AVION WEALTH

FORM CRS RELATIONSHIP SUMMARY
MAY 2020

INTRODUCTION

Avion Wealth is registered with the Securities and Exchange Commission (SEC).

Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational material about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors. We provide portfolio monitoring and asset allocation services that we offer on a discretionary according to the authority you provide in an investment advisory agreement with us. When you grant us discretionary authority you provide us with authority to determine the investments to buy and sell in your account on an ongoing basis. You may impose reasonable restrictions on our discretionary authority, which must be provided to us in writing and accepted by us. As part of portfolio management services, we will continuously monitor your investments and provide advice. We require a minimum initial and ongoing account size for portfolio management services.

We provide financial planning services, in which we focus primarily on assisting individuals, who are considering retirement or who have retired from the aviation industry, in planning for their financial futures. For the financial planning only service we do not monitor your investments and you make the ultimate decision regarding the purchase and sale of investments.

Additional information about our services can be found in ADV Part 2A, Items 4 and 7.

Ask your financial professional…

- *Given my financial situation, should I choose an investment advisor service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What fees will I pay?

We charge a percentage of assets under management for portfolio management services. These fees are assessed on a quarterly basis, in advance. you should be aware that the more assets there are in your account, the more you may pay in fees. This means we have an incentive to encourage you to increase the assets in your account. We charge a fixed fee for financial planning services. When you pay us on a fixed fee basis it will not include fees for implementing recommendations made. This means we have an incentive to recommend additional advisory services to you for which additional fees are charged.

For those clients where we provide financial planning only, the fee is based on our minimum quarterly fee.

Examples of the most common fees and costs applicable to retail investors include custodian fees, account maintenance fees, fees related to mutual funds, and other transactional fees and product-level fees.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Please refer to firm's ADV Part 2, Item 5 for additional information regarding our fees.

Ask your financial professional: Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations as my investment adviser? How else does your firm make money and what conflicts of interest do you have?
When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means.

Avion Wealth allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) for you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures.

Ask your financial professional: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?
Our financial professionals receive a salary and then have overrides for a percentage of client revenue. This factor creates a conflict of interest because our financial professionals have an incentive to encourage a retail investor to increase the assets in a retail investor's account.

Do you or your financial professionals have legal or disciplinary history?
No. Please visit Investor.gov/CRS for a free and simple search tool to research you and your financial professionals.
Ask your financial professional: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Additional information about Avion Wealth's service and to request a copy of ADV Part 3 (Form CRS), please contact us at (281) 528-1200.

AVION WEALTH

2829 Technology Forest Blvd, Suite 300

The Woodlands, TX 77381

Tel.: (281) 528-1200

Fax: (888) 868-1168

www.AvionWealth.com

August 2026

FORM ADV PART 2

BROCHURE

This brochure provides information about the qualifications and business practices of Avion Wealth. If you have any questions about the contents of this brochure, please contact us at (281) 528-1200. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Avion Wealth is also available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable IARD/CRD number for Avion Wealth is 134242.

Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

As a registered investment adviser, we must ensure that our brochure is current and accurate and makes full disclosure of all material facts relating to the advisory relationship. If there have been any material changes to our business or advisory practices since our last annual update, we will provide a description of such material changes here.

Since our last annual updating amendment dated February 2026, we have made the following material changes to our brochure:

Item 4: Addition of Options Trading/Writing

Item 3 Table of Contents

COVER PAGE i

Item 2 Material Changes ii

Item 3 Table of Contents iii

Item 4 Advisory Business 1

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 and Personal Trading 8

Item 12 Brokerage Practices 9

Item 13 Review of Accounts 13

Item 14 Client Referrals and Other Compensation 13

Item 15 Custody 13

Item 16 Investment Discretion 14

Item 17 Voting Client Securities 14

Item 18 Financial Information 14

Paul James Carroll, CFP® 16

Elizabeth A. Brady, CFP® 19

Ashley Dominey Stewart, CFP® 22

Sarah E. McIvor, CFP® 26

Megan Beaufays, CFP® 30

Christopher J. McBee, CFP® 34

Ashley Owens 38

Alexander Amundson, CFP® 40
Abigail Demirovic 44
Customer Information Privacy Principles 48
BUSINESS CONTINUITY PLAN SUMMARY STATEMENT 51

Item 4 Advisory Business

Avion Wealth, LLC is registered investment adviser based in The Woodlands, Texas. We are organized as a limited liability company under the laws of the State of Texas. We have been providing investment advisory services since 2005. The firm is owned by Paul James Carroll, Managing Member, Chief Executive Officer and Chief Compliance Officer. Our mission is to provide our clients with sensible and unbiased financial planning solutions where the interests of our clients always come first. Our goal is to assist our clients in prioritizing and qualifying their financial goals, setting realistic expectations and implementing a disciplined and prudent investment and savings strategy to achieve these goals.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our" and "us" refer to Avion Wealth and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this brochure. As used in this brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

Investment Consulting

We provide discretionary portfolio management services to our clients. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information (the "suitability information") at the beginning of our advisory relationship. We will use the suitability information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we will customize an investment portfolio for you in accordance with your risk tolerance and investing objectives. Once we construct an investment portfolio for you, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm, a limited power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing.

