.

Item 1: Cover Sheet

ADV Part 2B: J. Quintin Mullins

131 W. Davis Street
Culpeper, VA 22701
www.piedmontwm.com
(540) 317-5372

February 7, 2019

This Brochure Supplement provides information about J. Quintin Mullins that supplements the Piedmont Wealth Management Brochure. You should have received a copy of that Brochure. Please contact J. Quintin Mullins at the number above if you did not receive Piedmont Wealth Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about J. Quintin Mullins is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: **Educational Background and Business Experience**

J. Quintin Mullins
Born: 1958

EDUCATION:

Bluefield State College
Bachelor of Science – Business Administration
Accounting/Management
Graduated May 1980 Cum Laude

Marshall University- College of Graduate Studies
Masters of Business Administration
Graduated May 1993

Southeastern Trust School at Campbell University – June, 1989

Cannon Financial Institute, Trust Graduate School – October, 1998

Virginia Bankers Association School of Bank Management
University of Virginia, 1996-1998
Graduated with honors

PROFESSIONAL CERTIFICATIONS:

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.

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, administered in 10 hours over a two-day period, 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 *Code of Ethics and Standards of 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 two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Code of Ethics and *Standards of Conduct*. The Standards of Conduct require that CFP® professionals act as a fiduciary when providing financial advice to a client. This means CFP® professionals must act in the best interest of the client when providing financial advice.

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 EXPERIENCE:

Piedmont Wealth Management
Managing Director
January 2011 to Present

StellarOne Bank
Senior Vice President and Portfolio Manager
1990 through January 2011

Item 3: 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 each supervised person providing investment advice. No information is applicable to this Item for Mr. Mullins.

Item 4: Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any investment related outside business activity. No information is applicable to this Item for Mr. Mullins.

Item 5: Additional Compensation

Registered investment advisers are required to disclose all material facts regarding any additional compensation the individual receives related to his advisory activities. Examples of this include sales awards or referral fees. No information is applicable to this Item for Mr. Mullins.

Item 6: Supervision

Mr. Mullins is the firm's only principal, and thus has no direct supervisor. However, Mr. Mullins' activities follow the firm's Compliance Manual, which includes policies and procedures designed to provide supervision to all investment adviser representatives in guiding them through compliance with applicable laws, rules and regulations, including the fiduciary duty owed to clients.

Item 7: Requirements for State Advisers

A. Mr. Mullins has **not** been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:
a) an investment or an investment-related business or activity;
b) fraud, false statement(s), or omissions;
c) theft, embezzlement, or other wrongful taking of property;
d) bribery, forgery, counterfeiting, or extortion; or
e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
a) an investment or an investment-related business or activity;
b) fraud, false statement(s), or omissions;
c) theft, embezzlement, or other wrongful taking of property;
d) bribery, forgery, counterfeiting, or extortion; or
e) dishonest, unfair, or unethical practices.

B. Mr. Mullins has **not** been the subject of a bankruptcy petition at any time.

Item 1: Cover Sheet

ADV Part 2B: Virginia A. Koontz

131 W. Davis Street
Culpeper, VA 22701
www.piedmontwm.com
(540) 317-5372

February 7, 2019

This Brochure Supplement provides information about Virginia Koontz that supplements the Piedmont Wealth Management Brochure. You should have received a copy of that Brochure. Please contact J. Quintin Mullins at 540-317-5372 or qmullins@piedmontwm.com **if you did not receive Piedmont Wealth Management's Brochure or if you have any questions about the contents of this supplement.**

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

Item 2: Educational Background and Business Experience

Virginia Koontz
Born: 1986

EDUCATION:

Virginia Polytechnic Institute and State University
B. S. - Agricultural and Applied Economics with Financial Planning Option, 2010

PROFESSIONAL CERTIFICATIONS:

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.