As part of this service, we will assist you in determining your investment goals and objectives, risk tolerance, and retirement plan time horizon in order to create

an initial portfolio allocation designed to complement your educational, home ownership, and retirement funds goals and objectives. The advisory representative will then prepare an investment policy describing asset-class allocation recommendations without detailing specific holdings.

Our investment strategy will focus primarily on a buy and hold approach as opposed to short-term trading. Each portfolio will be initially designed to meet a particular investment goal, which your advisory representative has determined to be suitable for your circumstances. Once the appropriate portfolio has been determined, your advisory representative will review the portfolio at least monthly and, if necessary, rebalance your portfolio, based upon your individual needs and stated goals and objectives. As our client, you will have the opportunity to place reasonable restrictions on the types of investments to be held in your portfolio. Our strategy, generally, will be to seek long term portfolio growth while providing you with access to the personal advisory services of an advisory representative on at least an annual basis, or more often, depending upon your specific agreement with your advisory representative. Our advisory representatives will not attempt to manage short-term market fluctuations with active trading (market-timing/allocation, etc.).

In our work with clients, we discuss the payout options for defined benefit, 401(k) and other retirement plan types. When doing so, we may recommend that the client choose a lump sum payout. This may be a conflict of interest if the client decides to place those funds with us to be managed.

Our fee for portfolio management services is based on a percentage of your assets we manage and is charged according to the following fee schedule:

Portfolio Value	**Advisory Fee**
$0 to $2,500,000	1%
$2,500,001 to $4,000,000	0.9%
$4,000,001 to $7,000,000	0.8%
$7,000,001 to $10,000,000	0.7%
$10,000,001 to $15,000,000	0.6%
$15,000,001 to $25,000,000	0.55%
$25,000,001 to $50,000,000	0.5%
$50,000,001 & Above	Negotiable

* Our minimum quarterly investment advisory fee for Portfolio Management Services is $5,000. However, the minimum may be less, based on the assets to be managed, the

advisor, and the complexity of the client work. This is dicussed in advance with the client and included in the agreement. Also, the minimum quarterly investment advisory fee is $9,000 for the Complex Entrepreneur client.

* Any fee agreement made and/or amended will be valid for 24 months, regardless of any subsequent amendments at the firm level within those 24 hours.

* Older client relationships may be subject to different fee schedules or minimum quarterly fees.

* If for any reason the client named in the Investment Advisory Agreement no longer wants to continue services with Avion Wealth within the first 60 days after the Investment Advisory Agreement signing date, the client will receive a full refund of any fees paid.

For all accounts the fee schedule is tiered, whereby fees are assessed a flat percentage according to the corresponding portfolio value bracket.

The annual fee for investment management services provided are based upon a percentage (%) of the market value of the Assets under management in accordance with the fee schedule in the Agreement signed by the client. Avion Wealth considers cash to be an asset class and part of Assets under management and subject to the same fee calculation as the client's non-cash investments.

At our discretion, we may assess lower than stated fees for existing accounts. We may also combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

Unless otherwise agreed upon in writing, the advisory fee is allocated among all aggregated accounts and deducted in accordance with such allocation.

We may enter into arrangements with clients where we will manage retirement plan assets on a discretionary basis. If you engage our firm for such services, we must adhere to ERISA bonding requirements pursuant to ERISA Section 412 as well as any other applicable ERISA requirements.

Our annual portfolio management fee is billed and payable quarterly in advance based on the value of your account on the last day of the previous quarter. The initial fee is payable when your account is established. If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Additional deposits to your account during a quarter are subject to the same fee procedures.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your

account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

You may terminate the portfolio management agreement by providing written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the agreement for services, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Advanced Planning Services

We typically provide advanced financial planning services to you as part of our investment advisory services. Services are provided in several areas depending on your goals, objectives and financial situation.

Avion has developed a structured process to help organize and manage the details of your complex affairs, so that you can be confident that nothing falls throught the cracks. The Avion Wealth Formula is Wealth Management = Investment Consulting + Advanced Planning + Relationship Management.

Wealth Management is described in the section on Investment Consulting section above.

Advanced Planning can include strategies and recommendations on minimizing taxes and maximizing cash flow, wealth transfer (taking care of your heirs), protecting your assets from legal and financial threats, and maximizing the impact of your charitable giving.

Relationship Management refers to the Avion team that will work with you to achieve your financial goals and objectives.

Avion may also refer clients to an accountant, attorney or other specialist, as appropriate for their unique situation. When appropriate, we will provide a written summary of your financial situation, observations, and recommendations.

Types of Investments

We primarily offer advice on equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities, U.S. Government securities, options contracts on securities, futures contracts on securities and commodities, and interest in partnerships investing in real estate, oil and gas interests, and others.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

Assets Under Management

As of December 31, 2025, we manage $983,989,638 in client assets on a discretionary basis and $561,310 on a non-discretionary basis.

Item 5 Fees and Compensation

Please refer to the "Advisory Business" section in this Brochure for information on our advisory fees, fee paying arrangements, and refund policy according to each service we offer.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others.

For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Disclosure Brochure.

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

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the Advisory Business section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We currently offer investment advisory services to individuals (including high net worth individuals and trust). We will also service charitable organizations, corporations, and other business entities. In general, we require a minimum of $1,000,000 to open and maintain an advisory account. At our discretion, we may waive this minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Investment Strategies

We may use one or more of the following investment strategies when formulating investment advice:

- Modern Portfolio Theory (MPT) - Asset Allocation (MPT is utilized extensively). MPT is a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets. Market risk applies with MPT. Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

Methods of Analysis

We may use one or more of the following methods of analysis when providing investment advice to you:

- Long Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

- Short Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

- Margin Transactions - a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

Where suitable, we primarily recommend investment in Exchange Traded Funds and Indexed Mutual Funds; however, we may recommend other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Mutual funds and exchange traded funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of the fund, other types of mutual funds do charge such fees which can also reduce returns.

Mutual funds can also be "closed end" or "open end". Open-end funds calculate the value of one share, known as the net asset value (NAV), only once a day, when the investment markets close. All purchase and sales for the day are recorded at that NAV. To figure its NAV, a fund adds up the total value of its investment holdings, subtracts the fund's fees and expenses, and divides that amount by the number of fund shares that investors are currently holding. NAV isn't necessarily a measure of a fund's success, as stock prices are, however. Since open-end funds can issue new shares and buy back old ones all the time, the number of shares and the dollars invested in the fund are constantly changing. That's why in comparing two funds it makes more sense to look at their total return over time rather than to compare their NAVs. Closed-end funds differ from open-end funds because they raise money only once in a single offering, much the way a stock issue raises money for the company only once, at its initial public offering, or IPO. After the shares are sold, the closed-end fund uses the money to buy a portfolio of underlying investments, and any further growth in the size of the fund depends on the return on its investments, not new investment dollars. The fund is then listed on an exchange, the way an individual stock is, and shares trade throughout the day.

Item 9 Disciplinary Information

Avion Wealth has been registered and providing investment advisory services since 2005. Neither our firm nor any of our associated persons has any reportable legal or disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

Neither Avion Wealth,, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Avion Wealth, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

Avion Wealth does not have any relationship or arrangement that is material to its advisory business or to its clients with any related person.

Item 11 Code of Ethics and Personal Trading

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Our Code of Ethics also requires that certain persons associated with our firm submit reports of their personal account holdings and transactions to a qualified representative of our firm who will review these reports on a periodic basis. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent

the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting us at (281) 528-1200 or via email at **paul@avionwealth.com**

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

The custodians and brokers we use

Avion Wealth does not maintain custody of your assets, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained at a "qualified custodian," generally a broker-dealer or bank. We recommend the brokerage and custodial services of Charles Schwab & Co., Inc. ("Schwab") or Fidelity Institutional Wealth Services ("Fidelity"), registered broker-dealer and the Securities Investor Protection Corporation ("SIPC"). Both are qualified custodians. We are independently owned and operated and are not affiliated with either Schwab or Fidelity. The qualified custodian will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use a qualified custodian, you will decide whether to do so and will open your account at Schwab or Fidelity by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Schwab or Fidelity, we can still 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 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:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)

- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Schwab")

Your brokerage and custody costs

For our clients' accounts that Schwab and Fideltiy maintain, they generally do 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 account. Certain trades (for example, many mutual funds and ETFs) may not incur custodial commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. The custodians charge 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 or Fidelilty 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 the custodian execute most trades for your account. We have determined that having the custodian 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 the custodians

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. Both Schwab and Fidelity provide us and you with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to the custodian’s retail customers. The custodians also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. The custodian's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of the custodian's support services:

Services that benefit you

The custodian'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 the custodians include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. The custodian's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you

The custodian 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 the custodian'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 either custodian. In addition to investment research, the custodians 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

The custodians 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
- Marketing consulting and support

The custodians may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. The custodians may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. The

custodian 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. This creates an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business and for which we would otherwise have to pay 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 receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

In limited circumstances, and at our discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our firm to use a particular broker, you should understand that this might prevent from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Block Trades

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (the practice of combining multiple orders for shares of the same securities is commonly referred to as "block trading"). Accordingly, you may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

However, for accounts where we have been instructed by the client to use a particular broker for transactions, trades will be placed in the these accounts after trades have been placed via Fidelity or Schwab. This is done on the same day, and for mutual funds this will not be an issue. However, when ETFs are traded via the directed broker after the trades have been placed with Fidelity or Schwab, you may pay different prices than other clients for the same securities transactions. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

Item 13 Review of Accounts

Paul James Carroll, Chief Executive Officer, or the assigned advisory representative on the account will review your accounts on a monthly basis. We will conduct an extensive client account review and meeting at least annually or more frequently if economic, political, or market conditions dictate or upon your request. We may conduct interim meetings or account reviews at your request or upon our receipt of information material to the management of your portfolio.