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, administered in 10 hours over a two-day period, 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 *Code of Ethics and Standards of 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 two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Code of Ethics and *Standards of Conduct*. The Standards of Conduct require that CFP® professionals act as a fiduciary when providing financial advice to a client. This means CFP® professionals must act in the best interest of the client when providing financial advice.

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 EXPERIENCE:

Piedmont Wealth Management,
Financial Planner, January 2013 to Present

The Henderson Group, Associate Planner,
January 2011 to December 2012

Item 3: 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 each supervised person providing investment advice. No information is applicable to this Item for Ms. Koontz.

Item 4: Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any investment related outside business activity. No information is applicable to this Item for Ms. Koontz.

Item 5: Additional Compensation

Registered investment advisers are required to disclose all material facts regarding any additional compensation the individual receives related to their advisory activities. Examples of this include sales awards or referral fees. Ms. Koontz receives 20% of any fees as a result of any new clients obtained through her efforts during 2019. This bonus is calculated and paid at the end of each quarter.

Item 6: Supervision

Ms. Koontz reports to the firm's principal, J. Quintin Mullins. J. Quintin Mullins can be reached at (540) 317-5372. All employees of Piedmont Wealth Management are required to follow the supervisory guidelines and Compliance manual which is designed to ensure compliance with applicable laws, rules and regulations, including the fiduciary duty owed to clients.

Item 7: Requirements for State Advisers

A. Ms. Koontz has **not** been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:
a) an investment or an investment-related business or activity;
b) fraud, false statement(s), or omissions;
c) theft, embezzlement, or other wrongful taking of property;
d) bribery, forgery, counterfeiting, or extortion; or
e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
a) an investment or an investment-related business or activity;
b) fraud, false statement(s), or omissions;
c) theft, embezzlement, or other wrongful taking of property;
d) bribery, forgery, counterfeiting, or extortion; or
e) dishonest, unfair, or unethical practices.

B. Ms. Koontz has **not** been the subject of a bankruptcy petition at any time.

Item 1: Cover Sheet

ADV Part 2B: John P. Coleman, CPA

131 W. Davis Street
Culpeper, VA 22701
www.piedmontwm.com
(540) 317-5372

February 7, 2019

This Brochure Supplement provides information about John P. Coleman that supplements the Piedmont Wealth Management Brochure. You should have received a copy of that Brochure. Please contact J. Quintin Mullins at 540-317-5372 or qmullins@piedmontwm.com if you did not receive Piedmont Wealth Management's Brochure or if you have any questions about the contents of this supplement.

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

Item 2: Educational Background and Business Experience

John P. Coleman
Born: 1969

EDUCATION:

Virginia Polytechnic Institute and State University
Masters of Accountancy, Taxation, 1992

Virginia Tech
Bachelor of Science in Business, Accounting, 1991

PROFESSIONAL CERTIFICATIONS:

Certified Public Accountant

In order to become a CPA in the United States, the candidate must sit for and pass the Uniform Certified Public Accountant Examination (Uniform CPA Exam), which is set by the American Institute of Certified Public Accountants and administered by the National Association of State Boards of Accountancy. The CPA was established in law on April 17, 1896.

Eligibility to sit for the Uniform CPA Exam is determined by individual State Boards of Accountancy. Typically, the requirement is a U.S. bachelor's degree which includes a minimum number of qualifying credit hours in accounting and business administration with an additional 1year study. This requirement for 5 years study is known as the "150-hour rule" and has been adopted by the majority of state boards, although there are still some exceptions (e.g. California). This requirement mandating 150 hours of study has been adopted by 45 states.

The primary functions CPA fulfill relate to assurance services, or public accounting. In assurance services, also known as financial audit services, CPAs attest to the reasonableness of disclosures, the freedom from material misstatement, and the adherence to the applicable generally accepted accounting principles (GAAP) in financial statements. CPAs can also be employed by corporations-termed "the private sector"-in finance functions such as Chief Financial Officer (CFO) or finance manager, or as CEOs subject to their full business knowledge and practice. These CPAs do not provide services directly to the public.