You will receive statements directly from your account custodian on either a monthly or quarterly basis. The statements will reflect the position, current pricing, transactions in each account, including fees paid from your account to our firm. You may also receive periodic asset allocation reports showing drift and total balance of the account.

Item 14 Client Referrals and Other Compensation

We receive an economic benefit from our custodians in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab and Fidelity.

We compensate individuals and/or firms for client referrals. We will enter into an agreement with the individual or firm and remit a portion of its advisory fees for referrals. This arrangement is fully explained to the client when this situation arises. Our client advisory fees are not affected by the referral fees paid to the individual or firm. All promoters who refer clients will comply with the requirements of the jurisdiction where they operate. When applicable, the promoter will be licensed as investment advisor(s) or notice filed in the applicable jurisdiction.

Item 15 Custody

We directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent qualified custodian. You will receive account statements from the independent qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. If you are not receiving at least quarterly custodial account statements, please contact us at the number on the cover page of this brochure.

As a result of assisting clients with standing letters of authorization to move funds to other accounts of a client, the firm has been deemed to have custody. This is reported to the SEC but the firm believes it meets the conditions for exemption and is not required to seek a surprise annual audit.

Item 16 Investment Discretion

You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement.

You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Item 18 Financial Information

Our firm does not have any financial conditions or impairments that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and we do not require the prepayment of fees six or more months in advance and in excess of $1,200. Therefore, we are not required to include a financial statement with this brochure.

In an effort to support companies and industries impacted by the current Covid-19 pandemic, on March 27, 2020, Congress passed the CARES Act. A key component of the CARES Act is the Paycheck Protection Program (PPP). The PPP was intended to provide low interest and forgivable loans to businesses and the self-employed to help retain employees and cover certain expenses. The Small Business Administration, SBA, has so far issued 4.2 million loans to small business owners throughout the US since the rollout of the program. Our firm applied for a loan to participate in the Paycheck Protection Program as part of the CARES Act and was granted one on April 20, 2020 in the amount of $180,000. The company intends to use the loan proceeds for purposes consistent with the PPP; certain amounts of the loan may be forgiven if they are used for qualifying expenses as described in the CARES Act.

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact Paul James Carroll, Principal and Chief Compliance Officer at (281) 528-1200 or via email at: **paul@avionwealth.com**, if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, the custodian will donate the proceeds to charity.

Class Action Lawsuits

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

AVION WEALTH

Paul James Carroll, CFP®

2829 Technology Forest Blvd Suite 300
The Woodlands, TX 77381
Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Paul James Carroll that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Paul Carroll is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Paul Carroll is 1896590.

Item 2 Educational Background and Business Experience

Paul James Carroll, CFP®

Year of Birth: 1962

Formal Education After High School:

- Texas A&M University Masters of Science Finance 1987
- University of Maryland Bachelors of Science Business 1985

Business Background:

- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Managing Member/Chief Executive Officer/Chief Compliance Officer 11/2003 to Present
- United Airlines Pilot 1997 to 2019

Certifications:

CERTIFIED FINANCIAL PLANNER™ (CFP®), 2006

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 73,000 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 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 2000 hours per year); and

- Ethics - Agree to be bound by CFP Board's Standards of Professional Conduct a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education - Complete 30 hours of continuing education hours every 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.

Item 3 Disciplinary Information

Mr. Carroll does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Mr. Carroll does not have any other business activities.

Item 5 Additional Compensation

Mr. Carroll does not receive any additional compensation or economic benefit from a non-client for providing investment advisory services beyond what is received as a result of his employment with Avion Wealth. As part of his employment, Mr. Carroll does receive overrides for a percentage of client revenue for which he is the servicing advisor. In addition, he would receive override compensation for any clients he brings to the firm.

Item 6 Supervision

Mr. Carroll is Chief Executive Officer Officer of Avion Wealth; therefore Mr. Carroll's advisory activities are not supervised by any other individual.

AVION WEALTH

Elizabeth A. Brady, CFP®

2829 Technology Forest Blvd, Suite 300
The Woodlands, TX 77381
Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Elizabeth A. Brady that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Elizabeth Brady is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Elizabeth A. Brady is 6284248.

Item 2 Educational Background and Business Experience

Elizabeth A. Brady, CFP®

Year of Birth: 1990

Formal Education After High School:

- Texas A&M University, Bachelor of Arts, Economics, 2012

Business Background:

- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Partner, 04/2016 to Present
- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Wealth Manager, 10/2013 to Present
- Efficient Wealth Management, LLC, Relationship Manager, 06/2012 to 10/2013

License:

- Series 65 attained in 2013

Certifications:

CERTIFIED FINANCIAL PLANNER™ (CFP®), 2019

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 73,000 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 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 2000 hours per year); and

- Ethics - Agree to be bound by CFP Board's Standards of Professional Conduct a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education - Complete 30 hours of continuing education hours every 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.

Item 3 Disciplinary Information

Elizabeth A. Brady does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Elizabeth A. Brady does not have any other business activities.

Item 5 Additional Compensation

Elizabeth A. Brady does not receive any additional compensation or economic benefit from a non-client for providing investment advisory services beyond what is received as a result of her employment with Avion Wealth. As part of her employment, Ms. Brady does receive overrides for a percentage of client revenue for which she is the servicing advisor. In addition, she would receive override compensation for any clients she brings to the firm.

Item 6 Supervision

Elizabeth's advisory activities are supervised by Paul Carroll, Chief Executive Officer. Mr. Carroll can be reached at (281) 528-1200.

AVION WEALTH

Ashley Dominey Stewart, CFP®

2829 Technology Forest Blvd, Suite 300
The Woodlands, TX 77381
Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Ashley Dominey Stewart that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Ashley Stewart is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Ashley Stewart is 5538191.

Item 2 Educational Background and Business Experience

Ashley Dominey Stewart, CFP®

Year of Birth: 1986

Formal Education After High School:

- Texas Tech University, Masters of Science, Personal Financial Planning, 2009
- Texas Tech University, Bachelors of Science, Personal Financial Planning, 2008

Business Background:

- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Partner, 07/2018 to Present
- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Wealth Manager, 01/2014 to Present
- Avion Wealth LLC fka Efficient Wealth Management, LLC, Senior Relationship Manager, 10/2013 to 01/2014
- Houston Wealth Strategies, Associate Wealth Advisor, 08/2012-09/2013
- Saunders & Associates, LLC, Associate Planner, 04/2011 to 08/2012
- Edward Jones, Summer Intern National Headquarters, Summer 2008

Certifications:

CERTIFIED FINANCIAL PLANNER™ (CFP®), 2013

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 73,000 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, 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 *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every 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.

Item 3 Disciplinary Information

Ashley Dominey Stewart does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Ashley Dominey Stewart does not have any other business activities.

Item 5 Additional Compensation

Ashley Dominey Stewart does not receive any additional compensation or economic benefit from a non-client for providing investment advisory services beyond what is received as a result of her employment with Avion Wealth. As part of her employment, Ms. Stewart does receive overrides for a percentage of client revenue for which she is the servicing advisor. In addition, she would receive override compensation for any clients

she brings to the firm.

Item 6 Supervision

Ashley's advisory activities are supervised by Paul Carroll, Chief Executive Officer. Mr. Carroll can be reached at (281) 528-1200.

AVION WEALTH

Sarah E. McIvor, CFP®

2829 Technology Forest Blvd, Suite 300
The Woodlands, TX 77381
Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Sarah E. McIvor that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Sarah E. McIvor is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Sarah E. McIvor is 6438824.

Item 2 Educational Background and Business Experience

Sarah E. McIvor, CFP®

Year of Birth: 1989

Formal Education After High School:

- Texas A&M University, CFP® Certification, 2018
- Texas A&M University, Bachelor of Business Administration, Management, 2011

Business Background:

- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Partner, 10/2020 to Present
- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Wealth Manager, 04/2018 to Present
- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Associate Wealth Manager, 04/2016 to 08/2018
- Avion Wealth, LLC fka Efficient Wealth Management, LLC, Relationship Manager, 04/2014 to 04/2016
- BBVA Compass, Asst. Branch Manager, 07/2012 to 04/2014
- College Station ISD, Substitute Teacher, 01/2012 to 06/2012

License:

- Series 65 attained in 2014

Certifications:

CERTIFIED FINANCIAL PLANNER™ (CFP®), 2018

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 73,000 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, 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 *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every 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.

Item 3 Disciplinary Information

Sarah E. McIvor does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Sarah E. McIvor does not have any other business activities.

Item 5 Additional Compensation

Sarah E. McIvor does not receive any additional compensation or economic benefit from

a non-client for providing investment advisory services beyond what is received as a result of her employment with Avion Wealth. As part of her employment, Ms. McIvor does receive overrrides for a percentage of client revenue for which she is the servicing advisor. In addition, she would receive override compensation for any clients she brings to the firm.

Item 6 Supervision

Sarah's advisory activities are supervised by Paul Carroll, Chief Executive Officer. Mr. Carroll can be reached at (281) 528-1200.

AVION WEALTH

Megan Beaufays, CFP®

2829 Technology Forest Blvd, Suite 300

The Woodlands, TX 77381

Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B

BROCHURE SUPPLEMENT

This brochure supplement provides information about Megan Beaufays that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Megan Beaufays is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Megan Beaufays is 6082233.