CPAs also have a niche within the income tax preparation industry. They may also provide business consultation in the areas of entity set-up, QuickBooks assistance, financial statements, and buying v. leasing of equipment.

Whether providing services directly to the public or employed by corporations or associations, CPAs can operate in virtually any area of finance. While some CPAs are generalists and offer a range of services (especially those in small practices) many CPAs specialize in just one area and do not provide all services.

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

- Ethics -- Over 40 of the state boards now require applicants for CPA status to complete a special examination on ethics, which is effectively a Fourth E in terms of requirements to become a CPA. The majority of these will accept the AICPA self-study Professional Ethics for CPAs CPE course or another course in general professional ethics. Many states, however, require that the ethics course include a review of that state's specific rules for professional practice.
- Continuing Professional Education (CPE)--CPAs are required to take continuing education courses in order to renew their license. Requirements vary by state, but the vast majority requires 120 hours of CPE every 3 years with a minimum of 20 hours per calendar year. The requirement can be fulfilled through attending live seminars, webcast seminars, or through self-study (textbooks, videos, online courses, all of which require a test to receive credit). As part of the CPE requirement, most states require their CPAs to take an ethics course during every renewal period. Again, ethics requirements vary by state, but the courses range from 2-8 hours.

BUSINESS EXPERIENCE:

Piedmont Wealth Management
Investment Advisor Representative, August 2016 to Present

Commonwealth Business Services
Owner, CPA, February 2004 to Present

MML Investor Services, Inc.
Registered Representative, January 2010 to July 2014

MassMutual Life Insurance Company
Agent, December 2009 to July 2014

Primerica Financial Services
Sales Representative, October 2003 to December 2008

Item 3: 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 each supervised person providing investment advice. No information is applicable to this Item for Mr. Coleman.

Item 4: Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any investment related outside business activity.

Mr. Coleman is the sole owner of Commonwealth Business Services, Inc (CBSI), working as a tax accountant to provide various tax services to clients. Specifically, to the extent that CBSI provides accounting and/or tax preparation services to any clients, including clients of Piedmont Wealth Management, all such services shall be performed by CBSI, in its individual professional capacity, independent of Piedmont Wealth Management, for which services Piedmont Wealth Management shall not receive any portion of the fees charged by CBSI, referral or otherwise. It is expected that the members of CBSI, solely incidental to their respective practices as Certified Public Accountants with CBSI shall recommend Piedmont Wealth Management's services to certain clients of CBSI. No client of Piedmont Wealth Management is under any obligation to use the services of CBSI. Piedmont Wealth Management's Principal, J. Quintin Mullins, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create. Piedmont Wealth Management also attempts to mitigate the conflict of interest by requiring employees to acknowledge in the firm's Code of Ethics, their individual fiduciary duty to the clients of Piedmont Wealth Management, which requires that employees put the interests of clients ahead of their own.

Item 5: Additional Compensation

Please see response to Item 4, above.

Item 6: Supervision

Mr. Coleman reports to the firm's principal, J. Quintin Mullins. J. Quintin Mullins can be reached at (540) 317-5372. All employees of Piedmont Wealth Management are required to follow the supervisory guidelines and procedures manual which is designed to ensure compliance with applicable laws, rules and regulations, including the fiduciary duty owed to clients.

Item 7: Requirements for State Advisers

A. Mr. Coleman has **not** been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of $2,500, involving any of the following:

a) an investment or an investment-related business or activity;
b) fraud, false statement(s), or omissions;
c) theft, embezzlement, or other wrongful taking of property;
d) bribery, forgery, counterfeiting, or extortion; or
e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

a) an investment or an investment-related business or activity;
b) fraud, false statement(s), or omissions;
c) theft, embezzlement, or other wrongful taking of property;
d) bribery, forgery, counterfeiting, or extortion; or
e) dishonest, unfair, or unethical practices.

B. Mr. Coleman has **not** been the subject of a bankruptcy petition at any time.