Item 2 Educational Background and Business Experience

Megan Beaufays, CFP®

Year of Birth: 1987

Formal Education After High School:

- Bowling Green State University, Ohio, Bachelor of Arts in Communication, 2009

Business Background:

- Avion Wealth, LLC, Wealth Manager, 11/2023 to Present
- Avion Wealth, LLC, Relationship Manager, 08/2020 to 11/2023
- LPL Financial, Registered Representative, 01/2019 to 04/2020
- PNC Bank, Mortgage Loan Officer, 06/2017 to 01/2019
- PNC Investments, Licensed PCG Relationship Manager, 06/2015 to 06/2017
- JP Morgan Securities fka Chase Investment Services, Licensed Banker, 06/2012 to 06/2015
- JP Morgan Chase Bank, Personal Banker, 06/2011 to 06/2015

License:

- Series 65 attained in 2021

Certifications:

CERTIFIED FINANCIAL PLANNER™ (CFP®), 2023

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 73,000 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, 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 *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every 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.

Item 3 Disciplinary Information

Megan Beaufays does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Megan Beaufays does not have any other business activities.

Item 5 Additional Compensation

Megan Beaufays does not receive any additional compensation or economic benefit from a non-client for providing investment advisory services beyond what is received as a result of her employment with Avion Wealth. As part of her employment, Ms. Beaufays does receive overrides for a percentage of client revenue for which she is the servicing

advisor. In addition, she would receive override compensation for any clients she brings to the firm.

Item 6 Supervision

Megan's advisory activities are supervised by Paul Carroll, Chief Executive Officer. Mr. Carroll can be reached at (281) 528-1200.

AVION WEALTH

Christopher J. McBee, CFP®

2829 Technology Forest Blvd, Suite 300
The Woodlands, TX 77381
Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Christopher McBee that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher McBee is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Christopher McBee is 5651350.

Item 2 Educational Background and Business Experience

Christopher McBee

Year of Birth: 1987

Formal Education After High School:

- Texas A&M University, Bachelor of Business Administration in Finance, 2009

Business Background:

- Avion Wealth, LLC, Relationship Manager, 02/2023 to Present
- Foreside Fund Services, LLC, Registered Representative, 08/2019 to 01/2023
- Yorktown Management & Research Co., Regional Sales Associate, 07/2019 to 01/2023
- Invesco Advisers, Inc., Internal Sales Consultant, 08/2014 to 06/2019
- IMG Financial Group, Financial Advisor, 03/2009 to 08/2014
- Minnesota Life Insurance Co., Agent, 03/2009 to 08/2014
- Securian Financial Services Inc., Registered Representative, 03/2009 to 08/2014

License:

- Series 7 and Series 66 attained in 2009
- SIE – Securities Industry Essentials Examiniation attained in 2018

Certifications:

CERTIFIED FINANCIAL PLANNER™ (CFP®), 2024

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 73,000 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, 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 *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every 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.

Item 3 Disciplinary Information

Christopher McBee does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Christopher McBee does not have any other business activities.

Item 5 Additional Compensation

Christopher McBee does not receive any additional compensation or economic benefit

from a non-client for providing investment advisory services beyond what is received as a result of his employment with Avion Wealth. As part of his employment, Mr. McBee does receive overrides for a percentage of client revenue for which he is the servicing advisor. In addition, he would receive override compensation for any clients he brings to the firm.

Item 6 Supervision

Chris's advisory activities are supervised by Paul Carroll, Chief Executive Officer. Mr. Carroll can be reached at (281) 528-1200.

AVION WEALTH

Ashley Owens

2829 Technology Forest Blvd, Suite 300
The Woodlands, TX 77381
Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Ashley Owens that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Ashley Owens is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Ashley Owens is 7726721.

Item 2 Educational Background and Business Experience

Ashley Owens

Year of Birth: 1996

Formal Education After High School:

- Arizona State University, Bachelor of Science in Economics, 2021
- College for Financial Planning – 2026 - present

Business Background:

- Avion Wealth, LLC, Relationship Manager, 09/2025 to Present
- Providen Wealth Advisors, LLC, Paraplanner, 01/2025 to 09/2025
- Osaic Wealth, Inc., Registered Assistant, 07/2024 to 12/2024
- Schroeder Wealth Advisors, Financial Data Analyst, 04/2023 to 12/2024

License:

- Series 66 - Passed 2024
- Series 7 – Passed 2024
- Life & Health Insurance – Passed 2025

Item 3 Disciplinary Information

Ashley Owens does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Ashley Owens does not have any other business activities.

Item 5 Additional Compensation

Ashley Owens does not receive any additional compensation or economic benefit from a non-client for providing investment advisory services beyond what is received as a result of her employment with Avion Wealth. As part of her employment, Ms. Owens does receive overrides for a percentage of client revenue for which she is the servicing advisor. In addition, she would receive override compensation for any clients she brings to the firm.

Item 6 Supervision

Ashley's advisory activities are supervised by Paul Carroll, Chief Executive Officer. Mr. Carroll can be reached at (281) 528-1200.

AVION WEALTH

Alexander Amundson, CFP®

2829 Technology Forest Blvd, Suite 300
The Woodlands, TX 77381
Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Ryan Hague that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Alex Amundson is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Alex Amundson is 6327059.

Item 2 Educational Background and Business Experience

Alex Amundson

Year of Birth: 1989

Formal Education After High School:

- California State University Fresno, Bachelor of Business Administration, 2015
- Clovis Community College, Associates in Business, 2013

Business Background:

- Avion Wealth, LLC, Associate Wealth Manager, 04/2026 to Present
- Ameriprise Financial Services, LLC, Registered Representative, 11/2024 to 04/2026
- LPL Financial LLC, Registered Representative, 05/2022 to 11/2024
- Royal Alliance, Administrative Assistant, 02/2022 to 04/2022
- Stratgic Wealth Advisors Group, Investment Adviser Representative, 02/2020 to 02/2022
- LPL Financial LLC, Registered Representative, 04/2019 to 02/2022

Certifications:

CERTIFIED FINANCIAL PLANNER™ (CFP®), 2024

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 73,000 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, 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 *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours every 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.

Item 3 Disciplinary Information

Alex Amunson does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Alex Amunson does not have any other business activities.

Item 5 Additional Compensation

Alex Amunson does not receive any additional compensation or economic benefit from a non-client for providing investment advisory services beyond what is received as a result of his employment with Avion Wealth. As part of his employment, Mr. Amundson does receive overrides for a percentage of client revenue for which he is the servicing advisor. In addition, he would receive override compensation for any clients he brings to the firm.

Item 6 Supervision

Alex's advisory activities are supervised by Paul Carroll, Chief Executive Officer. Mr. Carroll can be reached at (281) 528-1200.

AVION WEALTH

Abigail Demirovic

2829 Technology Forest Blvd, Suite 300
The Woodlands, TX 77381
Tel.: (281) 528-1200

August 2026

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Abigail Demirovic that supplements the Avion Wealth's brochure. You should have received a copy of that brochure. Please contact Paul Carroll at (281) 528-1200 if you did not receive Avion Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Abigail Demirovic is available on the SEC's website at **www.adviserinfo.sec.gov.** The searchable CRD number for Ashley Owens is 7798773.

Item 2 Educational Background and Business Experience

Abigail Demirovic

Year of Birth: 1996

Formal Education After High School:

- Texas A&M, 2015-2017, no degree obtained

Business Background:

- Avion Wealth, LLC, Associate Relationship Manager, 08/2020 to Present
- BBVA, Sales & Service Advisor, 10/2019 to 08/2020
- Masaage Envy, General Manager, 05/2017 to 09/2019

License:

- Series 65 - Passed 2026

Item 3 Disciplinary Information

Abigail Demirovic does not have any reportable legal or disciplinary information.

Item 4 Other Business Activities

Abigail Demirovic does not have any other business activities.

Item 5 Additional Compensation

Abigail Demirovic does not receive any additional compensation or economic benefit from a non-client for providing investment advisory services beyond what is received as a result of her employment with Avion Wealth. As part of her employment, Ms. Demirovic does receive overrides for a percentage of client revenue for which she is the servicing advisor. In addition, she would receive override compensation for any clients she brings to the firm.

Item 6 Supervision

Abigail's advisory activities are supervised by Paul Carroll, Chief Executive Officer. Mr. Carroll can be reached at (281) 528-1200.

CODE OF ETHICS

Avion Wealth

Preamble

Our clients' interests always come first. Our experience shows that if we serve our clients well, our own success will follow. Our assets are our people, capital and reputation. If any of these is ever diminished, the last is the most difficult to restore.

Introduction

This is the Code of Ethics (the "Code") of Avion Wealth (the "Company"). The Company's Policies on Insider Trading and Personal Securities Transactions are included in the Code.

General Principles

The Company is a fiduciary for its investment advisory clients. Because of this fiduciary relationship, it is generally improper for the Company or its Associated Persons to: use for their own benefit (or the benefit of anyone other than the client), to the detriment of the client, information about the Company's trading or recommendations for client accounts; or take advantage of investment opportunities that would otherwise be available for the Company's clients.

Also, as a matter of business policy, the Company wants to avoid even the appearance that the Company, its Associated Persons, or others receive any improper benefit from information about client trading or accounts or from our relationships with our clients or with the brokerage community.

The Company expects all Associated Persons to comply with the spirit of the Code, as well as the specific rules contained in the Code.

The Company treats violations of this Code (including violations of the spirit of the Code) very seriously. Violation of either the letter or the spirit of this Code, may result in the Company taking disciplinary measures, including, without limitation, imposing penalties or fines, reduction of compensation, demotion, requiring unwinding of the trade, requiring disgorgement of trading gains, suspending or terminating of employment, or any combination of the foregoing.

Improper trading activity can constitute a violation of this Code. Nevertheless, the Code can be violated by failing to file required reports, or by making inaccurate or misleading reports or statements concerning trading activity or securities accounts. Individual conduct can violate this Code even if no clients are harmed by such conduct.

This is an abbreviated version of the Avion Wealth Code of Ethics. The full version is available upon request. Please contact us at:

Avion Wealth
2829 Technology Forest Blvd Suite 300
The Woodlands, TX 77381
Phone: 281 528-1200
Fax: 888 868-1168
Email: **Paul@AvionWealth.com**

AVION WEALTH

Customer Information Privacy Principles

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to insure that our customers are confident that we will manage their financial affairs expertly and confidentially.

At Avion Wealth, our customers have access to a broad range of products and services. To deliver these products and services as effectively and conveniently as possible, it is essential that we use technology to manage and maintain certain customer information.

We want to assure all of our customers that whenever information is used, it is done with discretion. The safeguarding of customer information is an issue we take seriously at Avion Wealth. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Principles. It is these Privacy Principles that guide us in serving the privacy needs of our customers.

1. **Recognition of a Customer's Expectation of Privacy**: At Avion Wealth, we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality service, we recognize that one of our most important assets is our customers' trust. Thus, the safekeeping of customer information is a priority for Avion Wealth.

2. **Use, Collection, and Retention of Customer Information**: Avion Wealth limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality service, and offer products, services, and other opportunities that may be of interest to our customers. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, date of birth, employment status, annual income and net worth.

3. **Maintenance of Accurate Information**: Avion Wealth recognizes that it must maintain accurate customer records. Therefore, Avion Wealth has established procedures to maintain the accuracy of customer information and to keep such information current and complete. These procedures include responding to requests to correct inaccurate information in a timely manner.

4. **Limiting Employee Access to Information:** At Avion Wealth, employee access to personally identifiable customer information is limited to those with a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all Avion Wealth employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.

5. **Protection of Information via Established Security Procedures:** Avion Wealth recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against the unauthorized access to customer information. Therefore, Avion Wealth has established appropriate security standards and procedures to guard against any unauthorized access to customer information.

6. **Restrictions on the Disclosure of Customer Information:** Avion Wealth does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties. In the course of servicing a client's account, Avion Wealth may share some information with its service providers, such as transfer agents, custodians, broker/dealers, accountants and lawyers; in the normal course of our business (for example, with consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

   It is Avion Wealth's policy never to sell information about current or former customers or their accounts to anyone. It is also Avion Wealth's policy not to share information unless required to process a transaction, at the request of a customer, or as required by law.

7. **Maintaining Customer Privacy in Business Relationships with Third Parties:** If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

8. **Disclosure of Privacy Principles to Customers:** Avion Wealth recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should call Paul J. Carroll at 281-528-1200 or e-mail him at **paul@avionwealth.com**.

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time

without prior notice. These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.

Paul J. Carroll, Principal

Avion Wealth

AVION WEALTH

BUSINESS CONTINUITY PLAN SUMMARY STATEMENT

Avion Wealth has developed and implemented a Business Continuity Plan ("BCP") that includes redundant data centers and alternate facilities to protect its business processes and technology environment in the event of a significant business disruption. Avion Wealth's policy is to respond to a significant business disruption (SBD) in an effort to safeguard employees' lives and firm property, make a financial and operational assessment, quickly recover and resume operations, protect the firm's books and records, and allow our customers to transact business.

The plan addresses business disruptions that may be caused by a local incident or by a regional or market related disaster that applies to many companies. The Plan covers our critical business processes and related employees essential for Avion Wealth to continue to conduct business for an interim or temporary period during a business interruption. Every important aspect of Avion Wealth's securities business, including data back-up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business is addressed in this plan.

Avion Wealth's goal is to recover its Critical Business Processes with minimal interruption, depending on the nature of the disruption. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business relatively quickly. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and presume to recover and resume business within a short period of time. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

If after a significant business disruption you cannot contact us as you usually do at (281) 528-1200, or you may go to our website for contact instructions: **www.AvionWealth.com**.

If you cannot access us through either of those means, you can directly contact the custodian of your account:

Charles Schwab & Co., Inc.	800-435-4000	**www.schwab.com**

Fidelity Institutional Wealth Services 800-343-3548 **www.fidelity.com**

They can provide instructions on how they may provide prompt access to your funds and securities including accepting buy and sell orders and issuing checks and wires from your account. If your account is held at a mutual fund or insurance company, you should contact the company directly for access to your securities.

Please be advised that our business continuity plan is subject to change and modification. Our firm will update this plan whenever we have a material change to our operations, structure, business, or location or to our custodians. In addition, our firm will review our plan annually to modify it for any changes. If the plan is modified, we will promptly post the revised summary on our Website. If you have questions about our business continuity planning or would like a written copy of the summary of our BCP, you can contact us at:

Avion Wealth

2829 Technology Forest Blvd Suite 300

The Woodlands, TX 77381

Email: **Paul@AvionWealth.com**